

6th November 2012

Programme Officer: Nicola Gandy
Bridgend LDP Examination
Laurel Room
The Innovation Centre
Bridgend Science Park
BRIDGEND
CF31 3NA

Dear Mrs Gandy

Representor No. - 850.B2

Session 1 Strategy, Matters and Issues, Chapter 2 & 3-The Plan Strategy/Producing High Quality Sustainable Places

Para 2.12

Qn2w. Is it the environmental constraints that the Council considers make the settlement (Coity) unsuitable for inclusion in the SRGA rather than a risk of undermining the regeneration strategy, as the Council suggested in its response?

There are no substantive environmental constraints that would preclude the inclusion of Coity within the SRGA.

It is our contention that the overall Regeneration Led Spatial Strategy which promotes Bridgend as the key principle settlement (PLA1) for growth and development appears sound. The definition of the Bridgend settlement area is however unduly restrictive and the adjoining settlement of Coity and others which form a natural adjunct to

Bridgend should be included within the key principal settlement as a focus for residential and other regeneration led development.

The inclusion of Coity within the SRGA can readily fit within the strategy without harming environmental interests or policy objectives.

Bridgend is seen as a sustainable location in which to focus development and in particular there is reference at paragraph 2.3.17 that *'Outside the town centre the Strategy acknowledges the extent of existing commitments and significant opportunities that exist on greenfield, large-scale brownfield and underutilised sites within the wider urban area of Bridgend'*

The Croesty Farm site (850.B2) lies on the edge of the Bridgend SRGA (Strategic Policy SP1) and in land use terms is enclosed to the north and the south by the Parc Derwen (PLA3(1) and Brackla Industrial Estate (PLA3(2) Regeneration and Mixed Use Development Areas. Development at Croesty Farm would equally contribute to, and benefit from, the strategic objectives of both of these regeneration areas.

The site did not benefit from the more rigorous assessment of the LDP Stage 2 Appraisal having failed the Stage 1 Assessment because the LDP Strategy did not identify Coity as a location for strategic growth.

The site Sustainability Appraisal (Soltys Brewster Consulting) undertaken to support our alternative site submission, demonstrates that there are no substantive environmental constraints to the development of this land. The inclusion of this site within the settlement boundary of Coity can meet the sustainability objectives of the plan without harm to interests of acknowledged importance including environmental issues.

Green Wedge

The site forms part of the proposed Green Wedge (**policy ENV2 (1)**). Croesty Farm is strongly influenced by existing development on the southern edge of the village and by the Coity bypass which lies within 150metres of the settlement boundary. This very narrow tract of land, in practice comprising an enclosed single narrow field width, means that the site fails to function as an 'open area of countryside' and consequently does not justify designation as functional Green Wedge that would prevent the coalescence of settlements.

The open countryside character of the landscape to the south of the village has already been severely compromised by the construction of the Coity bypass, severing the Croesty Farm site from areas of adjoining land that, together with the site, could feasibly have been eligible to function as Green Wedge land, had the bypass not been constructed. The validity of the designated Green Wedge land to the south of Coity is questionable.

In conclusion therefore, the site's development would be compatible with the Strategic Policy SP4 (Conservation and Enhancement of the Natural Environment) when the validity of the Green Wedge (ENV2 (1)) is reconsidered.

Ecology

The site is not known to have any special ecological value in terms of habitats or species, (although this would be confirmed through site survey). There are no European or UK designated sites (SAC, SSSI) within or alongside the site and no known proposed Sites of Importance for Nature Conservation (SINC) within or adjoining the site. The greatest potential for ecological interest is likely to be along the wooded hedge boundaries to the south, west and east. There are no plans to remove or change the management regime for any of these hedge boundaries. A linear tract of land to the south of the site (lying between the site boundary and the bypass fence) could however offer potential for habitat creation/enhancement through planting or proactive grassland management.

Landscape and Visual Aspects

A preliminary appraisal of the landscape and visual context of the site was undertaken in September 2011 as part of our alternative site submission. The appraisal concluded that the site would be suitable for housing development in landscape terms, and demonstrated that, other than the Green Wedge designation, there is no documented evidence to suggest that the landscape of the Croesty Farm site is worthy of special protection.

Significance in terms of Habitat Regulations

Assessment methodology requires the identification of European sites of nature conservation importance, such as Special Area of Conservation (SAC), that lie within 2km of a proposed site. In this instance, there are no SACs that lie within 2km of the Croesty Farm site and therefore it can be concluded that development on the site would have no impact on a European site of nature conservation importance.

Strategic Policy SP5 Conservation of the Built and Historic Environment

The Soltys Brewster Appraisal concludes that the development of the site would have no effect on the setting of Coity Castle (Scheduled Ancient Monument), or the setting of the historic features of the Coity Conservation Area. The eastern quarter of the site lies within the designated Conservation Area (**Policy SP5 (2) Conservation Areas**), as do the modern houses overlooking the site in Castle Meadows. Development of the site would potentially present a more sympathetic appearance to the edge of the historic village than currently offered by the existing houses and would represent an enhancement of the built and historic environment of Coity village.

The site lies within a much larger **Area of Archeological Significance (SP5 (4))**. It is acknowledged that prior to any future development proposals being approved, archaeological evaluation of the site will be required to establish whether any significant archaeological features are present, and if so, how these would be safeguarded. Appropriate mitigation would ensure that the development is compatible with the strategic policy.

Conclusions

In summary therefore, it is our contention that the Deposit Plan underestimates the housing requirement of Bridgend County Borough and we raise objections elsewhere to the overall unit numbers (9,000) prescribed in the plan. There will be a need to find additional sites for residential development within the limits of the Strategy and we put forward this alternative site (Candidate Site Ref. 850.B2) which as we have outlined above, can fit within the strategy without harming environmental interests or policy objectives.

Yours sincerely

Christine Sullivan

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