

# Bridgend Local Development Plan

## Examination

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**Tuesday 20 November 2012 10:00am**

### **Session 1 – Strategy**

#### **Inspector’s Agenda with Matters and Issues**

#### **1. CHAPTER 1 - INTRODUCTION AND BACKGROUND**

- 1.1 Several Representors raise issues concerning Chapter 1 or more general matters that relate to the Plan as a whole. *[The figures in brackets identify a related representor and representation number].*

**Qn1a. Is it implicit that the Plan is to be read as a whole or should there be either a statement to that effect or further cross-referencing in the interests of coherence?** (54.1; 54.17; 54.40; 54.85)

**Qn1b. Should the Plan be seeking at 1.1.2 to ‘build upon and add value’ to the national Wales Spatial Plan?** (54.2)

**Qn1c. Having regard to coherence, is it appropriate in LS1 to describe recognised international, national and regional environmental features as key local needs and issues?** (54.3)

- 1.2 The Welsh Government considers that the Welsh Language should form part of the overall assessment when preparing the plan, ensuring that the principle of development is not decanted to the planning application stage. They seek clarification that in this instance the matter has not been overlooked (64.18). National policy on this matter is set out in Technical Advice Note TAN20.
- 1.3 The Council concluded, based on in Background Paper 1 (SD35), that the plan’s major development proposals will not affect linguistic balance and any language issues can be appropriately addressed at the development management stage.

**Qn1d. Should the Welsh Language be addressed directly in the Plan?**

#### **2. CHAPTERS 2 & 3 - THE PLAN STRATEGY/PRODUCING HIGH QUALITY SUSTAINABLE PLACES**

##### Objectives

- 2.1 The Countryside Council for Wales (CCW) seeks a number of modifications to the objectives.

**Qn2a. As Objective 1 generally seeks to produce ‘high quality sustainable places’ is it necessary to also modify Objective 1c to repeat the word ‘sustainable’ specifically in relation to the regeneration of the**

**Porthcawl Waterfront and having regard to its proximity to sites of conservation importance? (54.6)**

**Qn2b. Should paragraph 2.3.31 further define the status of protected sites near Porthcawl and their legal status or is that suitably addressed elsewhere in the Plan? (54.14)**

**Qn2c. Does Objective 2e also need to repeat national policy in Planning Policy Wales aimed at reducing energy demand and improving energy efficiency? (54.9)**

**Qn2d. In Objective 3f, what does 'realistic' mean when describing town and district centres and is use of the term coherent? (54.11)**

**Qn2e. Does the Sustainability Appraisal and other supporting information demonstrate that environmental considerations have suitably informed the regeneration strategy notwithstanding the omission of such a reference from the listed considerations at paragraph 2.3.11? (54.13)**

### Employment and the Economy

2.2 The Employment Land Review 2010 concluded that the most prudent method of calculating need was on past completion rates of employment development which average only 6.33ha per annum. On that basis the Welsh Government estimates that the requirement during the plan period would be for only 94.95ha (or 76ha after allowing for completions between 2006 and 2009) (64.7). This may suggest a potential oversupply of employment land. The Council's response relies on Background Paper 9 Employment Land Supply (SD43).

**Qn2f. In that context:**

- (i) Why do Policies REG1 and SP9 provide for as much as 153ha of employment land?**
- (ii) How much of that supply represents new allocations that are not already the subject of extant planning permissions?**
- (iii) Does that high level of employment provision have implications for the amount of housing provision given that the Cambridge Econometrics Report concluded that economic growth would be reduced and that fewer households would be created as a result?**
- (iv) If employment land provision substantially exceeds likely demand, would that risk substantial non-delivery and uncertainty in relation to the allocated sites including delivery of the mixed use sites and the regeneration-led spatial strategy? (54.69; 54.74)**
- (v) Is the extent of provision 'realistic about resource availability' including for infrastructure and site restoration?**

- (vi) **Would the extent of supply discourage speculative development for employment purposes?**
- (vii) **Does providing land to meet 'as yet unidentified needs' justify the extent of proposed provision?**
- (viii) **Has any consideration been given to the cumulative employment land supply including adjoining authorities?**
- (ix) **Is it necessary to protect all the allocated sites from other forms of development**
- (x) **Some REG1 sites are proposed for B1 and B8 development. Why does REG2 protect 'industrial land and buildings' and not other forms of employment land?**

### Regeneration-led Development

- 2.3 Policy SP1 provides that development will be focused in the four Strategic Regeneration Growth Areas (SRGA). The policy and the accompanying text at paragraph 3.1.13 do not define what proportion of development may occur outside these areas. However Table 3.1 shows that 84% of housing allocations would be within the SRGA and therefore 16% would be elsewhere and the detailed locations are set out in Policies COM1 and COM2.
- 2.4 The allowance for windfall housing development is not divided between the SRGAs and other areas. However Policy COM3 limits such development to locations within defined settlement boundaries. There is no allowance for development outside development boundaries. Policy ENV1 does not allow for housing development in the countryside except for replacement dwellings.
- 2.5 Table 3.1 shows that most vacant employment land is in the SRGA areas. However the Table excludes the allocated Strategic Employment Sites from this analysis on the basis that they are expected to attract workers from a wider area within and beyond the authority's boundaries.

**Qn2g. Housing need and supply will be considered at tomorrow's session. However if some Representatives are correct in saying that additional housing allocations should be made to bring the housing supply figure closer to the 11,000 figure in the Welsh Government Household Projections plus a margin for non-delivery, is there scope to maintain a similar proportion of housing supply within the SRGAs such that the spatial strategy would be maintained?**

**Qn2h. In the LDP, what is the proportion of allocated housing land on greenfield sites as opposed to brownfield (previously developed) land?**

**Qn2i. To increase the housing supply would it be preferable to:**

- **use previously-developed employment land;**
- **use greenfield land that has already been allocated for new employment on mixed use or standalone sites; or**

- **release additional greenfield sites on the edge of urban areas?**

**Qn2j. Will the Council's intended preparation of an online LDP site database as part of the Annual Monitoring Report suitably address the Welsh Government concerns about the lack of clarity of delivery of the Strategy and especially the linkages between Table 3.1, Policies COM1 and COM2, paragraph 6.1.5 and the PLA1 settlement hierarchy? (64.15)**

2.6 Several representors who are promoting alternative sites suggest that more greenfield land should be released for housing to provide 'flexibility' (753.1; 784.3; 787.4; 788.1; 788.10; 792.1; 1063.1; 1239.1; 1245.1; 1255.1; 1255.8; 1255.14; 1255.19). The Council considers this to be unnecessary and that it would undermine the Plan's strategy.

**Qn2k. Why is more flexibility needed?**

**Qn2l. Would greenfield sites be likely to be developed first because of their lower development costs and lower alternative use values?**

**Qn2m. Would such development support the regeneration-led strategy or undermine it?**

2.7 The Countryside Council for Wales seeks the amendment of Policy SP1 to provide that the scale of development should reflect the environmental capacity of an area to accommodate growth. (54.16)

**Qn2m. Is that necessary or is it suitably addressed by reading the LDP as a whole to include policies SP2, PLA4, and ENV4-6?**

#### SRGA Boundaries and Settlement Hierarchy

2.8 Policy PLA1 sets out a settlement hierarchy and provides that development within these settlement boundaries will be 'at a scale commensurate' with their role and function. Whilst the background papers help to demonstrate how the settlements have been assessed and classified, the Welsh Government comments that it is not clear how this links to the strategy for their development and especially how levels of housing growth at the smaller settlements are to be controlled (64.14).

2.9 In response the Council refers to Background Paper 12: Housing Distribution (SD46) which explains the distribution of housing allocations according to both size of settlement and the SRGAs and which also highlights the distribution of extant permissions on small sites. That paper affirms that the allocations made accord with the Regeneration Led Strategy and indicates that '15% of the total housing supply is expected to be from Windfall and Small Sites however this will be managed by Strategic Policy SP1 and the settlement boundaries associated with the settlements defined in Policy PLA1.'

**Qn2o. Is PLA1 directed at all forms of development or only at housing? If the latter, should that be made explicit in the interests of coherence?**

**Qn2p. SP1 says that: 'In particular, development will be focused in the [SRGAs].'** Paragraph 3.1.15 in support of PLA1 says that 'The identified settlements will continue to be the main focus of future planned development.' How are these statements to be reconciled when Pencoed and Pyle/Kenfig Hill/North Cornelly are listed as main settlements and have strategic employment allocations but are not included in the SRGAs?

**Qn2q. As long as a proposed windfall development lies within a defined settlement boundary how will it be assessed whether its scale is 'commensurate with the role and function of the settlement'?**

2.10 Some Representors seek the redesignation of Pencoed as a strategic location for both employment and residential development (851.5 & 851.15-19).

**Qn2r. Would that be a fifth SRGA?**

**Qn2s. What effect would that have on the regeneration-led strategy?**

**Qn2t. Would there be a conflict with the Wales Spatial Plan which does not recognise Pencoed as a key settlement?**

**Qn2u. Does the strategic development permitted and planned nearby at Llanharan in Rhondda Cynon Taff have any bearing on this?**

2.11 Notwithstanding their physical separation and the intervening M4 motorway, South Cornelly was included with North Cornelly as one settlement in the Settlement Role and Function Study (SD49) from which the Council says the settlement classification was derived. However in PLA1 North Cornelly is now defined with Pyle and Kenfig Hill as a 'main settlement' and South Cornelly is defined as a separate 'small settlement'.

**Qn2v. What is the reason for now excluding South Cornelly from being part of that main settlement and why was it previously included? (851.2)**

2.12 Coity is defined by PLA1 as a small settlement and there are no housing allocations. However it is close to other major development allocations to the north west and south west. The Proposals Map shows that the settlement closely adjoins the Bridgend SRGA but that the village is subject to a number of environmental designations including two Green Wedges, a conservation area and an area of archaeological significance.

**Qn2w. Is it these environmental constraints that the Council considers make the settlement unsuitable for inclusion in the SRGA rather than a risk of undermining the regeneration strategy, as the Council suggested in its response to Representation 850.5?**

**Qn2x. Could all development in the Plan be accommodated at Bridgend as one Representor suggests and, if so, would that accord with national policy, and what would be the implications for the rest of the authority's area? (1212.5)**

## Implementation of Regeneration Strategies

- 2.13 Policy PLA2 states that 'Development likely to have an unacceptable or detrimental impact on the implementation of a regeneration strategy/programme will not be permitted'. Several Representors object to this on the basis that they consider that it would prevent greenfield development and development which has other (different) benefits (1239.4; 1245.3; 1255.10; 1255.21).

**Qn2z. As written the Policy would preclude not only unacceptable impacts but also any acceptable detrimental impact as well. Should it read 'Development likely to have an unacceptably detrimental impact etc.'?**

**Qn2aa. As greenfield development of unallocated land outside settlements would contravene Policy ENV1, is Policy PLA2 necessary?**

**Qn2bb. What examples of other forms of development might be controlled by the policy?**

## Design

- 2.14 Design Policy SP2(4)(ii) seeks to use land efficiently by preferring the development of previously developed land to greenfield development and is the subject of a representation of objection (1212.5).

**Qn2cc. As it reflects national policy at Section 4.8 of Planning Policy Wales, would a different approach risk making the plan unsound?**

1 October 2012