



Bridgend Local Development Plan 2006 – 2021

Consultation Report

PURSUANT TO REGULATION 17 (c)(iii) OF THE TOWN AND COUNTRY
PLANNING (LOCAL DEVELOPMENT PLAN) (WALES) REGULATIONS 2005

March 2011

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1. Introduction

- 1.1 Section 22 (2)(c) of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 requires that, when a Local Planning Authority submits its Local Development Plan (LDP) to the National Assembly for Wales for examination, it is accompanied by a Consultation Report.
- 1.2 This report should outline details of how Bridgend County Borough Council has conducted consultation at various stages of LDP preparation; who specifically was consulted, the nature of any responses received and how any issues raised were fed into the deposit LDP.
- 1.3 **The consultation report has initially been prepared following public consultation on the Bridgend Local Development Pre Deposit Proposals in February / March 2009. It is envisaged, however, that the whole of this document will be updated prior to the submission of the LDP to the National Assembly for Wales, to take into account the public consultation which will be held on the deposit LDP in 2010 and any site allocation representations.**
- 1.4 This document flows in a chronological order outlining consultation activities in the Delivery Agreement (regulation 9), Pre-Deposit participation (regulation 14), Pre-Deposit public consultation (regulation 15), the deposit of Proposals (regulation 17) and the site allocations representation (regulation 20) stages of plan preparation. Whilst detailing consultation on the Delivery Agreement is not a statutory requirement, it is included in this report for completeness.
- 1.5 The Bridgend LDP has been prepared in accordance with the provisions of the Bridgend LDP Delivery Agreement (revised November 2010). The timetable which was followed is set out in Table 1 below:

Stage	Date
Review and Develop Evidence Base for LDP	April 2006 – October 2010
Delivery Agreement <i>Consultation Period</i>	April 2006 – January 2007 <i>August 2006 – September 2006</i>
Pre-Deposit LDP Participation & Consultation <i>Consultation Period</i>	October 2006 – October 2009 <i>January 2009 – March 2009</i>
Deposit LDP and Feedback <i>Consultation Period</i>	September 2009 – October 2011 <i>March 2011 – May 2011</i>
Advertisement of 'Alternative Sites' <i>Consultation Period</i>	September 2011 – November 2011 <i>September 2011 – November 2011</i>

Submission and Examination	December 2011 – June 2012
Inspectors Report	November 2012 – January 2013
Adoption	November 2012 – February 2013
Annual Monitoring Report and Review of LDP	February 2013 onwards

Table 1: LDP Timetable

Source: Bridgend LDP Delivery Agreement (Revised November 2010)

2. Delivery Agreement (Regulation 9)

- 2.1 The first two sections of this report outline the consultation activities which Bridgend County Borough Council undertook prior to the publication of the Pre-Deposit Proposals in February 2009, including consultation on a draft LDP Delivery Agreement.

Commencement of LDP Preparation

- 2.2 Bridgend LDP Preparation was formally commenced by Bridgend County Borough Council at its meeting of the 7th December 2005 (minute 433 refers). Prior to this, Bridgend County Borough Members had received a presentation from Officers on the Local Development Plan process at a meeting of the Planning and Development Committee on the 30 November 2005. The same presentation was given to the Town and Community Council Forum on the 31st January 2006 and an internal officers group on the 8th February 2006.

Local Development Plan:
tell us what you think!

When the council formally adopted its Unitary Development Plan (UDP) last year, it became one of only four local authorities in Wales to do so. But changes in Government legislation now mean that the UDP must be replaced with a Local Development Plan (LDP) within the next four years.

The LDP will set out what kinds of development can take place in the county borough and will feature the policies that will be used to determine planning applications up until the year 2011.

These policies will decide what areas of land can be used for housing, employment, roads, education and open space and will include the criteria used by the council to assess potential proposals.

The plan will have a direct effect not only on landowners, but on all residents of Bridgend County Borough. The council aims to officially adopt the LDP within four years as required by the Welsh Assembly Government.

The first stage of the process will see the authority preparing a timetable and a strategy for giving YOU the opportunity to have your say. Once these have been agreed, the council will be seeking your views on the development strategy before we set specific policies and start to allocate land.

Keep an eye on Bulletin for more news - you can also keep up to date with preparations for the LDP by calling 01454 643443 or by emailing development@bridgend.gov.uk

More information about the LDP together with an online version of the Unitary Development Plan and an interactive Proposals Map can be found on the Development Planning pages of www.bridgend.gov.uk

- 2.3 On the 15th December 2005, a letter was sent to all specific consultees informing them of the commencement of LDP work.
- 2.4 In April 2006, a short article featured in the *County Borough Bulletin*, the County Borough Council's periodical newsletter sent to every household in the County Borough, advising residents that LDP preparation had commenced. This article is reproduced at Box 1 above.

Delivery Agreement

- 2.5 The Bridgend LDP Delivery Agreement was prepared during the first half of 2006 and outlined how the Council will engage stakeholders (including the public) in preparing, reviewing and amending the LDP; the method by which the Council will deal with feedback from the consultation process; the resources the Council will commit to the Plan; and a timetable (reproduced above) for preparing and adopting the Plan.
- 2.6 This document was consulted on between the 3rd August 2006 and the 8th September 2006.
- 2.7 The consultation methods (as evidenced in Appendix A) used during this period were as follows:
- Notice of the consultation was advertised in the *Glamorgan Gazette* on Thursday 3rd August 2006.
 - A press release was issued and sent to local, regional and national media organisations; this resulted in articles appearing in the local press in the 2nd and 3rd weeks of August 2006. The release was also published on the Council's website.
 - An article appeared in the *County Borough Bulletin*, advising residents about the consultation, see Box 2 below.
 - The Delivery Agreement and appropriate representation forms were placed in every library throughout the County Borough for the consultation period for inspection. They were also viewable at the Council's Civic Offices in Angel Street, Bridgend. Posters were distributed to advertise the consultation at these locations.
 - The documents were also viewable on the Council's website, where there was an opportunity to submit representations electronically using an on-line form. Copies of the representation form were also available to download and print for mailing to the Council.
 - A meeting of the Bridgend Local Development Plan Key Stakeholder Forum was convened to discuss the Delivery Agreement on 15th August 2006. (See paragraph 2.13 below)
 - Copies of the consultation documentation were sent to all specific consultation bodies.
 - A letter was sent to all persons / organisations on the LDP consultation database informing them of the consultation and

how the documentation could be accessed. (See paragraph 2.9 below)



Local Development Plan update

The Sustainability Appraisal aims to make the plan as environmentally friendly as possible while the draft Scoping Report provides information on the county borough environment and what impact future LDP proposals may have.

You can view the consultation documents at www.bridgend.gov.uk, at local libraries and at the Civic Offices in Angel Street, Bridgend.

The next stage of preparation will seek your views on the council's overall development strategy before specific policies are formulated and land use is allocated.

Keep an eye on Bulletin for more news - you can also keep up to date with preparations for the LDP by calling (01656) 643165/3162, visiting the Development Planning pages of www.bridgend.gov.uk or by emailing developmentplanning@bridgend.gov.uk

Work is underway to establish the Local Development Plan (LDP) as a template that will determine what developments take place locally up until the year 2021.

Public consultation on the draft Delivery Agreement and Sustainability Appraisal Scoping Report is in its final stages. The Delivery Agreement sets out a Community Involvement Scheme and a timetable up to 2010, outlining how the public can become involved in the development of the plan.

Box 2 County Borough Bulletin, Autumn 2006

- 2.8 The results of the consultation and how the feedback was used to inform the contents of the final Delivery Agreement were reported to Bridgend County Borough Council at its meeting of the 5th October 2006. This report is reproduced at Appendix A and includes a matrix of responses to all the representations received.

3. Common / Ongoing Consultation Tools

LDP Consultation Database

- 3.1 Prior to the commencement of LDP preparation, an LDP consultation database was established by the Council in order to keep a record of all those persons / organisations (or 'representors') that wish to be informed about Plan preparation. The database also provides the facility for representations to successive consultations to be recorded electronically for easy retrieval and report creation.
- 3.2 Many contact details were carried over from previous Development Plan databases and updated as necessary. Any person / organisation wishing to be included on the database can contact the Development Planning section of the Council for their details to be included, altered or removed. The Council try to keep the database as up-to-date as possible; however, the onus is on the person / organisation to inform the Council as to any changes of details.
- 3.3 Following consultation on the draft Delivery Agreement, the Council needed to ensure that all organisations that wished to be included on the database had an opportunity to be informed about the process. It did this in several ways:
 - Several specific organisations were suggested from a number of different responders to the consultation, these were added to the database.
 - In order to properly identify those voluntary bodies operating in the County Borough whom wished to be involved in the LDP process, the Council enclosed a flyer with the Bridgend Association of Voluntary Organisations' newsletter of November 2006 which requested contact details of those organisations which wished to supply them.
 - The LDP Regulations require the Council to regard as specific consultees, those organisations that have been granted a license under section 6(1)(b) or (c) of the Electricity Act 1989 or section 7(2) of the Gas Act 1986 who are exercising functions in the County Borough. As it was not possible to determine which of the license holders were operating in the area, a letter was sent to every holder of such a license (from information obtained from the Office of Gas and Electricity Markets (OFGEM)) which totalled some 500 organisations, requesting they inform the Council if they were undertaking their duties in the County Borough.
- 3.4 **At the start of the Deposit Plan consultation period in Spring 2011 there were approximately 1,200 individuals or organisations listed on the LDP consultation database.**

Bridgend LDP Key Stakeholder Forum

- 3.5 The LDP Delivery Agreement established the LDP Key Stakeholders Forum, the composition of which is detailed in Appendix 3 of the Delivery Agreement. The Forum provides a consultative body which will inform the Council throughout plan preparation. Its composition reflects the need to establish a cross-section of views from different interest groups, statutory consultees, and other parties who will have a significant interest in the development process in the County Borough.
- 3.6 Membership of the Forum consists of partnership and representative organisations as well as certain Specific Consultation Bodies. This ensures that the Forum is of a manageable and effective size. It is envisaged that Forum members will disseminate LDP information to the persons / organisations they represent to facilitate extended consultation using existing structures.



Photographs 1 and 2: Bridgend LDP Key Stakeholder Forum Meetings

- 3.7 A meeting of the Stakeholder Forum is convened at every formal stage of LDP consultation, and is also used, as in the case of discussing strategic options, as a body by which informal opinions can be ascertained before more formal consultation takes place. Meetings are either convened as round-table workshop sessions where issues can be discussed and recorded, or as 'theatre-style' presentations where information can be relayed to stakeholders for them to disseminate throughout their own organisations.
- 3.8 Terms of Reference of the Stakeholder Forum have been agreed by the Council and are included at Appendix B.

LDP / Planning Awareness Raising

- 3.9 Where opportunities arise, the Council has tried to increase awareness of the Local Development Plan process across the County Borough. When consultation on the Delivery Agreement commenced, the Council widely distributed posters (see below) from the Welsh Assembly Government as well as its own highlighting the LDP process in general as well as the consultation in particular.

- 3.10 All LDP related material is deposited in every library of the County Borough as well as at the Council's Civic Offices to ensure that there is local access to hard copies of all LDP documentation.
- 3.11 Bridgend County Borough Council's website: www.bridgend.gov.uk/planning also contains all LDP Council reports, documents, consultations, evidence base material and contact information. This ensures that LDP information is accessible 24 hours a day and is particularly useful for those who work during the day and could therefore not access the documents through the libraries or at the Civic Offices.



Box 3 LDP Posters

- 3.12 In addition, several opportunities have arisen from the Caerau Housing Renewal Area project to display information regarding the Development Plan system in the County Borough. Events have been held on three separate occasions where the Local Planning Authority has exhibited information on the adopted Bridgend Unitary Development Plan and the emerging LDP. Officers were available to answer any queries that visitors may have had.



Box 3 Bridgend County Borough Council Website



Photograph 3: Caerau Housing Renewal Area Exhibition

- 3.13 In addition, Planning Officers have been proactive in advising the public on the preparation of the LDP, particularly when development queries are received and responded to.

Adjacent Local Authorities

- 3.14 The Local Planning Authority (LPA) has met with representatives from Neath Port Talbot County Borough Council, Rhondda Cynon Taf County Borough Council and the Vale of Glamorgan Council so that it can appraise them of the current status of the Bridgend LDP. There is also an opportunity to raise cross-border issues of concern as well as highlighting areas where there is an opportunity for collaborative working.
- 3.15 Similarly, the LPA is an active member of both the South East Wales Strategic Planning Group (SEWSPG) and the LDP Pathfinder Group which regularly meet to discuss both regional planning and Local Development Plan issues. These meetings are a useful source of information as best practice techniques are shared and potential obstacles (and their subsequent solutions) are discussed.

4. Pre Deposit Participation (Regulation 14)

- 4.1 Regulation 14 of the LDP Regulations state that, before complying with regulation 15 (relating to Pre-Deposit Proposals) a Local Planning Authority should engage specific and general consultation bodies for the purpose of generating alternative strategies and options.

Candidate Sites

- 4.2 Between November 2006 and January 2007, the Council invited the public, developers and landowners to nominate sites (or 'Candidate Sites') which they wished to be considered for inclusion as draft land use proposals in the future Deposit Plan.
- 4.3 Awareness of this invitation was conducted as follows (See Appendix C for evidence):
- In writing to over 650 persons and organisations on the LDP consultation database (including Elected Members)
 - In writing to all members of the LDP Key Stakeholder Forum
 - An advert placed in the Glamorgan Gazette on 9th November 2006
 - A press release issued on the 6th November 2006
 - Posters placed in all libraries, the Civic Offices reception area and the Planning Department reception area
 - All information placed on the Council's web site, including a link from the 'home page'
 - An article in the Winter 2006 edition of the County Borough Bulletin (see below)
- 4.4 Not only did this give developers an opportunity to submit sites in their ownership / control for consideration, it also gave the public and other interested organisations the chance to identify areas of land which they considered should be retained and / or protected from development in the LDP.
- 4.5 It was stressed, that at this stage of Plan preparation, there was no guarantee that any Candidate Site(s) would be taken forward as a proposal in the LDP. However, an awareness of such sites would enable the Council to assess site availability when formulating a future Vision and Strategic Options for the Plan.
- 4.6 A Candidate Site Register was compiled, containing 402 sites which were submitted by 202 proposers, and this was published in May 2007. All those who submitted Candidate Sites were included in the database of consultees on the Plan, and consequently they will be kept fully informed of progress on the Plan at each stage of its preparation.

Bridgend Local Development Plan

Bridgend County Borough Council is preparing a Local Development Plan (LDP) that will affect the way in which land in the county borough is used in future years.

The next stage in the LDP process involves taking developers, landowners and the community to discuss 'candidate sites' for potential allocation in the plan. The Council is for any land use including residential, employment, retail, public open space, leisure, development, sport, development, community or otherwise.

While there is no guarantee that sites suggested at this stage will be taken forward, their suggestion will enable the Council to progress the delivery of the plan, including a vision and strategy for future development across the county borough.

To consider a site for consideration, a plan of the site and an assessment questionnaire must first be submitted. The form asks general questions about the site to aid future assessment for LDP purposes. Copies of the form are available from the Planning Department - Case Officers, Angel Street, Bridgend, CF31 1RN during normal office hours at local libraries or from the planning pages of www.bridgend.gov.uk

The deadline for return of plans and forms is by 4.00pm on Wednesday 20 January 2007. Planning Officers are available to advise with completing forms.

The main administrative contact for Development Planning is on 01493 443071 / 443111 or email developmentplanning@bridgend.gov.uk




Box 4 Bridgend County Borough Bulletin: Winter 2006

Planning Issues

- 4.7 The Council endeavours to retain correspondence from the public which raises planning issues in their local area, including unsolicited requests for changes in a sites allocation or settlement boundaries etc. Whilst these cannot be considered to be duly-made representations to the Development Plan process, officers encourage the public to engage with the process at the most relevant time to affect the desired change in policy.
- 4.8 In addition, in carrying out consultation on the draft Delivery Agreement and Sustainability Appraisal Scoping Report, the Council received a number of responses highlighting Planning issues which concerned the public and other organisations. Additionally, during the Visioning and Strategic Options stage (see below), Stakeholders raised several further issues. These have been summarised in section 2.2 of the Pre Deposit Proposals document.

Visioning and Strategic Options

- 4.9 To inform the preparation of the Pre-Deposit Proposals, the Council published an initial draft Vision and 5 Strategic Growth Options. As part of the Pre-Deposit participation process the Council undertook stakeholder consultation on these.
- 4.10 The consultation on the draft Vision and Strategic Growth Options took the form of a dedicated LDP Key Stakeholder Forum meeting on the 28th June 2007 which was followed by a period for written comments to be made by the 10th August 2007.

- 4.11 The results of the consultation were report to Bridgend County Borough Council at its meeting of the 29th November 2007. This report is reproduced at Appendix C and includes a report of the LDP Stakeholder Forum (including presentations) and a matrix of responses to all the representations received.
- 4.12 The purpose of this consultation was to receive feedback on the general thrust and direction of the Plan at this early stage of preparation. The number of written responses received was limited.

Pathway to Pre Deposit Proposals

- 4.13 Subsequent to the above consultation the Pre-Deposit Proposals document was formulated over a period of 15 months. This involved input and guidance from the Welsh Assembly Government as well as consultants acting as 'critical friends' to appraise the elements of the document as it was emerging.

5. Pre Deposit Proposals Consultation (Regulation 15)

- 5.1 In February – March 2009, Bridgend County Borough Council formally consulted on its Pre-Deposit Proposals for the Bridgend Local Development Plan (LDP). The Pre-Deposit Proposals identified the issues facing the County Borough leading to the development of the LDP Vision and a set of objectives required to achieve the Vision.
- 5.2 The Pre-Deposit Proposals considered various growth options and spatial strategies which are assessed to determine the most appropriate and sustainable way of achieving the LDP Vision and Objectives. The culmination of this process in the Pre-Deposit Proposals was the Preferred Strategy and Strategic Policies which form the development framework and basis for meeting the key economic, social and environmental needs of the County Borough over the Plan period up to 2021.

Consultation Methods

- 5.3 Bridgend County Borough Council approved the LDP Pre-Deposit Proposals document for consultation on 11th December 2008.
- 5.4 The consultation period began on Thursday 12th February and ended on Tuesday 31st March 2009.
- 5.5 The package of consultation documents comprised: (See Appendix D for evidence):
- Bridgend LDP Pre-Deposit Proposals (December 2008)
 - Sustainability Appraisal of the Bridgend Local Development Plan Pre-Deposit Proposals
 - Sustainability Appraisal Non-Technical Summary
 - Habitats Regulations Assessment of the Bridgend Local Development Plan Pre-Deposit Proposals – Screening Assessment
 - *Planning Our Future* – Summary Newsletter
 - Representation Form

Notifications and Publicity

- 5.6 A CD containing the complete package of consultation documents (see above) was sent to all the specific consultees listed in Appendix 4 of the Bridgend LDP Delivery Agreement. 4 Hard Copies of all the documentations were sent to the Welsh Assembly Government.
- 5.7 A notification letter was sent to approximately 1,000 individuals and organisations listed in the LDP Consultation database. This letter described the purpose of the consultation, where more information

could be obtained and how representations could be made. A representation form was also enclosed.

- 5.8 Public Notices were placed in the Glamorgan Gazette on the 12th and 19th February 2009. A media release was also distributed to all local and regional newspaper, radio and television organisations.
- 5.9 A copy of the LDP Newsletter, *Planning Our Future*, was distributed to all households in the County Borough. This summarised the contents of the Pre-Deposit Proposals and outlined where more information could be viewed and how representations could be made.
- 5.10 A series of exhibitions and drop-in sessions were held throughout the County Borough during the first fortnight of the consultation period. These included utilising busy town centre locations on Saturdays (including a stall at the Bridgend Valentine's Fayre). At least one exhibition and one drop-in session were held in each of the LDP Sub-Areas. Both the exhibitions and drop-in sessions were staffed by officers from the Council who could answer specific questions and offer advice on how to formally respond.



Figure 1 Exhibition at Bridgend Valentine's Fayre

- 5.11 Before each drop-in session within each sub-area, local County Borough Council Members and Members of local Town and Community Councils were invited to attend a briefing session on the Pre-Deposit Proposals. This would enable them to answer queries from their local constituents on how the proposals would affect their local area.
- 5.12 With the help and assistance from the Council's Communities First teams, 10 local exhibitions were held in the Cornelly, Caerau, Llangeinor, Bettws, Sarn and Wildmill wards of the County Borough.
- 5.13 The package of consultation documents were made available on Bridgend County Borough Council's website: www.bridgend.gov.uk, including direct links from the homepage and the Planning Department pages. A facility was also made available where respondents could

complete an online form to make representations. Approximately 1,000 'hits' were received by the webpage during the consultation period.

- 5.14 Hard copies of all the consultation documents were placed at 'deposit' locations which included every library in the County Borough (including the mobile libraries) as well as the Customer Service Centre at the Council's Civic Offices in Angel Street, Bridgend.



Figure 2: Online Consultation

- 5.15 Each of the secondary schools in the County Borough and Bridgend College were directly contacted and invited to take part in the consultation process. This was offered in a number of ways including: making available exhibition material, questionnaires and newsletters within the schools, using in-house publicity mechanisms such as web-sites and internal newsletters etc, and arranging for small groups of pupils and classes to visit the community exhibitions and/or drop-in sessions. Whilst responses to the invitations were limited, pupils from the Porthcawl and Maesteg areas attended the exhibitions held in their area to find out more about proposals.

Consultation Responses

- 5.16 The results of the consultation and how the feedback was to be used to inform the contents of the deposit LDP were reported to Bridgend County Borough Council at its meeting of the 7th October 2009. This report is reproduced at Appendix D and includes a matrix of responses

to all the representations received as well as the consultation evidence highlighted above.

LDP Stakeholders

- 5.17 A meeting of the LDP Stakeholder Forum was convened on the 11th February 2009 at Bridgend Rugby Club. The purpose of the meeting was to outline and discuss the contents of the LDP Pre-Deposit Proposals including the Preferred Strategy.
- 5.18 The role of those delegates attending the meeting was to represent the views of their organisation / group for the purposes of round table discussions on the contents of the Pre-Deposit Proposals. It was then for the delegates to be responsible for the dissemination of information from the meeting to members of their respective group / organisation.
- 5.19 In total 71 delegates, representing 32 organisations attended the meeting.



Figure 3: LDP Key Stakeholder Forum Meeting: 11th February 2009

- 5.20 A report which includes copies of the presentation given, notes of the discussion which took place and the Council's initial responses to points that have been made is included within Appendix D.

Written Responses

- 5.21 In total, 177 responses were received from specific consultees, organisations and individuals. Summaries of the all the responses received are included within Appendix D. These are accompanied by the Council's response and identified actions for the Deposit LDP.
- 5.22 **It is important to note that, as further evidence base work will continue up until the deposit of the LDP, the Council's comments and the identified actions are an initial response to comments made and should not be construed as a commitment on behalf of Bridgend County Borough Council to change the Preferred Strategy in any way.**

Identified Actions for the Deposit LDP

- 5.23 Taking into account those comments made at the LDP Stakeholder Forum, together with those from the Specific Consultees and other individual / organisations, the Council identified a number of Actions for further consideration and the requirement for additional work to be undertaken to fully inform the Deposit LDP. These have been outlined below and are accompanied by information outlining the work undertaken since the Pre-Deposit Proposals consultation.

Environment

Issue Raised During Pre-Deposit Proposal Consultation	How this Issue is Addressed in the Deposit LDP
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The Council will consider including reference in the LDP Vision to acknowledge the need to protect and enhance the environment which is identified as a strategic objective.	Reference to the environment has now been included in the LDP Vision. (Section 2.1 of the LDP refers)
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The results of an analysis of Open Space will be included in the Deposit LDP, in accordance with the requirement of TAN16.	Updated recreation open space audits were adopted in 2010. These together with other supporting policy guidance relevant information held by the Council informed the outdoor recreation facilities Policies COM11, COM12, COM13 and COM14.
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Implications arising from Strategic Noise Maps for road, rail and settlement areas will be taken account of in the Deposit LDP where appropriate.	Noise pollution is taken into account from developments by provisions in Policies SP2 and ENV7.
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A Strategic Flood Consequences Assessment (SFCA) is currently being undertaken and will inform the Deposit LDP.	The SFCA was published in October 2010.
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The existing Special Landscape Areas of the County Borough are currently being reviewed against a regionally-agreed methodology using data from LANDMAP. These updated areas will be included within the Deposit LDP.	The updated Special Landscape Area (SLA) assessment was published in March 2010. SLAs are allocated in the LDP by Policy ENV3.
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Issue Raised During Pre-Deposit Proposal Consultation

How this Issue is Addressed in the Deposit LDP

The Council is currently undertaking an assessment of allotment land in the County Borough and is likely to develop an Allotment Strategy as part of the wider assessment of Open Space, the results of this will be used to inform the Deposit LDP.

The Allotment Audit was undertaken in 2009. The Council's Allotment Strategy was published in 2010. Policy SP13 seeks to retain and enhance allotments. Policy COM14 of the LDP allocates new sites for allotments and market gardens, whilst Policy COM7 protects against their loss.

The Council will be reviewing existing settlement boundaries for inclusion in the Deposit LDP.

All settlement boundaries have been reviewed and are allocated by Policy PLA1 of the LDP. The review process is outlined in the Settlement Boundary background paper.

The Council currently pursues a policy of designating Green Wedges between settlements in order to protect their identity. These designations will be reviewed for inclusion in the Deposit LDP.

All green wedges have been reviewed and are allocated by Policy ENV2 of the LDP. The review process is outlined in the Green Wedges background paper.

In line with emerging national planning policy on the use of the Code for Sustainable Homes in new housing development it seems a sensible suggestion to monitor the number of dwellings built to different code levels. This will be included in the Deposit LDP.

TAN22: Sustainable Buildings states that the Welsh Assembly Government will monitor the construction of housing built to the Code for Sustainable Homes standards. The Department for Communities and Local Government also publish this data on a quarterly. Given this, it is now not considered necessary for the LDP to monitor the situation.

Employment / Household Projections and Sites

Reference to, and the implications of, the new 2006-based household projections will be included in the Deposit LDP.

Since the Pre-Deposit Proposals consultation 2008-based population and household projections have been published. These are referred to in the

The Council acknowledges that there is currently an apparent incompatibility between the

Cambridge Econometrics report: *Examining Alternative Demographic and Labour Market*

Issue Raised During Pre-Deposit Proposal Consultation

How this Issue is Addressed in the Deposit LDP

employment forecasts in the LDP Trend Based Growth option (produced the Chelmer Population & Housing Model) , and the employment forecasts undertaken by Cambridge Econometrics for Bridgend County Borough Regeneration Strategy “Fit for the Future” detailed in table 7.1 of the Pre-Deposit Proposals (PDP). Further work is being undertaken to examine these relationships. Details of the outcome of this work will be included in the Deposit LDP.

Projections and the Population and Housing Background Paper which have been used to inform the growth levels in the LDP.

This report also included revised economic and employment projections which have been used to balance the housing and employment requirements.

The precise distribution of employment and housing land will be included in the Deposit LDP.

These are outlined in Policies COM1, COM2, SP9 and REG1. The distribution is summarised in table 3.1 of the LDP.

Site viability will be an important factor when allocating sites for development in the Deposit LDP, the Council will be undertaking site viability assessments to inform this process.

An Affordable Housing Viability Study was published in June 2010 and has been used to inform Policy COM5. The realistic delivery of sites is set out in section 9 of the LDP.

The Local Housing Market Assessment (LHMA) is currently being prepared and its results and implications for planning policy will be included in the Deposit LDP.

The LHMA was published in December 2009. This has been used to inform Policy COM5.

An assessment regarding Gypsy and Traveller Accommodation has recently been commissioned. The results and implications of this study will be included in the Deposit LDP.

The Gypsy and Traveller Accommodation Assessment was published in March 2010. This has been used to inform Policy COM6.

The housing supply generated by Candidate Sites that are proposed to be included in the Plan will be confirmed in the Deposit LDP.

Those residential Candidate Sites which were required to meet the growth projections outlined in the LDP and considered acceptable under the Candidate Site Assessment procedure, have been allocated by Policies COM1 and COM2.

Issue Raised During Pre-Deposit Proposal Consultation

How this Issue is Addressed in the Deposit LDP

Reference will be made to individual housing site figures in the Deposit LDP. In addition, non-strategic sites for housing that meet the requirements of the Preferred Strategy will also be identified in the Deposit LDP.

Further details of the assessment are included in the Candidate Sites Assessment Report.

These are included in Policies COM1 and COM2.

Community Uses

Where identified, the land-use requirements of health facilities will be earmarked in the Deposit LDP.

These are included in Policy COM8

NHS Modernisation will enhance community facility provision even if this involves the closure of some not fit-for-purpose buildings. However this may be clarified by changing the phrase "community facility" to "community facility provision" in the policy.

Policy SP14 has been amended since the Pre-Deposit Proposals stage and it is now worded to include a range of community facility provision which it, and the detailed community use policies, cover.

Retailing and Commercial Centres

A review of the role and accessibility of District Centres and their boundaries will be evidenced for the Deposit LDP.

The revised retail hierarchy is included at Policy SP10. This has been informed by a review of the retail centre designations and boundaries in the Retail Review Background Paper.

The Deposit LDP will contain policies which facilitate the required quantum of retail development for the Plan Period, and associated policies will allow for flexibility if this situation changes.

Updated retail need figures provided by CACI Ltd were published in June 2010. Policies REG9 and REG11 provide sites to meet this need. Other policies in the LDP and national retail planning policy.

Issue Raised During Pre-Deposit Proposal Consultation

How this Issue is Addressed in the Deposit LDP

Minerals

Issues regarding a 500m mineral buffer zone will be covered in policies in the Deposit plan.

This is included at Policy ENV11.

National planning policy requires the Council to identify coal resources that are present in the County Borough. These will be identified in the Deposit LDP.

Primary and secondary Coal reserves are safeguarded by Policy SP6 of the LDP. The resources themselves are identified on the Proposals Map.

The mining legacy of the County Borough is referenced in paragraph 3.2.4 of the Pre-Deposit Proposals, and will be considered in future landscape assessment work.

The mining landscape legacy of the County Borough was taken into account in the LANDMAP assessment used to inform the identification of SLAs.

The Council is aware of the requirements of national policy in relation to mineral resources, including the safeguarding of limestone and coal resources, and this will be reflected in the Deposit LDP.

Mineral resources are safeguarded by Policy SP6 of the LDP. The resources themselves are identified on the Proposals Map.

The suggested amendment to state that Coal is present in the centre and north of the County Borough is accepted and will be included in the Deposit LDP.

The wording of Policy SP6 has now changed to omit the geographical references to the coal resource. However primary and secondary coal reserves are still safeguarded by Policy SP6 of the LDP. The resources themselves are identified on the Proposals Map.

Aggregate resources will be safeguarded in the Deposit LDP and a criteria based policy included to assess any mineral proposals.

Mineral resources are safeguarded by Policy SP6 of the LDP. The resources themselves are identified on the Proposals Map. A criteria based policy for minerals developments is included at Policy ENV12.

Policies will be revised in accordance with the final coal TAN which has now been issued.

This has been undertaken and is reflected in section 4.3 of the LDP.

Issue Raised During Pre-Deposit Proposal Consultation

How this Issue is Addressed in the Deposit LDP

Regeneration

The land use implications and requirements of any regeneration programmes / strategies will be reflected where appropriate in the Deposit LDP.

These are referenced throughout the LDP.

Tourism

The Council agrees with the suggestion to replace 'green' and 'eco' tourism with 'sustainable' tourism and will make the necessary changes in the Deposit LDP.

This is included at Policy SP11.

Unstable Land

Unstable land will be the subject of a specific policy in the Deposit LDP.

This is included at Policy ENV13.

Transportation

National planning states that disused railways should be safeguarded from development where there is a realistic prospect for their use for transport purposes in the future. A policy to protect such routes will be considered for inclusion in the Deposit LDP.

This is included at Policy PLA11.

The land-use implications of the Council's Rights of Way Improvement Plan will be used to inform the Deposit LDP.

This is included at Policy PLA10.

Energy

In the case of the Strategic Search Areas identified in TAN 8: Renewable Energy, the 2006 refinement exercise forms part of the evidence base to the LDP and will be used to inform policies and

This is included at Policy ENV18.

Issue Raised During Pre-Deposit Proposal Consultation

How this Issue is Addressed in the Deposit LDP

allocations within the Deposit LDP.

Other

It is open to the Council to review existing UDP allocations in light of relevant evidence and any new land use designations will be set out in the Deposit LDP.

The Council considers that the LDP Vision / objectives can be achieved by the Strategic Policies, which are to be monitored. However the objectives will be reviewed for the Deposit LDP to assure that there are no inconsistencies or conflicts between them and that they are properly linked and prioritised.

The Council will re-examine the appropriateness of the wording of specific objectives and strategic policies.

The Council agrees that the Deposit LDP should be based on a sound evidence base and that the Preferred Strategy is sufficiently flexible and deliverable. The Council will ensure all the identified actions highlighted by the Welsh Assembly Government are considered, implemented and developed through a robust evidence base for the Deposit LDP and its supporting documentation.

The Council agrees that, when drafting the Deposit LDP, it will take into account updated information and references highlighted in the responses from the Environment Agency Wales and the Countryside Council for Wales.

The revised allocations and designations are included in the LDP.

The vision and objectives of the LDP have been reviewed. The objectives have been linked to the issues identified which, in-turn, have also been linked to the Strategic Policies.

The Strategic Policies are to be monitored through the framework outlined in section 7 of the LDP.

Various amendments and alterations have been made to the wording of strategic policies.

The Council has significantly expanded its evidence base since the publication of the Pre-Deposit Proposals.

The various comments and suggestions from the Welsh Assembly Government have been taken into account and, where necessary, changes have been made to the plan and its policies to reflect these.

The various comments and suggestions from the Environment Agency Wales and the Countryside Council for Wales have been taken into account and, where necessary, changes have been made to the plan and its policies to reflect these.

Issue Raised During Pre-Deposit Proposal Consultation

How this Issue is Addressed in the Deposit LDP

Concerns raised regarding how the SA / SEA and HRA processes have been integrated into the plan making process to date will be addressed by including a 'change log' in a further consultation report as suggested by the Council's consultants to support the Deposit LDP and the full SA / SEA and HRA.

The SA / SEA / HRA for the LDP have been devised following an iterative process once a working draft of the document was produced by Council Officers. Changes which have been made to the LDP as a result of initial versions of the SA / SEA / HRA are documented in a 'Changes Log' report which is available separately.

The Countryside Council for Wales and the Environment Agency Wales have been consulted informally both in terms of the draft LDP and the initial HRA of the Plan.

- 5.24 It should be noted that the above should not be viewed as a definitive list of actions as further work was required as work on the LDP progressed.

6. Post Pre-Deposit Consultation: Formulation of Deposit LDP (Regulation 16)

Candidate Site Assessment Procedure and Consultation

- 6.1 To assess the Candidate Sites which were submitted earlier in the process (see above), the Council developed a site assessment procedure, which will be applied to all of the Candidate Sites contained in the Register, together with any additional sites which may have emerged from ongoing evidence gathering exercise, technical studies undertaken by, or on behalf of, the Council, and those unimplemented sites allocated within the Bridgend Unitary Development Plan (UDP).
- 6.2 The Candidate Sites were to be assessed in a 4 stage process: 1) Initial Site Assessment; 2) Detailed Site Assessment – in terms of deliverability suitability and sustainability; 3) Consultation with appropriate consultation bodies; and 4) Potential Sites allocated in the Deposit LDP.
- 6.3 LDP regulations did not require the Council to consult on the Candidate Site Assessment Procedure. However it was considered appropriate to conduct a limited informal consultation exercise to provide transparency on the assessment procedure and ascertain views and opinions to inform and adjust the process if considered appropriate.
- 6.4 The consultation period began on Friday 23rd October 2009 and ended on Friday 20th November 2009.
- 6.5 The Council undertook the following actions:
 - Placed the draft Candidate Site Assessment Procedure on the Council's website, at the Council's Offices and all public libraries throughout the County Borough.
 - Dispatched 4 copies of the draft Candidate Site Assessment Procedure to the Welsh Assembly Government.
 - Informed all of the Specific Consultation Bodies listed in Appendix 4 of the Delivery Agreement of the availability of the draft Candidate Site Assessment Procedure for comment.
 - Informed all other consultees contained in Appendix 4 of the Delivery Agreement and the LDP database of the availability of the draft Candidate Site Assessment Procedure for comment.
- 6.6 At the close of the consultation the Council had received 27 responses. The responses were used to inform changes to the assessment procedure which will be published alongside the results of the assessment with the deposit LDP.

Candidate Site Consultation

6.7 The Local Planning Authority undertook Stage 1 of the Candidate Site Assessment process which has reduced the number of sites to approximately 150. As part of the assessment procedure consultation was undertaken with the following departments / bodies to ascertain their views on these sites:

- Countryside Council for Wales (CCW)
- Environment Agency Wales (EAW)
- Glamorgan Gwent Archaeological Trust (GGAT) (for Cadw)
- Dwr Cymru Welsh Water
- Wales and West Utilities
- Western Power Distribution
- Coal Authority
- BCBC Transportation and Highways Department
- BCBC Countryside and Tourism Section
- BCBC Public Protection Department
- BCBC Land Drainage Section

6.8 The comments received were used to inform the assessment process and further information can be found in the Candidate Site Assessment report.

Evidence Base Consultation

6.9 Many of the documents which form part of the LDP evidence base have been subject to consultation with relevant stakeholders prior to their publication. The documents were also reported to the LDP Steering Group for information, prior to their publication. Details are provided in Table 6.1 below. Specific information is included within each report which is available to view on the Council's website.

Evidence Base Document	Consultation Details	LDP Steering Group Date
Local Housing Market Assessment	A first stage of separate stakeholder and community consultation events was held in March 2009 to introduce the study and to allow stakeholders and local residents to highlight any initial areas of interest and concern. A second stage of consultation events with stakeholders, community members and Elected Members was held during September 2009, where findings of the draft LHMA were presented and discussed.	Cabinet 12 January 2010
Gypsy Traveller Accommodation Study	Initial consultation workshops were undertaken with local authority officers working with Gypsies and Travellers and related issues. Nine interviews were conducted with Gypsies and Travellers and the information supplied used to inform the study.	Cabinet 12 January 2010

Settlement Role and Function Study	This is a factual report. No consultation required.	8 April 2010
Designation of Special Landscape Areas	An internal Officer workshop was held with staff from Development Planning, Development Control, Highways (Rights of Way) and Countryside and Tourism to discuss the initial candidate SLAs and the final recommended areas.	3 June 2010
Employment Land Availability Study 2009	Annual meetings are held between officers from Development Planning and Economic Development to discuss the annual employment land survey and agree the status of sites.	29 April 2010
Examining Alternative Demographic and Labour Market Projections	This is a factual report. No consultation is required.	3 June 2010 Council 23 June 2010
Joint Housing Land Availability Study	Annual JHLAS meetings are held between WAG, BCBC, RSLs, House Builders and statutory undertakers to discuss the annual residential land bank survey and agree the status of sites.	3 June 2010
Retailing and Commercial Centres in Bridgend County Borough 2009	Input from local agents and relevant internal Council departments were collated to inform the findings of this report.	3 June 2010
Employment Land Review	A business survey was carried out with over 1,000 companies in the County Borough to inform the findings of the review. Local agents were also contacted for their views on the current and future employment markets in the area. An internal steering group comprising officers from Development Planning, Economic Development and Property reviewed and commented on the report prior to publication.	1 July 2010
Retail Needs Planning Study Update June 2010	This is a factual report. No consultation is required.	29 July 2010
Affordable Housing Viability Study	A workshop was held with BCBC planning and property officers, house builders and RSLs to agree the methodology used in the viability study.	23 September 2010
Recreation Space Audits	This is a factual report. No consultation is required.	18 November 2010
Strategic Flood Consequences Assessment of Bridgend County Borough	Environment Agency Wales was consulted throughout the process of formulating the SFCAs. With an opportunity to comment on the final draft document before it was published.	16 December 2010
Bridgend Renewable Energy Assessment	An internal stakeholder workshop was held with officers from Development Planning, Development Control, Sustainable Development, the Energy Unit, Public Protection and Waste to agree the methodology and assumptions used in the assessment. There was also an opportunity to comment on the final draft report.	10 March 2011

7. Deposit Consultation (Regulation 17)

- 7.1 The contents of this report will be updated following Deposit Plan consultation.

APPENDIX A

643643

Development Planning

31A158/SJ/HL

Date as Postmark

Dear Sir / Madam

**RE: BRIDGEND LOCAL DEVELOPMENT PLAN (2006-2021)
DRAFT DELIVERY AGREEMENT
DRAFT SUSTAINABILITY APPRAISAL SCOPING REPORT**

In accordance with the requirements of the Town and Country Planning (Local Development Plans) (Wales) Regulations 2005 the Council has embarked on the preparation of the Local Development Plan (LDP), which will set out the Council's strategic vision for the use of land and its contribution to other high level objectives up to 2021. The LDP will replace the currently adopted Bridgend Unitary Development Plan (UDP) and become the 'Development Plan' in legal terms for the determination of planning applications.

As a first step in the LDP preparation process the Council must prepare a Delivery Agreement, which is a public statement that sets out the Council's Timetable for plan preparation and how it will involve stakeholders and the community in preparing the LDP through a Community Involvement Scheme (CIS).

It is also a requirement that the LDP should contribute towards the achievement of sustainable development. It is important that a Strategic Environmental Assessment (SEA) and Sustainability Appraisal (SA) is undertaken at every stage of LDP plan preparation and is the subject of stakeholder and public consultation throughout, including the initial scope of the appraisal.

The Draft Delivery Agreement and Draft Sustainability Appraisal Scoping Report have been approved for consultation. Both documents are available for inspection on the Council's website at www.bridgend.gov.uk (click on the Consultation pages), and at the Civic Offices and Public Libraries throughout the County Borough. Copies of the documents may also be purchased from my offices at the cost of £5.00 per copy.

Should you wish to comment, I enclose the relevant representation forms. Welsh language versions of the Representation forms are available from my offices together with any additional forms, on request. Representations on the Draft Delivery Agreement and

the Draft Sustainability Appraisal Scoping Report should be received either in writing or submitted electronically on-line (see above) by the 8th September 2006.

If you have any queries please contact the Development Planning Team on telephone numbers 01656 643162, 643165, 643169, 643193, who will be pleased to assist you.

Yours faithfully

for **Assistant Director, Planning Services**

Media Release

I'r Cyfryngau



REF: MR25.07.06FM

25 July 2006

Have Your Say On The LDP

Now is your opportunity to have your say on how planning issues will shape Bridgend County Borough for years to come, impacting on land for housing, employment, retail, education and use of open spaces.

Bridgend County Borough Council has begun preparing a Local Development Plan (LDP), which will take over from the Unitary Development Plan (or UDP).

The plan will set out land-use planning policies in the county borough which are used to determine planning applications and to allow development.

The plan could potentially have a direct effect on the lives of every resident of the county borough as well as having major implications for landowners.

The first stage of preparation is to agree a LDP Delivery Agreement with the Welsh Assembly Government. The draft Delivery Agreement sets out a Community Involvement Scheme up to 2010 and outlines how the public will be involved in the preparation of the plan.

The Council is now consulting with the public and key stakeholders to seek views on the draft Delivery Agreement before submission to the Assembly. Views are also being sought on a Sustainability Appraisal Scoping Report, to ensure the plan is as far as possible, environmentally friendly.

The Consultation runs from 3 August 2006 to 8 September 2006. The documents are available to view online on the council's website, at all libraries in the county borough and at the council's civic offices.

The next stage will then be for the council to receive views on the plan's overall development strategy, before it formulates specific policies and allocates land.

For more information on LDP preparation or on this consultation phone (01656) 643165/3162, email developmentplanning@bridgend.gov.uk or log on to www.bridgend.gov.uk.

Ends

For more information please contact the Public Relations team on (01656) 643663, 643217 or 643210. Website: www.bridgend.gov.uk Email: talktous@bridgend.gov.uk

**BRIDGEND COUNTY BOROUGH COUNCIL – CYNGOR BWRDEISTREF SIROL
PEN-Y-BONT AR OGWR**

*Planning and Compulsory Purchase Act 2004
Environmental Assessment of Plans and Programmes (Wales) Regulations
2004*

Notice of consultation

BRIDGEND LOCAL DEVELOPMENT PLAN

**DRAFT DELIVERY AGREEMENT
DRAFT SUSTAINABILITY APPRAISAL SCOPING REPORT**

Copies of these documents are available for inspection at the **Planning Department**, Civic Offices, Angel Street, Bridgend, CF31 4WB; on the Council's web site: www.bridgend.gov.uk; and at the following other locations in Bridgend County Borough during normal working hours* from 3rd August 2006:-

- Aberkenfig Library**, Heol y Llyfrau, Aberkenfig, Bridgend
- Betws Library**, Betws Centre, Betws, Bridgend
- Blaengarw Library**, Blaengarw Infants School, Station Street, Blaengarw, Bridgend
- Bridgend Library**, Wyndham Street, Bridgend
- Bridgend Mobile Library**
- Caerau “Cyberlink” Library**, Noddfa Chapel Centre, Caerau Road, Caerau, Maesteg
- Evanstown Library**, Community Centre, Dunraven Place, Evanstown, Tonyrefail
- Maesteg Library**, North's Lane, Maesteg
- Nantymoel Library**, Berwyn Centre, Ogwy Street, Nantymoel, Bridgend
- Ogmore Vale Library**, Ogmore Valley Life Centre, Cwrt Gwalia, Ogmore Vale, Bridgend
- Pencoed Library**, Penybont Road, Pencoed, Bridgend
- Pontycymer Library**, 107 Oxford Street, Pontycymer, Bridgend
- Porthcawl Library**, Church Place, Porthcawl
- Pyle Life Centre**, Helig Fan, Pyle, Bridgend
- Bridgend Reference and Information Centre**, Coed Parc, Park Street, Bridgend
- Sarn “Cyberlink” Library**, Sarn Life Long Learning Centre, Merfield Close Sarn, Bridgend.

(*Normal working hours of the Council are Monday – Thursday 8.30am – 5.00pm, Friday – 8.30am – 4.30pm. Opening hours for the individual libraries can vary on a daily basis, consequently you are advised to consult the relevant library to ascertain when it is open in order to inspect the documents.)

Representations in respect of the contents of the Draft Delivery Agreement and Draft Sustainability Appraisal Scoping Report should be sent in writing to Mr. Martin Hooker, Assistant Director of Planning Services, Civic Offices, Angel Street, Bridgend, CF31 4WB, **before 4.30pm Friday 8th September 2006**. Representations should specify the matters to which they relate and the grounds on which they are made. They may be accompanied by a request to be notified at a specified address of future Local Development Plan consultation.

Rhodri-Gwynn Jones BSc, C.Eng., M.I.C.E.
Director of Environmental and Planning
Services,
Bridgend County Borough Council,
Civic Offices, Angel Street,
BRIDGEND CF31 4WB.

Rhodri-Gwynn Jones BSc, C.Eng., M.I.C.E.
Cyfarwyddwr Gwasanaethau
Amgylcheddol a Chynllunio,
Cyngor Bwrdeistref Sirol Pen-y-bont ar
Ogwr,
Swyddfeydd Dinesig, Stryd yr Angel,
PEN-Y-BONT AR OGWR, CF31 4WB.

DATED 31/07/2006

DYDDIAD 31/07/2006

[Home](#) > LDP Delivery Agreement Introduction



Bridgend Local Development Plan: Draft Delivery Agreement

Introduction

The LDP will set out the land-use planning policies of the County Borough which are used in the determination of planning applications and to facilitate new development. These policies include land-use allocations for different types of development (i.e. housing, employment, retailing, education, open space etc.) as well as criteria for assessing individual proposals. Potentially the Plan has a direct effect on the lives of every resident of the County Borough as well as major implications for landowners.

Bridgend County Borough Council has embarked upon the first formal consultation process of the Bridgend Local Development Plan (LDP) and is asking for your views on the draft Delivery Agreement.

The draft Delivery Agreement, the first step of LDP preparation sets out a Community Involvement Scheme (CIS) and a Timetable for Preparation. The CIS outlines how the public will be involved in the preparation of the Plan.

Please note this consultation is being undertaken simultaneously with Consultation on the Bridgend LDP Draft Sustainability Appraisal Scoping Report.

Background to the Proposal

The draft Delivery Agreement is available to [read here](#).

The Bridgend Local Development Plan draft Delivery Agreement aims to:

- Show that Bridgend County Borough Council is meeting the legal requirements for the delivery of its new Local Development Plan;
- Set out how the local planning authority's strategy for community involvement and its links to other community involvement initiatives;
- Identify in general terms which local community groups and other bodies need to be consulted;
- Show how local people, community groups and other bodies can be involved in a timely and accessible manner;
- Show that the methods to be used to involve local people, community groups, and other bodies are suitable for the different stages of the Local Development Plan and for particular communities;
- Show the local planning authority can resource and manage the process effectively;
- Show how the results of community involvement are to be fed in to the preparation of the Local Development Plan and Supplementary Planning Guidance; and
- Set out the mechanisms for reviewing the relevant procedures.

Read the [full document here](#)

Consultation Methods

1. [The Planning Department](#)

Civic Offices

Angel Street

Bridgend

CF31 4WB

Hard copies of the draft Delivery Agreement are available to inspect at the Planning Department reception. Normal working hours of the Council are: Monday - Thursday, 8.30am - 5.00pm and Friday, 8.30am - 4.30pm

1. [Libraries](#)

The draft Delivery Agreement is available to view in [every library within the County Borough](#) (including the mobile library). [Opening hours](#) for the individual libraries will vary.

1. [Online](#)

The text of the draft Delivery Agreement, along with other background information related to the LDP can be viewed online in the [Local Development Plan section](#) of this website.

1. [Purchase the document](#)

Copies of the draft Delivery Agreement may also be purchased from the Planning Department at a cost of £5 (cheques made payable in advance to 'Bridgend County Borough Council' or to purchase using a debit/credit card by telephoning (01656) 643165 - credit card minimum spend: £10).

How do you make your views known?

A [representation form](#) and guidance notes are available online to download, print and send to us electronically as well as in paper format from the Planning Department and at the Libraries.

An [online representation questionnaire](#) to fill in and electronically submit to the Council is available.

Email representations should be sent to developmentplanning@bridgend.gov.uk

Representations should specify the matters to which they relate and the grounds on which they are made. They may be accompanied by a request for you to be notified at a specified address / email of LDP preparation progression.

Consultation Period

The consultation period on the draft Delivery Agreement is from 3 August 2006 to 8 September 2006.

All representations on the draft Delivery Agreement must be received at the Planning Department either in writing or electronically before 4.30pm on Friday 8th September 2006. Any comments received after that deadline will not be accepted.

Please post your representations to:

Mr Martin Hooker
Assistant Director - Planning Services,
Bridgend County Borough Council,
Civic Offices,
Angel Street,
Bridgend,
CF31 4WB.

Email: developmentplanning@bridgend.gov.uk

All representations received by the deadline will be acknowledged usually in the form you have submitted them (i.e. by email/writing).

What are the Next Steps?

After the close of the consultation period, the Council will consider each representation duly received and decide, in light of their content whether or not to amend the draft document accordingly. After the Delivery Agreement has been approved by the Council it will formally submit the document to the Welsh Assembly Government for agreement.

If you are not making representations to the draft Delivery Agreement, but would still like to be kept informed of LDP preparation progression, please contact the Development Planning Section of the Planning Department (details below).

Contact Details

Should you require any further information or assistance in respect of the LDP, please contact the [Development Planning Section](#) of the Planning Department either by email: developmentplanning@bridgend.gov.uk; by letter to the above address; or by telephone on any of the following numbers:

(01656) 643165 / 3162 / 3169 / 3193

Further information regarding the [Bridgend Local Development Plan](#) can be found within the [Planning Department](#) web pages.

Guidance issued by the Government on the preparation of Local Development Plans can be viewed at the [Welsh Assembly Government's website](#) (external link).

June 2006

Last Updated: 05/09/2006

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[Home](#) > LDP Sustainability Appraisal Scoping Report - Introduction

Bridgend Local Development Plan: Draft Sustainability Appraisal Scoping Report

Introduction

The LDP will set out the land-use planning policies of the County Borough which are used in the determination of planning applications and to facilitate development. These policies include land-use allocations for different types of development (i.e. housing, employment, retailing, education, open space etc.) as well as criteria for assessing individual proposals. Potentially the Plan has a direct effect on the lives of every resident of the County Borough as well as major implications for landowners.

The Draft Sustainability Appraisal (SA) Scoping Report incorporates the Strategic Environmental Assessment (SEA) and the Appropriate Assessment (AA) for the Bridgend Local Development Plan (LDP). It has been prepared by consultants Baker Associates to assist Bridgend County Borough Council in meeting the requirements of SA, SEA and AA of the LDP.

Please note this consultation is being undertaken simultaneously with consultation on the Bridgend LDP Draft Delivery Agreement.

Background to the Proposal

The draft Sustainability Appraisal Scoping Report is available to [read here](#).

The SEA Directive was incorporated into UK law in July 2004. The Directive applies to a range of plans and programmes, including Local Development Plans. The main aim and output of SEA is to ensure that the emerging plan is, as far as possible, environmentally-friendly; the procedural requirements of SEA are the means for achieving this. SEA extends the principles of Environmental Impact Assessment to the strategic level and for the purpose of the Bridgend LDP is incorporated into the Sustainability Appraisal (SA) process. The need for 'Appropriate Assessment (AA) of the Plan potentially arises as there are sites of international importance in the County Borough protected under the Habitats Directive.

It is the intention for the SA of the Bridgend LDP to be part of the preparation of the LDP from the outset and continue throughout the plan-making process, to ensure that every stage of LDP production is subject to SA, SEA and AA.

The draft scoping report is the first stage in the SA process, and allows relevant bodies an early input into the SA, in order to ensure agreement is reached on the appropriate methodology and approach for the appraisal and assessments. Therefore the information contained within it sets out a general picture of what the key sustainability issues are in the County Borough and how the appraisal will take these into account. The draft scoping report:

- provides information on the approach that is to be taken, including explanation of the relationship between the full SA and what has to be done to meet the requirements of the SEA and AA (per Directives)
- sets out baseline information for the LDP area, and wider area where necessary, and indicates what impact future Plan proposals may have on this baseline and key sustainability issues
- sets out suggested objectives for the SA/SEA/AA of the Plan
- suggests what is required at this stage for SEA from the 'Consultation Bodies'.

All bodies consulted as part of this consultation are asked to respond on whether the draft Scoping Report has identified the most significant sustainability issues in the area, and where relevant, to assist by providing or signposting any other information that may be of use in identifying the potential significant environmental impacts of the LDP. It would also be helpful for all bodies consulted to say whether they believe the approach set out for the SA of the LDP is appropriate.

Read the [full document here](#)

Consultation Methods

1. [The Planning Department](#)

Civic Offices

Angel Street

Bridgend

CF31 4WB

Hard copies of the draft Sustainability Appraisal Scoping Report are available to inspect at the Planning Department reception. Normal working hours of the Council are: Monday - Thursday, 8.30am - 5.00pm and Friday, 8.30am - 4.30pm

1. [Libraries](#)

The draft Sustainability Appraisal Scoping Report is available to view in [every library within the County Borough](#). (Including the mobile library) [Opening hours](#) for the individual libraries will vary.

1. [Online](#)

The text of the draft Sustainability Appraisal Scoping Report, along with other background information related to the LDP can be viewed online in the [Local Development Plan section](#) of this website.

1. [Purchase the document](#)

Copies of the draft Sustainability Appraisal Scoping Report may also be purchased from the Planning Department at a cost of £5 (cheques made payable in advance to 'Bridgend County Borough Council' or to purchase using a debit/credit card by telephoning (01656) 643165 - credit card minimum spend: £10)

How do you make your views known?

An [SEA representation form](#) and guidance notes are available online to download, print and send in as well as in paper format from the Planning Department and at the Libraries.

An [online representation form](#) to fill in and electronically submit to the Council is available.

Email representations should be sent to developmentplanning@bridgend.gov.uk

Representations should specify the matters to which they relate and the grounds on which they are made. They may be accompanied by a request for you to be notified at a specified address / email of LDP preparation progression.

Consultation Period

The consultation period on the draft Sustainability Appraisal Scoping Report is from 3 July 2006 to 8 September 2006.

All representations on the draft Sustainability Appraisal Scoping Report must be received at the Planning Department either in writing or electronically before 4.30pm on Friday 8th September 2006. Any comments received after that deadline will not be accepted.

Please post your representations to:

Mr Martin Hooker
Assistant Director - Planning Services,
Bridgend County Borough Council,
Civic Offices,
Angel Street,
Bridgend,
CF31 4WB.

Email: developmentplanning@bridgend.gov.uk

All representations received by the deadline will be acknowledged usually in the form you have submitted them (i.e. by email / writing).

What are the Next Steps?

After the close of the consultation period, the Council will consider each representation duly received and decide, in light of the content whether or not to amend the draft document.

If you are not making representations to the draft Sustainability Appraisal Scoping Report but would still like to be kept informed of the progress of LDP preparation progression, please contact the Development Planning Section of the Planning Department (details below).

Contact Details

Should you require any further information or assistance in respect of the LDP, please contact the [Development Planning Section](#) of the Planning Department either by email: developmentplanning@bridgend.gov.uk; by letter to the above address; or by telephone on any of the following numbers:

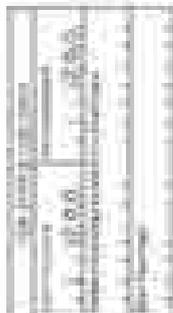
(01656) 643165 / 3162 / 3169 / 3193

Further information regarding the [Bridgend Local Development Plan](#) can be found within the [Planning Department](#) web pages.

Guidance issued by the Government on the preparation of Local Development Plans can be viewed at the [Welsh Assembly Government's website](#) (external link).

July 2006

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Bridgend Local Development Plan Draft Delivery Agreement Representation Form

Bridgend County Borough Council, Planning Services Department, P.O. Box 4
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INTRODUCTION

Bridgend County Borough Council has embarked upon the first formal consultation process of the Bridgend Local Development Plan (LDP) and is asking for your views on the draft Delivery Agreement.

The draft Delivery Agreement, the first step of the LDP preparation sets out a Community Involvement Scheme (CIS) and a Timetable for Preparation. The CIS outlines how the public will be involved in the preparation of the Plan.

The document can be viewed electronically online at the Council's website: www.bridgend.gov.uk (click on 'Consultation'). Hard copies are available to inspect at every library in the County Borough as well as at the Planning Department within the Civic Offices, Angel Street, Bridgend (where hard copies of the draft Delivery Agreement can be purchased). Copies of this form are also available from all the above locations and representations can also be made via an on-line form on the website.

If you wish to comment on the draft Delivery Agreement we would be grateful if you would use this form and that it is received in the Planning Department by 4.30pm on 8th September 2006. Any comments received after this deadline will not be accepted.

Hard copies of this form should be sent to: Assistant Director - Planning Services, Bridgend County Borough Council, Civic Offices, Angel Street, Bridgend, CF31 4WB.

After the close of the consultation period, the Council will consider those representations duly received by the deadline and decide, in the light of their content whether or not to amend the draft document accordingly. After the Delivery Agreement has been approved by the Council it will formally submit the document to the Welsh Assembly Government for agreement.

All representation details will be stored on a database for future consultation/notification purposes. The content of all representations will be made available for public inspection and will be placed on the Council's website. Therefore, you should not include confidential information in your comments.

Please complete in BLOCK CAPITALS and in Black Ink only. This form will be processed.

SECTION 1 - YOUR DETAILS

Name: _____
and/or Organisation: _____
Address: _____
Postcode: _____ Telephone No: _____ Fax No: _____
E-mail: _____ Please specify your preferred method of communication: Letter E-mail

SECTION 2 - AGENTS DETAILS

Name of Agent (if appropriate): _____
Person to Contact: _____
Address: _____
Postcode: _____ Telephone No: _____ Fax No: _____
E-mail: _____ Please specify your preferred method of communication: Letter E-mail

Note that Postage orders are included, all correspondence will be sent to the agent and not to the person/organisation given in Section 1.

BRIDGEND COUNTY BOROUGH COUNCIL
THIRD EXTRAORDINARY MEETING OF COUNCIL
05 OCTOBER 2006
PLANNING SERVICES

ITEM	SUBJECT	PAGE NO.
1	BRIDGEND LOCAL DEVELOPMENT PLAN (LDP) DRAFT DELIVERY AGREEMENT	2-10

1.1 Introduction

- 1.1.1 On the 28th July 2006 an Extraordinary Meeting of Council approved the draft Delivery Agreement and the draft Scoping Report for the Sustainability Appraisal of the Bridgend Local Development Plan for the purposes of future stakeholder and public consultation.
- 1.1.2 Both documents have since been the subject of a consultation exercise between 3rd August 2006 and 8th September 2006. During this time the documents, together with Representation Forms have been available online at the Council's website and hard copies have been available to inspect at every library in the County Borough as well as at the Planning Department within the Civic Offices (where hard copies have also been available for purchase at a cost of £5.00 per copy). It has also been possible to submit Representations directly online via the Council's website.
- 1.1.3 The consultation exercise also involved the dispatch of the draft documents together with the representation forms to all of the Specific Consultation bodies identified in the draft Delivery Agreement. In addition, all of the General Consultation bodies and other consultees contained on the Council's LDP database have been informed of the consultation exercise and comments and Representations have been invited.
- 1.1.4 The consultation on the draft Delivery Agreement and draft Scoping Report for the Sustainability Appraisal of the Bridgend LDP was also reported in the local press in the 2nd or 3rd weeks of August 2006 and publicised by Notice in the Glamorgan Gazette on the 3rd August 2006.
- 1.1.5 The Extraordinary Council of the 28th July 2006 also resolved to convene an early meeting of the 'LDP Key Stakeholders Forum' and this took place on 15th August 2006. Initial feedback from the 'Key Stakeholders Forum' was reported to the Cross Cutting Policy Forum on the 23rd August 2006.
- 1.1.6 On 28th October, the Cross Cutting Policy Forum received a Comprehensive Report on the consultation process, which is reproduced below. The Cross Cutting Policy Forum agreed the proposed changes to the Delivery Agreement and the additional actions and undertakings. The forum recommended that Council approve the Delivery Agreement for formal submission to Welsh Assembly Government.

1.2 Results of Consultation

- 1.2.1 In connection with the draft Delivery Agreement, the Council has received 30 duly made Representations. The details of each representation in response to the questions asked on the representation form are presented in tabular format together with the Council's response and proposed action points to the draft Delivery Agreement in Appendix 1. For

ease of reference the resultant changes to the draft Delivery Agreement are specified at section 1.3 of this report.

- 1.2.2 In addition, the Council received one late representation which has not been included in Appendix 1. However, the issues raised have been considered in the context of other representations received.
- 1.2.3 Appendix 2 to this report comprises an account of the LDP 'Key Stakeholder Forum' held on the 15th August 2006, which was convened to consider the draft Delivery Agreement and the draft Scoping Report for the Sustainability Appraisal of the Bridgend LDP. The report summarises the events of the day, highlights the issues raised at the meeting and recommends a number of action points and where necessary changes to the draft Delivery Agreement.
- 1.2.4 The Council has also received 29 duly made Representations to the draft Scoping Report for the Sustainability Appraisal of the Bridgend LDP. These together with the feedback from the 'Key Stakeholders Forum' meeting held on the 15th August 2006 have been dispatched to Baker Associates (independent specialist planning consultants engaged to assist in the Sustainability Appraisal process) for their further consideration. Any responses and recommended changes with respect to the draft Scoping Report for the Sustainability Appraisal of the Bridgend LDP will be reported back to the Cross Cutting Policy Forum and Council in due course. Members should be aware that a later and separate consideration of the consultation exercise relating to the draft Scoping Report will not delay the final approval of the Delivery Agreement, as it is not required to be submitted to the Welsh Assembly Government to be formally agreed.

1.3 **Changes to Draft Delivery Agreement**

1. Amend paragraph 2.6.1:
Delete "*The selective use of...*" and add the following new sentence at the end of the paragraph:
"SPG may be taken into account as a material consideration in the determination of planning applications"
2. Amend paragraph 3.4.2:
Add new sentence to end of paragraph:
"The Steering Group is politically balanced and consists of 14 Members of Bridgend County Borough Council. It is chaired by the Deputy Leader"
3. Amend Paragraph 3.4.5:
Add new sentence to end of paragraph:
"Membership of the Forum consists of partnership and representative organisations as well as certain Specific Consultation Bodies. This ensures that the Forum is of a manageable and effective size. It is envisaged that Forum

members will disseminate LDP information to the persons / organisations they represent to facilitate extended consultation using existing structures. If an organisation is not represented on the Forum, this does not preclude it from making direct representations to the Council.”

4. Amend paragraph 3.4.7:
Add new sentence to end of paragraph:

“The Council will endeavour to use, where possible, existing forums, partnerships and organisations.”

5. Amend Diagram 2:
Replace ‘SA’ and ‘SEA’ with ‘Sustainability Appraisal’ and ‘Strategic Environmental Assessment’ respectively.

6. Amend Table 1:
Delete table and replace with:

Stage 1	Review and Develop Evidence Base for LDP	April 2006 – June 2009
Stage 2	Delivery Agreement <i>Consultation Period</i>	April 2006 – January 2007 <i>August 2006 – September 2006</i>
Stage 3	Pre-Deposit LDP Participation & Consultation (Including Identification of Candidate Sites and Site Register) <i>Consultation Period</i>	October 2006 – June 2008 <i>October 2007 – December 2007</i>
Stage 4	Deposit LDP and Feedback <i>Consultation Period</i>	April 2008 – May 2009 <i>October 2008 – December 2008</i>
Stage 5	Advertisement of ‘Alternative Sites’ <i>Consultation Period</i>	April 2009 – June 2009 <i>April 2009 – June 2009</i>
Stage 6	Submission and Examination	July 2009 – July 2010
Stage 7	Inspectors Report	July 2010 – September 2010
Stage 8	Adoption	July 2010 – October 2010
Stage 9	Annual Monitoring Report and Review of LDP	October 2010 onwards

7. Delete paragraph 4.5.1 and replace with:

“The Council has established a Citizens Panel of 1,350 residents of the County Borough, selected to be statistically representative of the population, who help to inform decision-making on a wide range of issues. The results of previous and future surveys may be used to inform the evidence base of the LDP.”

8. Add new paragraph 4.9.2 to state:
”Where petitions are submitted with respect to consultation at the

key stages of LDP Plan preparation, a designated representative will need to be defined who will be the main point of contact in relation to the issues raised and have a right to be heard at any future examination”

Re-number existing paragraph 4.9.2 to 4.9.3

9. Add in Appendix 1, Stage 1:
In Column 4 insert: *“Citizens Panel”*
In Column 5 insert: *“Citizens Panel survey results”*
10. Add in Appendix 1, Stage 2, Column 3:
”5 week consultation period within August 2006 – September 2006”
11. Add to Appendix 1, Stage 3 (before Visioning and Strategic Options):
Add in Column 1 a new sub-stage: *“Identification of candidate sites and Publication of Site Register”*
Add in Column 2: *“As part of developing the evidence base, the Council will engage with stakeholders and the public in identifying candidate sites to produce a Site Register. Assessment criteria will be provided to facilitate this. The Site Register will be used to inform the Visioning and Strategic Options.*
Add in Column 3: *“Start: October 2006, Finish: June 2007”*
Add in Column 4: *“Development Planning Team, All Specific Consultation Bodies, UK Government Departments, General Consultation Bodies, Other Consultees (Including general public)*
Add in Column 5: *“Written Information dissemination via post and email, notices, website and press”*
Add in Column 6: *“Develop and produce a site register to inform the Visioning and Strategic Options”*
Add in Column 7: *“Development Planning Team, ICT Support, Printing Costs and Postage Costs”*
12. Amend Appendix 1, Stage 3:
Delete references to *‘Pre-deposit Plan’* and replace with *‘Pre-deposit Proposals documents’*
13. Add in Appendix 1, Stage 3, Column 3:
”6 week consultation period within October 2007 – December 2007”
14. Add in Appendix 1, Stage 4, Column 3:
”6 week consultation period within October 2008 – December 2008”
15. Amend Appendix 1, Stage 5, Column 3:
Delete *‘Start: April 2009, Finish June 2009’* and replace with: *“6 week consultation period between April 2009 – June 2009”*

16. Amend Appendix 1, Stage 6, Column 3
Delete 'October' and replace with 'November'
17. Amend Appendix 1, Stage 6: Column 4
Include after 'All Representors': 'Other Consultees and Stakeholders (including the general public)'
18. Amend Appendix 2 to reflect start date of October 2006 for stage 3. Pre-deposit LDP Participation and Consultation
19. Amend Appendix 4 as follows:-

Add note at bottom of Specific Consultation Bodies list to state:
"The Council will ensure it complies with the requirements of the 2004 Act and LDP Regulation 3 in relation to consultation with the above Specific Consultation Bodies and will add or amend the above list, subject to any further investigations or new information coming forward"

Add the following organisations to 'General Consultation Bodies':
 Bridgend Community Health Council
 Bro Morgannwg NHS Trust (delete from 'Other Consultees')
 Campaign for the Protection of Rural Wales (delete from 'Other Consultees')
 Council of Churches
 Bettws Boys and Girls Club
 Island Farm Action Group (IFAG)

Add the following organisations to 'Other Consultees':
 Women's Aid
 SEWTA
 Rhiw Shopping Centre (Management and Landowner)
 Divisional Police Headquarters
 Wildmill Residents Association
 Minerva Residents Association

Add EST to list of Local Transport Operators

20. Appendix 5 – Insert:

Plan or Strategy	Critical themes	Plan period	Consultation methods used or proposed
Bridgend Community Safety Partnership Crime and Disorder	Bridgend Community Safety Partnership aims to make Bridgend County Borough a safer place to live, work, visit and invest in. This will be achieved through agreed targets and performance management to reduce overall recorded crime by 17.5% by the end of March 2008. Addressing the issue of Community Safety requires a holistic approach, tackling the needs of both individuals and communities to enable them to feel safer and enjoy increased	2005 - 2008	No details of Consultation available

Plan or Strategy	Critical themes	Plan period	Consultation methods used or proposed
	<p>opportunities within their local communities. Consequently a wide range of agencies are represented within the Partnership to ensure a balanced approach to the issues of crime reduction, prevention and addressing social inclusion.</p> <p>The Bridgend Community Safety Partnership Crime and Disorder Strategy 2005-2008 sets out how the Partnership aims to address the Community Safety Agenda within the County Borough. Targets contained within Bridgend Community Safety Partnership Crime and Disorder Strategy are reflected by Home Office and locally agreed targets.</p> <p>Crime reporting, detection and conviction rates form a key element of the Crime and Disorder Strategy. Alongside these areas, issues including gender, race, disability, road safety, supporting vulnerable adults and alcohol related harm form an equally important part of the complete Community Safety agenda. To this end, the Crime and Disorder Strategy aligns closely with the joint Bridgend Community Strategy 2004-2016, Bridgend Health, Social Care and Well-Being Strategy 2005-2008 and Children and Young People's Partnership Framework.</p>		
Bridgend Young People's Partnership Strategy	<p>The key 'drivers' for the Bridgend Young People's Partnership are:</p> <ul style="list-style-type: none"> - Implementing the strategic (i.e. derived from the Framework) priorities, the national priorities identified by the Welsh Assembly Government and the local priorities identified by the young people themselves. - Ensuring every young person in Bridgend County Borough can access the Universal Entitlement. <p>The implementation of this strategy and its accompanying action plan may have resultant effects on land-use and hence the LDP.</p>	2004 - 2008	No details of Consultation available
Bridgend Local Health Board Primary Care Estates Strategy	<p>Summarises the Bridgend Local Health Board's (the LHB) strategic proposals for the redevelopment of the estate from which primary care services are provided to the 146,000 people who currently use them. It outlines changes to the make up of the estate based on the evolution of a new model of service over the next decade.</p> <p>To develop this strategy the LHB has to answer three key questions:</p> <ul style="list-style-type: none"> • Where are we now? This describes and quantifies the baseline from which change will take place. The baseline outlines the main geographic and demographic characteristics of the area that the LHB serves, identifies and assesses the performance of the main premises that comprise the current estate and describes and assesses the model used to organise the delivery of current day services. • Where do we want to be? This has enabled the LHB and its partners to develop a vision for future service delivery and premises quality that outlines where it wants to improve on the situation described in its planning baseline and 	2004 - 2014	A series of multi-discipline / multi-agency workshops were held with wide representation from the LHB, General Practitioners, stakeholders, the local authority, the local NHS Trust. Patient, public and voluntary sector interests were represented by the Community Health Council.

Plan or Strategy	Critical themes	Plan period	Consultation methods used or proposed
	<p>how it wants these improvements to benefit patients, the general public and staff and independent contractors providing services.</p> <ul style="list-style-type: none"> • How do we get there? This has led the LHB, its partners and a wide range of stakeholders to consider different options for organising the delivery of services in the future and to choose a preferred option based on its expected performance in terms of delivering non-financial benefits, providing value for money and minimising risk. Answering this question has enabled them to develop the concept of a new model of service into costed proposals for new premises that are more suited to that model. 		
Communities First Action Plans	<p>As part of the community development process many of the Communities First partnerships will be developing Action Plans which will outline the community's aspirations for their area.</p> <p>As of October 2006 none of the partnerships had completed an action plan however they have begun identifying their needs and issues which will be addressed by the Plans, many of which may have a spatial element and so are relevant to the LDP process.</p>	Unknown	Various

21. Delete definition of 'Soundness' in Appendix 7: Glossary of Terms and replace with:

"The concept against which an LDP is examined by the Inspector at Independent Examination, irrespective of whether or not representations have been received, under the general headings of procedure, consistency & coherence and effectiveness, as prescribed under section 65(5)b of the 2004 Act. A Framework for assessing the soundness of the LDPs has been developed by the Planning Inspectorate".

1.4 Actions and Undertakings from the Council

1.4.1 The following actions and undertakings are required from the Council which do not necessitate a change to the Delivery Agreement. Nevertheless, their implementation will enable more effective consultation to take place with respect to preparation of the LDP:

1. To undertake future consultation periods on LDP documents for at least 6 weeks. Avoid consulting in August and over the Christmas period but where this is not possible the consultation will be extended, as appropriate.
2. To agree Terms of Reference of the LDP Key Stakeholder Forum at its next meeting.
3. In the interests of effective consultation, the Council will undertake to hold LDP Key Stakeholder Forum meetings in either the week before public consultation begins or, at the latest, in the 1st week of the consultation period.

4. To update the consultation database regarding license holders under the Electricity Act 1989, Gas Act 1986 and Communications Act 2003 as required by LDP Regulation 3.
5. To update the consultation database with regard to community / voluntary groups in liaison with BAVO to obtain contact details.
6. To update the consultation database with regard to community / voluntary groups in the Ogmore Valley by using the *Ogmore Valley Community Directory* to obtain contact details.
7. To update the consultation database regarding tenants and residents groups in liaison with Housing Associations operating in the County Borough.

1.5 The Actions Which Are Now Requested of the Council

- 1.5.1 In order to proceed with LDP preparations and with a view to formal submission of the final Delivery Agreement to the Welsh Assembly Government, Council is requested to agree the proposed changes to the draft Delivery Agreement set out in section 1.3 and Appendices 1 to 2 of this report and endorse the Actions and Undertakings from the Council in section 1.4.
- 1.5.2 Council is also requested to approve the Delivery Agreement (as amended) for formal submission to the Welsh Assembly Government.
- 1.5.3 Authority is also requested for the Assistant Director (Planning Services) to advise the Welsh Assembly Government on how the submitted Delivery Agreement meets the Assembly's assessment criteria as required by paragraph 4.6.1 of the *LDP Manual*.

1.6 Recommendations

- 1.6.1 That the Council agrees the changes to the draft Delivery Agreement of the Bridgend Local Development Plan (LDP) as outlined in 1.3 above.
- 1.6.2 That the Council agrees the Actions and Undertakings as outlined in 1.4 above.
- 1.6.3 That the Council recommends approval of the Delivery Agreement (as amended) for the purposes of formal submission to the Welsh Assembly Government.
- 1.6.4 That the Assistant Director (Planning Services) be authorised to advise the Welsh Assembly Government on how the Delivery Agreement meets the Assembly's assessment criteria.

Background Papers : General File 31A158A

Author : Mrs Susan Jones, Tel. 3169

RHODRI-GWYNN JONES
EXECUTIVE DIRECTOR – ENVIRONMENT
29 SEPTEMBER 2006

Bridgend Local Development Plan

REPRESENTATIONS by Representor

c/o Greenfields Land Reclamation Wales Ltd

V S & D S

Hughes & Owen

5 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Merthyr Mawr Community Council

Mrs Anne

McAllister

46 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Don't know			
Q8	No	The Council considers that the local organisation - Island Farm Action Group (IFAG) should have been included in this list.	Agreed.	The Council will include the Island Farm Action Group (IFAG) in Appendix 4 under General Consultation Bodies.
Q9	Yes	Given that the risk assessment on timetabling is set out in the document, the Council has concerns about implementation.	The Council considers that the proposed timetable is realistic, robust and achievable. Notwithstanding this, the Council has followed Welsh Assembly Government guidance contained in the Local Development Plan Manual (2006) and included a section on Risk Analysis which identifies risks to the timetable and sets out how they will be managed if they occur.	No action required.

Bridgend Local Development Plan

Vale of Glamorgan Council

REPRESENTATIONS by Representor

Mr D R

Thomas

57 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Don't know	Provided you have sufficient staff and financial resources.	The Council considers that the staffing and financial resources identified in the draft Delivery Agreement are sufficient to manage the LDP process. However, the Council will continually monitor resources to ensure the timetable remains realistic, robust & achievable.	No action required.
Q3	Yes	Although more detail could be provided about who sits on what groups (by role not name). You could add a section on expectations of stakeholders.	Agreed. To ensure transparency in the process, the Council undertakes to issue Terms of Reference for the LDP Key Stakeholder Forum at the next meeting, and to further clarify the rationale for membership and roles of the Forum and the LDP Steering Group in the Delivery Agreement.	The Council will issue terms of reference for the Key Stakeholder Forum. The Council will include a paragraph in the Delivery Agreement to clarify the rationale for membership and roles of the Forum and LDP Steering Group.
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Don't know	There may be licensees under the Gas / Electricity Acts who own apparatus in your area other than Transco and Western Power (e.g. in the Vale we also have BP International, Centrica Plc, RWE Npower, Wales & West Utilities, Accord Energy etc). You may need to add the mobile phone operators as well as Mono Consultants - alone they may not satisfy the regulations.	Agreed.	The Council will review the Specific Consultation Bodies in accordance with Annex A of LDP Wales (2005) and include them on the Statutory Consultee & Interested Party Database..
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

**Neath Port Talbot County Borough
Council**

Mr G A I

Jenkins

59 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

Environment Agency Wales

REPRESENTATIONS by Representor

Mr Phil

Coombe

61 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	No	<p>Table 2 of this document provides a risk analysis for the LDP preparation. Whilst this identifies resource availability within the local authority, no recognition is given to potential slippage resulting from consultees. We acknowledge that timescales will be set for consultation responses and would therefore request these be realistic particularly where statutory consultees are likely to be commenting on numerous LDP proposals throughout Wales - possibly within similar date parameters.</p> <p>A particular concern is Stage 4, when the LDP is placed on deposit. The timescale is shown to start in October 2008 and finish in December 2008. Unless the consultation process is envisaged to commence in early October, the consultation period could be directly impacted as a result of the December bank holiday period.</p>	<p>Whilst the Council recognises the need to be flexible and generous with regard to periods of consultation, it also believes that partner organisations may need to change their own internal working practices in order to meet the requirements of consultation and the Delivery Agreement.</p> <p>However, the Council will undertake to hold consultation periods on future LDP documents for a least 6 weeks and will avoid August and Christmas. Where this is not possible the consultation period will be extended as appropriate.</p> <p>Furthermore as the Environment Agency is a member of the LDP Key Stakeholder Forum the Council is also undertaking to hold meetings in either the week before public consultation begins or at the latest in the first week of the consultation period.</p>	The Council will review the Timetable in the Delivery Agreement and amend where appropriate.
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	Yes	We note the content of paragraph 2.6.3, relating to the production of SPGs and welcome the opportunity to provide an input to the identification and programme for such documents.	The Council, in consultation with key stakeholders, will produce a draft SPG programme which will be based on key priorities which are crucial to the implementation of the LDP. The programme will identify what SPGs will be produced and when.	No action required

Bridgend Local Development Plan

REPRESENTATIONS by Representor

The Glamorgan Gwent Archaeological Trust Ltd

Mr Neil

Maylan

63 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	No	Due to resourcing issues Cadw have, elsewhere, not been able to participate as a full member of the Stakeholders Forum. In these cases they have suggested that we take their place. It is suggested that Cadw are specifically consulted in regard to their current position in this matter. GGAT are able act as a substitute if required.	The Council considers that it is for Cadw to decide if they can attend the Forum. However, if they are unable to attend, the Council will accept a nominated representative to act on their behalf.	No action required.
Q8	Yes			
Q9	Yes	You are setting a tight timetable for the delivery of the LDP. However, given that the UDP is in place our experience with other UAs going through this process suggest that this timetable is achievable so long as progress is correctly monitored.	Four years is the time period for Plan Production set out in Local Development Plans Wales (2005). It is considered realistic that the Plan can be produced within four years. However, Chapter 3 of the draft Delivery Agreement does acknowledge and identify risks to the timetable and sets out how they will be managed if they occur.	No action required.

Bridgend Local Development Plan

Welsh Assembly Government

REPRESENTATIONS by Representor

Ms Lesley

Punter

64 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
		2. Timetable - Appendix 1 - Stage 6 gives the examination start as October 2009; PINS advised November 2009.	Agreed.	The Council will amend the Timetable detailed in Appendix 1 Stage 6 to November 2009 as per PINS advice.
		3. Add information on site register / candidate sites / site selection criteria in body of DA and at Appendix 1, Stage 3.	Agreed.	The Council will amend Table 1, Stage 3 and Appendix 1 Stage 3 to accommodate a new sub-stage for the identification of candidate sites, production of site register with reference to the Council providing criteria for site selection.
		4. Appendix 1 - Stage 3 - Reference to pre-deposit plan suggests that a full draft plan will be prepared and consulted upon - this is not in accordance with the LDP Regulations or LDP Wales paragraph 4.19 - the requirement is to prepare and consult on pre-deposit proposals document.	Agreed.	The Council will amend Appendix 1 accordingly..
		5. Petitions - it is recommended that the CIS clarify how these would be dealt with.	Agreed.	The Council will add a new paragraph to the Delivery Agreement to include details on how "Petitions" will be dealt with.
		6. Glossary - 'Soundness' - definition should be amended as it gives impression that prime purpose of examination is to consider representations. The Inspector will consider the plan in relation to 'soundness', not just representations. (LDPW para. 4.34)	Agreed.	The Council will amend the definition of "Soundness" contained in the Glossary.
		1. Dates of the formal statutory consultation periods could be clarified in Table 1 and in Appendix 2.	Agreed.	The Council will amend Table 1 and Appendix 1 column 3 to clarify the formal statutory consultation periods.

Bridgend Local Development Plan

Bridgend Local Health Board

Mrs Zoe

REPRESENTATIONS by Representor

Wallace

66 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
		LDP Appendix 4 'General Consultation bodies' - should include Bridgend Community Health Council in the list and move Bro Morgannwg NHS Trust from the 'other consultees' list to the 'general consultation bodies' list.	Agreed	The Council will include Bridgend Community Health Council and Bro Morgannwg NHS Trust to General Consultation Bodies in Appendix 4
		I would seek advice from Tejay de Krester or Heidi Bennett at BAVO with regard to the inclusion of specific vol orgs in the 'general consultation bodies list as there is potential to offend orgs if you leave them off the list. BAVO have over 500 vol orgs registered with them.	Agreed	The Council will contact BAVO for a list of voluntary groups / organisations it represents and ask if they wish to be included on the consultation database.
		Other key strategies that have been overlooked include the Bridgend Community Safety Strategy 2005-08 (contact john Davies, CSP coordinator) and the Children and Young Peoples Framework Partnership Plan (Contact Les Jones).	Agreed	The Council will include Bridgend Community Safety Strategy and Children and Young Peoples Framework Partnership Plan in Appendix 5
		LHB Primary Care Estates Strategy - to be referenced as a key document in section 4 of the SA document and to be considered in the LDP, with inclusion as a key document in Appendix 5.	Agreed	The Council will include LHB Primary Care Estates Strategy in Appendix 5

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Welsh Water / Dwr Cymru

Mr Rhidian

Clement

72 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Councillor M

Quick

112 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q4	Yes			
Q6	Yes	Suggest consultation within Ogmores Valley could be gained through "The Ogmores Valley Community Directory"	Agreed	The Council will contact the Groups / Organisations in the "The Ogmores Community Directory" to see if they want to be included in consultation database.
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Councillor A E

Davies

119 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	No	<p>Responses by September 06 not reasonable some organisations will not have met by September 8th. Consultation for 5 weeks over "Summer recess" not best play!</p> <p>Concern as to whether target date of Dec 06 is achievable re: submission of document; taking into account possible responses to consultation process, document may not be ready. At least very tight.</p>	<p>It is regrettable that the consultation period for the draft Delivery Agreement fell over the summer recess. However, the Council will undertake to hold consultation periods on future LDP documents for a least 6 weeks and will avoid August and Christmas. Where this is not possible the consultation period will be extended as appropriate.</p>	<p>The Council will review the Timetable in the Delivery Agreement and amend where appropriate.</p>
Q3	Yes			
Q4	Yes	<p>Need to: Increase level of information out to the public - press, radio etc. Information (general) regarding LDP and Meetings, out to Town & Community Councils; could be used in local newsletters, local town guides etc. Local exhibitions, workshops etc would help to relate local issues to borough wide issues.</p>	<p>As stated in the Delivery Agreement, a range of methods to facilitate community involvement will be used throughout the plan preparation process, which will be designed to ensure efficient and effective consultation and participation.</p>	<p>The Council will note suggested community involvement methods.</p>
Q5	Yes	See Q4 above.		
Q6	Yes			
Q7	Yes			
Q8	Yes	<p>Review needed and ongoing monitoring to keep up to date. Will there be named reps rather than just organisation names?</p>	<p>The Council will try to ensure that the LDP consultation database is kept up to date. However, with over 600 consultee contact details already in the database, it will be for the individuals and organisations to keep the Council updated should any of these details change in the future.</p>	<p>No action required</p>
Q9				

Bridgend Local Development Plan

British Geological Survey

Dr Adrian

REPRESENTATIONS by Representor

Humpage

157 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Don't know			
Q6	Yes			
Q7	Don't know			
Q8	Don't know			
Q9	No			

Bridgend Local Development Plan

Design Commission for Wales

REPRESENTATIONS by Representor

Cindy

Harris

166 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bro Morgannwg NHS Trust

170 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	No	Probably not: Most Development Plans take longer to prepare than anticipated. The risk analysis is helpful in identifying potential causes of delay	Four years is the time period for Plan Production set out in Local Development Plans Wales (2005). It is considered realistic that the Plan can be produced within four years. However as noted, Chapter 3 of the draft Delivery Agreement does acknowledge and identify risks to the timetable and sets out how they will be managed if they occur.	No action required.
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes	We note that the Bridgend LHB is a member of the Forum.		No action required.
Q8	Don't know			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr V S

Hughes

179 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr P D

Kinsella

183 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr Gareth

Ames

184 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

Porthcawl Civic Trust Society

REPRESENTATIONS by Representor

Mr Mike

Mansley

192 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Don't know	As the progress of the preparation is dependent upon resources outside the control of the Society it is impossible for us to comment on whether the timetable is realistic or deliverable.	The Council considers that the staffing and financial resources identified in the draft Delivery Agreement are sufficient to manage the LDP process. However, the Council will continually monitor resources to ensure the timetable remains realistic, robust and achievable.	No action required.
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr & Mrs R J

Hayes

193 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

British Horse Society

Mr G.J

Wheeler

212 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	No	<p>The Campaign for the Protection of Rural Wales is not represented by any of the Partnerships in the current list. And should therefore be included. Contact Details: Mr Gordon J Wheeler, Baytree, 29 Newton Nottage Road, Porthcawl, Mid Glamorgan, CF36 5PF</p>	<p>The Council considers that countryside issues are adequately represented through the Countryside Council for Wales, the Bridgend Biodiversity Partnership and the Bridgend Environmental Partnership. Therefore CPRW should not be included in the LDP Key Stakeholder Forum, however this does not preclude them making direct representations to the Council.</p> <p>Given the above, it is appropriate for CPRW to be included in the list of general consultation bodies detailed in Appendix 4 of the Delivery Agreement.</p>	<p>The Council will include The Campaign for the Protection of Rural Wales (CPRW) in Appendix 4 of the Delivery Agreement under General Consultation Bodies.</p>
Q8	No	<p>As the title of the appendix suggests there should be two not four lists. On the one hand "Statutory Consultees" and on the other simply "Other Consultees". The present arrangement is unclear, divisive and does not lead to feelings of inclusiveness</p>	<p>The Council has followed the guidance contained in Local Development Plans Wales (2005) regarding the structure of the Statutory Consultee and Interested Party Database.</p> <p>In practical terms there is no differentiation in the level or type of consultation or status conferred by inclusion in either the General Consultation Bodies or Other Consultees lists.</p>	<p>No action required.</p>
Q9	Don't know			

Bridgend Local Development Plan

Porthcawl 4M Group

REPRESENTATIONS by Representor

Mrs P R

Chapman

277 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

RSPB Cymru

Mr Mike

Webb

293 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
		Options: It is unclear how the LPA will approach the issue of alternative options. It is not clear whether the public will be consulted on alternative options.	<p>The Council considers that Appendix 1 clearly explains how the Council will deal with the issue of alternative options.</p> <p>It is intended that a formal consultation will take place at the Preferred Strategy and Spatial Implications sub-stage which will include consultation with the general public. At this stage there will be an opportunity to propose changes to the preferred strategy.</p>	No action required.
		Pre-Deposit Consultation Stage: The RSPB welcomes the commitment on the part of the local planning authority to produce a Pre-Deposit Consultation draft of the plan. However, the DA/CIS should make it clear that this version of the plan will be produced at a level of detail such that those who have a legitimate interest in the plan can gain a full appreciation of the impact of the plan on that interest. There should thus be a proposals map at this stage, which should cover the entire local authority area. This would have the further positive effect of ensuring that the potential for negotiated solutions is maximised, because in the absence of this, the first indication which communities will have of the implications for the plan on their communities will be in the deposit version of the plan, at which point the plan moves into a confrontation and quasi-judicial stage.	<p>The Council considers it is too early in the plan preparation process to decide the appropriate level of detail contained in the Pre-Deposit Proposals Documents.</p> <p>It should be noted that the LDP Manual states that the Pre-Deposit Proposals Documents do not need to include a full draft of the LDP. However, it is acknowledged that too little detail will result in Stakeholders lacking vital information, impairing the usefulness of the exercise, however too much detail could divert respondents from considering the strategic issues.</p>	No action required.
		The RSPB welcomes the prominence given to community involvement in the Pre-Deposit stage, for example at para 4.2.1. (ii). However, this should not come at the expense of those who wish to object (and maintain that objection) to the plan	Agreed. All Consultees and Stakeholders will have the opportunity to make and maintain representations to the plan.	No action required.

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Strategic Environmental Assessment: The document does not state how the SEA will impact on plan content. A paragraph should be inserted into the document stating that :-

It is a requirement of the Directive that the local planning authority :-

"takes into account the environmental report (i.e. the conclusions of the SEA)in decision-making"

"..shows how the results of the assessment have been taken into account", and

"gives the reasons for choosing the plan as adopted in the light of other reasonable alternatives"

("Implementing the SEA Directive" Welsh Assembly Government, 2004)

It is the view of the RSPB that this means that it is expected that the most environmentally-acceptable option will be pursued unless other material issues clearly outweigh the need to do this. The onus is on the local planning authority plan formulators to show that this is the case, not the SEA, as the purpose of the latter is to show the environmental implications of the plan. It is therefore important that there is "distance" between the SEA and the LDP

The Council considers that Section 2.7 of the Delivery Agreement adequately illustrates that the Council must comply with the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regulations) which implements the European Union Directive 2001/42/EC on the assessment of the effects of certain plans and programmes on the environment (commonly known as the Strategic Environmental Assessment (or SEA) Directive).

Throughout the process of the LDP preparation, successive stages will be subject to SA. This is in order to ensure that where decisions have to be made on the selection of alternative approaches to development in the Plan area, setting objectives, creating policies and allocating proposals, these are based on a good understanding of the implications for sustainability.

No action required.

Supplementary Planning Guidance:

Para 1.22: This para should include a statement that SPG is a material consideration in both development plan formulation, and development control.

Partly Agree. The Council considers that SPGs can only be regarded as a material consideration with respect to the determination of planning applications. In terms of their role in the context of the LDP, they are a means of setting out detailed guidance on the way policies will be applied. It is a matter for consideration in the plan preparation process to decide what SPG to produce and how to modify existing SPGs in the context of emerging or changing priorities and strategies.

The Council will amend paragraph 2.6.1 of the Delivery Agreement accordingly.

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Appendices:

Appendix 1:

Stage 1 : The evidence base for the LDP and for the SEA should be expressed spatially. The reason for this is that it will enable plan-formulators and those producing the SEA to gain a full appreciation of the interactions (both negative and positive) between the environmental resources of Bridgend and the spatial strategy options. Good practice recommends that the following datasets (all of which are readily available in digital form) should be used :-

1. The Wales State of the Environment Report (CCW/Environment Agency Wales).
2. Spatial data on priority habitats pursuant to the UK BAP are now available in digital form from the Countryside Council for Wales.
3. The RSPB holds spatial data on the distribution of priority bird species in Bridgend. These can be made available to the local authority on request.
4. Countryside Council for Wales's (CCW) Phase 1 data. Although somewhat out of date in places, this data source can also be expressed spatially and is a valuable tool. It is obtainable from CCW and covers Bridgend.
5. Statutorily designated sites for nature conservation. These are obtainable from CCW.
6. Locally designated sites of importance for Nature Conservation (Wildlife Sites).

General and Specific Consultations Bodies should be involved at this stage, because they will hold much useful data for generating the Environmental Baseline (Column 4)

The Council will develop systems for storing and analysing information which can be presented in an accessible way as advised in the LDP Manual.

The Council is aware of the datasets detailed and will utilise where appropriate.

The Council acknowledges that General and Specific Consultation bodies may have existing information and datasets that will assist the Council's data gathering exercise and would welcome this information if they wish to submit it. However the LDP Manual does not recommend that "an extensive and time consuming Survey - Analysis, stage is required before LDP production can commence".

No action required.

Bridgend Local Development Plan

REPRESENTATIONS by Representor

	<p>Stage 3: General and Specific Consultation Bodies should be involved at this stage, because they should be involved in generating the Vision and Strategic Options (Column 4). The public and community/campaign groups should also be involved in this stage, because many will have views on these matters. In the absence of this, these stakeholders would essentially be presented with a fait accompli in terms of the Vision and Options.</p>	<p>General and Specific consultation bodies will have the opportunity to comment on the Preferred Strategy Proposals Documents when they are placed on Deposit. The Documents will set out the authority's vision and overall objectives, the strategic spatial options considered, and its preferred spatial strategy. It will also cover the implications for development of pursuing this strategy, including any major sites on which the strategy depends. The LDP Key Stakeholder Forum, which represents community groups and various interests will already have had involvement in the Visioning and Strategic Options.</p> <p>The Council considers that the formal consultation stage provides an opportunity for communities and stakeholders (including the general public) to influence the preferred strategy and suggest modifications or alternatives.</p>	<p>No action required</p>
	<p>The Expression of the Spatial Implications of the Preferred Strategy: (Column 1): This must be carried out at the appropriate scale. The Denbighshire SEA Draft Scoping Document for example states, in a table relating to Pre-Deposit Consultation that :-</p> <p>"the effects of detailed LDP policies and proposals" will be assessed.</p> <p>The RSPB is strongly of the view that a similar commitment should be made by the local planning authority.</p>	<p>The Council considers it is too early in the plan preparation process to decide the appropriate level of detail contained in the Pre-Deposit Proposals Documents. It is acknowledged that too little detail will result in Stakeholders lacking vital information, impairing the usefulness of the exercise, however too much detail could divert respondents from considering the strategic issues.</p>	<p>No action required.</p>
	<p>Availability of LPA Assessment of Representations: Column 5 implies that not all assessment of representations will be made available on the web-site. The RSPB is of the view that all responses to representations should be made available.</p>	<p>The LDP Manual (2006) states (para 6.6.1 refers) that a general description of comments received and how they have affected the policies and proposals should be fed back to respondents and included in the Initial Consultation Report. The Initial Consultation Report does not need to provide a schedule of individual comments, but must include a general summary of comments and the Council's responses.</p> <p>As stated in the Delivery Agreement, the Initial Consultation Report will be published on the Council web-site.</p>	<p>No action required.</p>
	<p>Stage 4: It is not clear that the SE/SA Environmental Report will be consulted upon, Column 5 stating that "Copies of the Pre-Deposit Draft of the Plan and associated documents" (emphasis added) will be consulted upon. We recommend that this column is amended to clarify that the Environmental Report (ER) will be consulted upon. It is important that the SEA is subject to consultation. A deficient SEA could underpin an environmental damaging LDP, therefore it is important that the former is subject to scrutiny. The same issue applies at the "New or Alternative Site" Stage.</p>	<p>As stated in column 1 of stage 4, the SA/SEA report is included as part of the Deposit LDP associated documents. They will be placed on deposit to enable all stakeholders to make representations.</p>	<p>No action required.</p>

Bridgend Local Development Plan

REPRESENTATIONS by Representor

	<p>Independent Examination: Insert "Stakeholders" and "the Public" in Column 4. Under the new arrangements, as set out in the "A Framework for Assessing the Soundness of LDP's " (PINS 2005), the Inspector can call those who did not make representations to appear at the Examination.</p>	<p>Agreed. The Council acknowledges that the Inspector will be assessing the soundness of the plan as a whole and will be able to invite participants to give evidence on particular issues, including those who have not made representations.</p> <p>Therefore the Council will include Other Consultees and Stakeholders (including General Public) in column 4 of the Independent Examination .</p>	<p>The Council will amend Appendix 1 of the Delivery Agreement accordingly.</p>
	<p>Appendix 4: There are no environmental non-governmental organisations in the list of General Consultation Bodies</p> <p>The list of other consultees does not include any residents' group set up to oppose specific development proposals</p>	<p>The Council is continually developing the Statutory Consultee & Interested Party Database, however any suggestions for further representation will be welcome.</p>	<p>No action required.</p>
	<p>Consultation over Vision and Strategy: The RSPB is of the view that the public should be involved in generating the vision and alternative strategies. The document implies that the public will be relegated to the purely passive role of commenting on the preferred strategy, this having been decided upon beforehand by the local planning authority, and those bodies which "the local planning authority (emphasis added) thinks appropriate" (Regulation 14 (b) LDP Regulations 2005). Please see detailed comment on the appendices in relation to this matter</p>	<p>The Council considers that the public will have the opportunity to comment on the Preferred Strategy when the Pre-Deposit Proposals Documents are placed on Deposit. The Documents will set out the authority's vision and overall objectives, the strategic spatial options considered, and its preferred spatial strategy. It will also cover the implications for development of pursuing this strategy, including any major sites on which the strategy depends.</p> <p>The LDP Key Stakeholder Forum, which represents community groups and various interests will already have had involvement in the Visioning and Strategic Options.</p> <p>The Council considers that the formal consultation stage provides an opportunity for communities and stakeholders (including the general public) to influence the preferred strategy and suggest modifications or alternatives.</p>	<p>No action required.</p>

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bridgend Housing Partnership

Mr Peter

Green

583 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes	But perhaps the explanation on the key stages in the glossary of terms would also benefit from being in Section 3.	The Council considers the purpose of the Key Stages are clearly defined in Appendix 1 and expanded upon where appropriate in the Glossary of the Delivery Agreement	No Action Required.
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes	But need to use existing networks fully, especially in communities first areas but also, for example, tenant's and resident's associations facilitated by the 4 housing associations identified under "other consultees" in Appendix 4.	As stated in the Delivery Agreement, a range of methods to facilitate community involvement will be used throughout the plan preparation process, which will be designed to ensure efficient and effective consultation and participation.	The Council notes the suggested community involvement methods. The Council will contact the Housing Associations active in Bridgend to obtain contact details of tenant resident associations they facilitate and ask if they wish to be included on the consultation database.
Q6	Yes	But what is the process for the "review and develop evidence base". For example, using information from local housing market assessment. Furthermore is there a planned co-ordination to ensure evidence capture is commissioned at an appropriate time to coincide with LDP requirement? For example, local housing market assessment - Budget required in 2007-2008 to enable the assessment.	The Planning Department is working with other departments within the Council to coordinate the requirement for the review and development of the evidence base for LDP preparation.	No change required.
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bridgend Town Centre Forum

Mr Jonathan

Hughes

584 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	No	<p>1. Given the nature of the organisations involved e.g. Town and Community Councils, Partnerships Boards etc, timings of their meetings may not be synchronised with consultation requirements.</p> <p>2. Consultation exercises often establish 12 week periods though it is acknowledged that this may not be feasible for the LDP process.</p> <p>3. Pre-briefing of LDP Stakeholder Forum in respect of forthcoming consultations might assist in being able to adhere to consultation timescales in addition to pre-programming and diarising a schedule of Forum meetings so as to establish dates and the degree of commitment required.</p> <p>4. Consideration of a variety of media for consultation.</p> <p>5. As LDP is out of sync with other 'key strategies', it is important that the LDP process captures the review stages of these other strategies.</p>	<p>Whilst the Council recognises the need to be flexible and generous with regard to periods of consultation, it also believes that partner organisations may need to change their own internal working practices in order to meet the requirements of consultation and the Delivery Agreement.</p> <p>The Council does not consider a 12 week consultation period is feasible given the 4 year preparation timetable. However, the Council will undertake to hold consultation periods on future LDP documents for a least 6 weeks and will avoid August and Christmas. Where this is not possible the consultation period will be extended as appropriate.</p> <p>It is acknowledged by the Council that timely briefings of the Forum will lead to better consultation responses. In this respect the Council will undertake to hold LDP Stakeholder Forum Meetings either a week before public consultation begins or at the latest in the first week of consultation.</p> <p>As stated in the Delivery Agreement, consideration of a range of methods to facilitate community involvement will be used throughout the plan preparation process, which will be designed to ensure efficient and effective consultation and participation.</p> <p>The Council will endeavour to co-ordinate the LDP production process to take account of the review stages of the other "Key Strategies". However, the LDP preparation process can not be put on hold pending publication of the reviews.</p>	No action required.

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Q3	No	<p>1. Local Area Groups would assist the process development in the BCB-wide forum.</p> <p>2. Documentation needs to be accessible and usable and to this effect the engagement of younger and older age groups is important e.g. Youth Council, SHOUT.</p> <p>3. Local BCB-wide discussion must be supplemented by mechanisms for neighbouring authority participation.</p> <p>4. Encouragement of an inclusive approach so as not to preclude representation by individuals and groups not identified within the Forum.</p> <p>5. Process must reflect the needs of the community e.g. hours of consultation say with the business community should recognise business hours and needs - hence the need for flexibility of approach.</p> <p>6. The process must seek to reflect and integrate the area-based regeneration programmes that are underway or emerging across the County Borough.</p>	<p>As stated above, a range of methods to facilitate community involvement will be used throughout the plan preparation process, which will be designed to ensure efficient and effective consultation and participation.</p>	No action required.
Q4	No	<p>1. The principles are generally fair and appropriate.</p> <p>2. It is important that 'hard to reach' groups are addressed.</p> <p>3. It must be acknowledged that some groups simply do not wish to engage with the process.</p> <p>3. Definition of communications strategy that makes for accessible documentation that will encourage engagement and participation.</p> <p>4. Development of appropriate consultation media should balance the need to summarise information but without diluting the message that needs to be transmitted.</p>	<p>Noted.</p> <p>The Council acknowledges that they will need to encourage, support and empower disadvantaged and hard to reach groups and individuals to allow them to participate fully in the LDP process. However it is acknowledged that some groups may not wish to participate in the process.</p> <p>The Council will employ a range of methods to facilitate community involvement appropriate to the target consultation group.</p>	No action required.
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Q9	Yes	<p>1. The principles of the CIS should remain general and not become prescriptive such as to become inflexible and unable to adapt to changing circumstances.</p> <p>2. It is most important that 'hard to reach' groups are connected to the process which might necessitate the use of innovative or more informal methods of communication.</p> <p>3. It is important that representation is inclusive and that the process and documentation does not become dominated by particular consultees, individuals or interest groups to the detriment of the overarching strategy development and subsequent implementation.</p>	<p>Agreed.</p> <p>See response to Question 3.</p> <p>Agreed.</p>	<p>No change required.</p>
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Bridgend Local Development Plan

REPRESENTATIONS by Representor

Planning Inspectorate Wales

Miss Vicky

Brown

591 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1		<p>The Planning Inspectorate has the following comments: -</p> <p>The proposed timetable for examination allows for 12 months from submission to publication of the Inspector's report. The Inspectorate wishes to clarify the draft model programme for an LDP Examination:</p> <ul style="list-style-type: none">i) 6 weeks from submission of the LDP to Pre-Examination Meeting (PEM).ii) 12 weeks from PEM to Examination.iii) 12 weeks (maximum) for Examination. The average length of an LDP Examination is expected to be 6-8 weeks depending on the LDP in question.iv) 22 weeks for reporting. <p>The indicative timetable suggests that Plan submission would be in July 2009; following the draft model programme for Examination, the timetable would be as follows:</p> <ul style="list-style-type: none">i) July 2009 - Submission of the LDP and key documents to WAGii) August 2009 (mid) - Hold PEM.iii) November 2009 (early) - Examinationiv) February 2010 (early) - Reporting period begins.v) July 2010 (mid) - Inspector's Report is submitted. <p>Following the submission of the Report there will be a period in which a factual check by the authority will be completed (the check will be for typographical errors and the like); we estimate that the period for this check will be: a) 10 days for the authority to comment; and b) 10 days for the Inspector to make any changes.</p> <p>We would recommend that the authority contact the Inspectorate to discuss any queries regarding the LDP timetable, and continue to liaise with us in order to minimise potential programme slippages where the Independent Examination is concerned.</p> <p>The Inspectorate does not have any further comments to add at present.</p>	<p>Agree. The Council will amend the timetable in respect of the advice provided by The Planning Inspectorate.</p> <p>The Council will continue to liaise with the Planning Inspectorate in order to reduce potential programme slippages in respect of the Examination stage of LDP preparation.</p>	<p>The Council will amend the Timetable detailed in Appendix 1 Stage 6 to November 2009.</p>

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bridgend Women's Aid

Ms Karen

Miller

595 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
		<p>Bridgend Women's Aid has had sight of the Local Development Plan Draft Delivery agreement and would request to be included as a consultee.</p> <p>Our office is in Bridgend but our services and client base cover the whole of the Bridgend County Borough.</p> <p>Our particular interest in responding to future consultation on the LDP is that we offer emergency refuge accommodation to individuals and families suffering from domestic abuse and then assist in securing more permanent accommodation for those who have passed crisis point and are ready to move on into their own new homes.</p> <p>Suitable accommodation is very limited and we are unable to help all who approach us due to lack of accommodation in the Borough. We also wish, in the future, to extend our client services by opening satellite offices in other parts of the Borough, especially in the valleys where we receive many requests for assistance.</p> <p>I hope you will review our request in light of the above information and include us in your amended list of consultees.</p>	Agreed	The Council will include Bridgend Women's Aid in Appendix 4 of the Delivery Agreement under General Consultation Bodies.

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Communities First Bridgend

612 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	No	Too technical, needs to be jargon free. There is a glossary included but this itself contains acronyms with no easy references. Future public consultation documents need to be user friendly. Stage 5. Public exhibitions are listed as a method of consultation. These need to be held locally and should cover as a minimum the 9 local forum areas and must not be held centrally in Bridgend	<p>The Delivery Agreement is a technical and procedural document and therefore by its very nature contains technical language that has no jargon free substitute. However with respect to Diagram 2, the abbreviations SA & SEA will be replaced with Sustainability Appraisal and Sustainable Environmental Appraisal.</p> <p>The Council considers that it needs to operate flexibly in its approach to public consultation and can not at this stage commit itself to a specific number and type of specific consultation methods.</p>	The Council will amend Diagram 2 of the Delivery Agreement accordingly.
Q2	No	Six weeks is unrealistic for public consultation. If this is the maximum time permitted then the methods of consulting the public must be well planned. The consultees needs must be taken into consideration, specifically the needs of the general public. This cannot be a "one size fits all" approach. We need to ensure a fair presentation between all sectors is fed into the process.	<p>The Council recognises the need to be flexible and generous with regard to periods of consultation, it also believes that partner organisations may need to change their own internal working practices in order to meet the requirements of consultation and the Delivery Agreement.</p> <p>However, the Council will undertake to hold consultation periods on future LDP documents for a least 6 weeks and will avoid August and Christmas. Where this is not possible the consultation period will be extended as appropriate.</p> <p>The Council acknowledges that there will be a need to establish measures and procedures that will enable every person or group, regardless of their background, to participate in the plan making process and ensure that the consultation process is inclusive. The Council considers the Delivery Agreement is flexible enough to accommodate this requirement.</p>	The Council will amend the timetable accordingly.
Q3	No	Fairly clear for professionals but would not be clear for community members we work with. The majority of the general public would be unfamiliar with terms used. Needs to be plain english and jargon free	The Delivery Agreement is a technical and procedural document and therefore by its very nature contains technical language that has no jargon free substitute. However one of the roles of the LDP Stakeholder Forum is to disseminate information to representatives of groups they represent, and this will be clarified in an undertaking by the Council to produce a "terms of reference" for the LDP Key Stakeholder Forum.	The Council will produce terms of reference for the LDP Key Stakeholder Forum.

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Q4	No	The community should have been involved in the process of drawing up the draft delivery agreement. Citizen's panel is not representative of our deprived communities	<p>The Council has placed the draft Delivery Agreement on a 5 week deposit period to allow for public comment. The Key Stakeholder Forum was also convened to discuss the Delivery Agreement, which included community groups and interested parties, to provide an opportunity for detailed discussion and comment.</p> <p>The Citizens Panel has been selected to be statistically representative of the whole of the County Borough. As such it is representative of all types of communities.</p>	No action required.
Q5	No	Targeted discussion/focus groups need to be local. Held in each community and easily accessible and not held centrally in Bridgend. Information provided should be user friendly and in a format people can easily understand.	See Question 1.	
Q6	No	Regeneration forums and Communities First Partnerships are included but not all areas are represented by either a forum or CF Partnership. All community groups across the borough should be given an equal opportunity	<p>Membership of the Forum consists of partnership and representative organisations as well as certain Specific Consultation Bodies. This ensures that the Forum is of a manageable and effective size. It is envisaged that Forum members will disseminate LDP information to the persons / organisations they represent to facilitate extended consultation using existing structures. If an organisation is not represented on the Forum, this does not preclude it from making direct representations to the Council."</p> <p>The Council is continually developing the Statutory Consultee & Interested Party Database. In this respect the Council will contact BAVO for a list of voluntary groups / organisations it represents and ask if they wish to be included on the Statutory Consultee & Interested Party Database.</p>	The Council will contact BAVO for a list of voluntary groups / organisations it represents and ask if they wish to be included on the consultation database.
Q7	No	See Q6	See Question 6.	See Question 6.
Q8	Yes			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Q9	Yes	Communities First Action Plans will be of relevance to the process. Local people may already have ideas for land use in their communities. Glossary needs simplifying. Public should have been part of the process of drawing up the draft delivery agreement. Timescale was inadequate it has been difficult to engage with community groups due to the summer holidays. The timing was also an issue for other groups and organisations e.g., town and community councils. Due consideration should be given to how we engage the community. Community group members are attending voluntarily and also have other commitments e.g., work and family. This also applies to community councillors etc . There is a need for a dedicated team to drive the process forward in partnership with the key stakeholders. The draft delivery agreement also made no reference to the Wales Spatial Plan. We wanted to answer yes to some of the questions but this prevented us from including comments.	Agreed. Communities First Action Plans will be included in Appendix 5 of the Delivery Agreement. The Council considers that the Glossary is clear and concise and has been based on guidance set out in LDP Wales (2005). Whilst the Council recognises the need to be flexible and generous with regard to periods of consultation, it also believes that partner organisations may need to change their own internal working practices in order to meet the requirements of consultation and the Delivery Agreement. However as stated in response to question 2, the Council will undertake to hold consultation periods on future LDP documents for a least 6 weeks and will avoid August and Christmas. Where this is not possible the consultation period will be extended as appropriate.	The Council will amend the Delivery Agreement accordingly. No action required. Amend Timetable accordingly.
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Mr Alec

McKenzie

616 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q6	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

H

Price

618 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
Q1	Yes			
Q2	Yes			
Q3	Yes			
Q4	Yes			
Q5	Yes			
Q5	Yes			
Q7	Yes			
Q8	Yes			
Q9	No			

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Island Farm Action Group (IFAG)

Mrs Anne

Morgan

624 A 1

Que No	Response	Comments/Additions/Alterations	Council's Response	Action
		1. The priority given to the objectives of Community Involvement (para 1.7) and the wide range of consultees (Appendix 4) is to be welcomed.	Support is welcomed	No action required.
		2. Does the use of the wording (2.6.1) “selective use of Supplementary Planning Guidance (SPG)” require further clarification? SPG guidance is fundamental to and consistently used in the determination of Planning Applications and this vague indication of a degree of “selectivity” in the LDP might not be clear and cause concern to clients users.	Agreed.	The Council will amend paragraph accordingly.
		3. IFAG commend the prioritisation again being adopted of “ sustainability” as a cornerstone of the new LDP (2.7.1)	Support is welcomed	No action required.
		5. You ask for comment on the timetabling for the LDP. Given the risk assessment included in the draft our view is that it will indeed be fortunate if there is no slippage beyond the three months allowed.	The Council considers that the proposed timetable is realistic, robust and achievable. However, the Council has followed Welsh Assembly Government guidance contained in the Local Development Plan Manual (2006) and included a section on Risk Analysis which identifies risks to the timetable and sets out how they will be managed if they occur.	No action required.
		6. It is not made clear exactly how the “Citizen's Panel” (4.5.1) will be used. We suggest clarification on this issue is included. To whom will they be a “control group” (4.5.1) and what and how will weight be given to their responses.	Agreed.	The Council will amend paragraph 4.5.1 of the Delivery Agreement to clarify that previous and future results from Citizen Panel surveys may be used to inform the evidence base of the LDP.
		7. Appendix 4 – Statutory Consultee & Interested Party Database Can IFAG suggest, given their involvement and their comments made during the progress of the UDP, that they should have been included on this list. We request that we are included on the “General Consultation Bodies” list.	Agreed	The Council will include the Island Farm Action Group (IFAG) in Appendix 4 of the Delivery Agreement under General Consultation Bodies.

Bridgend Local Development Plan

REPRESENTATIONS by Representor

4. Is the site at the Island Farm Planning Application location (Macob/WRU) included in the three sites mentioned at 2.7.5?

The European habitat directive will apply to this site in that there are two protected species, Dormice and Lesser Horseshoe bat. IFAG suggest that an "APPROPRIATE ASSESSMENT" is required for this site.

The site of planning Application P/03/58/OUT submitted by Island Farm Developments is not one of the three sites referred to in paragraph 2.7.5 of the draft Delivery Agreement.

In Bridgend the three sites that are designated at a European level for their importance for nature conservation under the Habitats Directive are the Special Areas of Conservation at Blackmill Woodlands, Cefn Cribwr Grasslands and Kenfig Burrows (and Merthyr Mawr Warren).

It is only a requirement of the Habitats Directive that plans and proposals that may have an impact on sites designated under this directive undergo an "appropriate assessment".

No action required.

Report of LDP Key Stakeholder Forum Draft Delivery Agreement

**15th August 2006
Bridgend Rugby Club, Tondur Road**

1. Introduction

The first meeting of the Bridgend Local Development Plan Key Stakeholder Forum was held on the 15th August 2006 in the President's Suite of Bridgend Rugby Club from 10am to 3pm. The purposes of the first meeting were to:

- Formally convene the LDP Key Stakeholder Forum
- Introduce the Key Stakeholder representatives to the LDP system
- To brief the Key Stakeholders on the draft Delivery Agreement and seek their views on its contents; and
- To brief the Key Stakeholders on the draft Sustainability Appraisal Scoping Report and seek their views on its contents.

The draft Delivery Agreement and Sustainability Appraisal Scoping Report were, at the time, on public consultation which ran from the 3rd August – 8th September 2006.

In total, 66 delegates attended the Forum meeting, representing 46 organisations (see Appendix A). These were divided into eight tables for the discussion sessions regarding the draft documents.

The purpose of this report is to highlight the issues which were raised at the meeting (in verbal discussions and from notes taken by table invigilators) and to recommend, where necessary, any amendments to the draft Delivery Agreement. This report should be read in conjunction with the Council's Response to Representations on the draft LDP Delivery Agreement report, which details individual comments made to the document; the Council's response; and any proposed actions and changes to the document.

This report does not deal with comments and discussion related to the draft Sustainability Appraisal Scoping Report which also occurred at the Forum meeting. These will be the subject of a separate report produced by Baker Associates.

2. Introduction to the LDP System in Bridgend County Borough

The Forum meeting began with a presentation from the Council regarding the LDP system and how it operates. A copy of the presentation can be found at Appendix B. Questions were invited on the contents of the presentation.

A question was asked how the current process differs from the future LDP and how the LDP and SPGs (Supplementary Planning Guidance) would be synchronised with the Wales Spatial Plan. The Council stated that it has discretion to devolve policy issues to SPG, but it, along with other authorities,

had been reluctant to do so in the past; however they were now positively encouraged to do so. It was asked if this would delay the LDP process. The Council responded that SPGs will not do this as they can be produced concurrently.

Discussion then ensued with regards to the Porthcawl SPG; with a reassurance from the Council that as time passes and circumstances change any changes to the SPG can still be afforded weight.

One delegate expressed concern that parts of the UDP would be 'cherry picked' from the LDP. The Council responded by stating that the LDP will have to take account of what the UDP says and test it through the LDP process but that Bridgend was in a fortunate position of having an adopted UDP to work from.

3. The Draft Delivery Agreement

The Forum continued with a presentation from the Council regarding the draft Delivery Agreement. A copy of the presentation can be found at Appendix C. Questions were invited on the contents of the presentation.

It was queried whether the Council have the staff and financial resources to carry out the LDP process. The Council responded that the staff resources are in place and, if needed, additional financial resources would be requested from the Executive Director – Environment.

It was also asked if there would be any penalties on the Council for not meeting Welsh Assembly Government targets. The Council explained that if the deadlines are not met the Assembly would require a valid reason and an amendment to the timetable would need to be agreed. The worse-case scenario is that the Assembly could take over the Development Plan process from the Council.

There followed discussion in groups which were structured by the facilitators to follow the same consultation questions used in the public representation form. The feedback from these discussions is summarised below. All Council Action points are summarised in Appendix D.

Q1. Does the timetable clearly define all of the main stages of the LDP preparation process?

The general view of the Forum was that the timetable did clearly define all the main stages of the LDP process.

Q2. Do you think the Timetable is realistic and deliverable?

There was a mixed response to this question. Those groups that expressed the view that the timetable was not realistic gave the following reasons:-

- The consultation periods are not long enough for internal reporting mechanisms within organisations.
- There should be a minimum consultation period of 2 months.
- Consultation periods should avoid the holiday periods of August and Christmas. A view which was informed by many representatives of Community Councils which have an annual recess during the month of August.
- The baseline information (as contained in the SEA Scoping Report) is inadequate requiring substantive new survey work which will be time consuming and expensive and will put pressure on the timetable.
- Community engagement with some 'hard to reach' groups will be time consuming
- A view was also expressed that it would be helpful to hold briefing sessions prior to the official public consultation periods and the Forum meetings so information could be fed back to organisations.

Council's response and actions proposed

- Whilst the Council recognises the need to be flexible and generous with regard to periods of consultation, it also believes that partner organisations may need to change their own internal working practices in order to meet the requirements of consultation and the Delivery Agreement. In addition, the overall plan preparation period is necessarily compressed by the Welsh Assembly Government requirement to adopt an LDP within 4 years. **The Council will undertake to hold consultation periods on future LDP documents for at least 6 weeks and will avoid August and Christmas. Where this is not possible the consultation period will be extended, as appropriate.** The Council has examined the timetable and considers the timescale to be flexible enough to accommodate this commitment.
- The Council considers that it has allocated enough time in the draft Timetable to undertake the work necessary to update baseline information and to undertake consultation with all relevant parties.
- It is acknowledged by the Council that timely briefing of the Forum will lead to better consultation responses. Whilst meetings before the official public consultation period starts may be impractical. **The Council will undertake to hold LDP Stakeholder Forum meetings either in the week before public consultation begins or at the latest in the first week of consultation.**

Q3. Did you find the information in subsection 3.4 on how the Council intends to manage the process clear and easy to understand?

The general answer to this question was Yes. Although a strong theme coming across was that the process contained too much jargon. SA and SEA should be expressed as 'Sustainability Appraisal' and 'Strategic Environmental Assessment' respectively.

In the interests of transparency it was also suggested that the public should know who sits on the LDP Steering Group. It was also queried whether the LDP Stakeholder Group had a terms of reference.

Council's response and actions proposed

- The Council acknowledges that the Delivery Agreement may appear inaccessible to certain groups of society. However, one of the roles of the LDP Stakeholder Forum was to disseminate information to representatives for them to pass on to the groups they represent. The Delivery Agreement itself is a technical and procedural document and therefore in its very nature contains technical language which has no jargon-free substitute. However, **with reference to Diagram 2, it is proposed to replace SA and SEA with Sustainability Appraisal and Strategic Environmental Assessment.**
- To ensure further transparency in the process, **The Council undertakes to issue Terms of Reference for the LDP Key Stakeholder Forum at the next meeting, and to further clarify the rationale for membership and roles of the Forum and LDP Steering Group in the Delivery Agreement.**

Q4. Do you agree with the principles of Community Involvement as set out in subsection 4.2 of the draft Delivery Agreement?

Overwhelming answer was Yes. Although there was an acknowledgement that some groups and sections of society will not want to 'engage' in the process and in some parts of the County Borough engagement structures are weak or non-existent. More importantly it was considered that the community needs to have a feeling of confidence in the process. It was suggested that Town and Community Councils take a lead in engaging the community.

Council's response and actions proposed

- No action required

Q5. Do you think the range of community involvement methods set out in subsection 4.3 – 4.6 and Appendix 1 are appropriate to use at the various stages indicated?

There was a mixed response to this question. Some groups agreed that the methods identified were a good starting point and should not be too prescriptive to allow flexibility in the process. Other groups thought that the methods came across as 'bland' and too broad-brushed and that more innovation is required to engage people.

Some specific ideas were to use local events and shows; extensive use of the website and to place notices in doctor's surgeries / hospitals. There was also a view that the LDP should 'piggyback' other Council consultation exercises with respect to other plans and strategies. It was suggested that the Forum should be used at each stage to determine methods of involvement.

Council's response and actions proposed

- The Council considers that it needs to operate flexibly in its approach to public consultation and, in the interests of resource prudence, would not at this stage commit itself to consultation methods which would be ineffective.
- All Local Development Plan documents and reports have been, and will continue to be available on the Council's website. It has also been possible for respondents to submit their views online as well as using the standard forms. Council Officers will attend any events / meetings / forums which are they are invited to (where practicable). However the Council will rely on representatives of the Forum to make these approaches as it cannot easily identify appropriate events on its own.
- For the local area forums and particularly the topic issue groups the Council will endeavour to use, where possible, existing forums and organisations, rather than create new ones. Many of these issue groups can be found under the umbrella of the Local Strategic Partnership. LDP work will be undertaken concurrently with the review of the Community Strategy where possible. **The Council will amend the Delivery Agreement to clarify the role of existing groups and forums in the consultation process relating to the LDP.**

Q6. Does Appendix 1 of the draft Delivery Agreement make it clear when and how different people / organisations will have an opportunity to get involved in the preparation of the LDP?

Again there was a mixed response to this question. Some groups commented that Appendix 1 was clear and provided a good base to be expanded upon later. One group noted that columns 4 & 5 ('Who will be involved' and Methods of Involvement') were a little misleading and another asked for an additional column on 'how' people can be involved in the process. One group asked that Local Community Groups be included in the review and development of the evidence base.

Council's response and actions proposed

- The Council considers that Appendix 1 is clear, logical and well structured. The 'methods of involvement' column includes information on who will be involved at what stage and how they will be involved. It is unclear how Local Community Groups can be involved in the review and development of evidence, however should they wish to submit their own evidence to supplement the Council's data-gathering exercises then this is to be welcomed. However, the *LDP Manual* does not recommend that an "*extensive and time consuming Survey – Analysis stage is required before LDP production can commence*" which is why

the Council have chosen to have an ongoing evidence gathering stage up until the deposit of the LDP.

Q7. Do you consider the composition of the LDP Key Stakeholder Forum (See Appendix 3) to be adequate?

The general view was that the composition of the Key Stakeholder Forum was adequate. A number of groups however were suggested as additions:-

- Major Landowners
- PACT
- Regional Transport Consortia
- Other Specific WAG departments (eg. Enterprise, Innovation & Networks)

Council's response and actions proposed

- The Council will clarify the membership rationale in the final Delivery Agreement as stated above.
- The Council does not consider that Major Landowners should be included in the LDP Key Stakeholder Forum because they have their own private interests in land development which should appropriately be expressed (by agents) through the regular consultation processes.
- PACT (Partnerships and Communities Together) is the name given to the neighbourhood meetings that will form the structure through which Neighbourhood Policing will be delivered. In this respect these interests are already represented by the Bridgend Community Safety Partnership (which includes South Wales Police).
- The Council's Transportation department are represented by Officers at the Forum, they in-turn will notify the Regional Transport Consortia (specifically SEWTA) of LDP preparation. **The Council will add SEWTA to the Interested Party Database at Appendix 4 to the draft Delivery Agreement so that it receives notification of LDP preparation.**
- The Welsh Assembly Government's Planning Division has its own internal consultation processes with respect to other departments and has specifically requested that all LDP consultation to WAG should be directed to them only.

Q8. Do you consider the Statutory Consultees and Interested Party Database (see Appendix 4) to be adequate?

A number of additions were suggested; these included:-

- The Council of Churches
- Various Residents Groups
- Transport Organisation EST
- Operators and Landowners of the Rhiw Shopping Centre
- The Farming Community

- Boys and Girls Club in Bettws
- Divisional Police Headquarters
- Wildmill Residents Association
- Minerva Residents Association

It was noted that the database should be constantly updated and kept under review.

Council's response and actions proposed

The Council will endeavour to establish the contact details of all those Interested Parties listed by the Forum and add them to the consultation database; these names will be reflected in Appendix 4 of the Delivery Agreement.

The Council will try to ensure that the LDP consultation database is kept up-to-date. However, with over 600 consultee contact details already in the database, it will be for the individuals and organisations to keep the Council updated should any of those details change in the future.

Q9. Are there any other comments about the Delivery Agreement?

It was noted that there was a lack of synchronisation between the development of the Wales Spatial Plan, the Regional Transport Plan and LDPs. It was also noted that the LDP will be the spatial expression of the Community Strategy.

Council's response and actions proposed

The Council notes these points. However, preparation of an LDP has been highlighted as a key priority for Local Authorities by the Welsh Assembly Government and it therefore cannot be put on hold pending reviews / publication of other documents. If information from these documents becomes available before the deposit of the LDP, then the Council will be obliged to take their contents into account.

Appendix A – Delegates at LDP Key Stakeholder Forum – 15th August 2006

Present: -

Baker Associates	John Baker Cicely Postan
Bettws Communities First Partnership	Lynne Simmons
Brackla Community Council	Community Councillor W Bennett
Bridgend Biodiversity Partnership & Bridgend Heritage Partnership	Steve Moon
Bridgend Chamber of Trade	Mike Jones Lee Le Bruilly
Bridgend Children's & Young People's Partnership	Michelle Jaynes
Bridgend Community Consortium for Education and Training	Adrian Beynon
Bridgend Community Safety Partnership	John Davies PC Andrew Lawless
Bridgend County Borough Council	Councillor P A Hacking Councillor A E Davies Councillor R Deere Councillor M Quick Councillor C Teesdale Councillor K Waktins David Llewellyn Gerald Hulin * Steve Bool * Sue Jones * Stuart Ingram * Nick Lloyd * Jonathan Lane * Hayley Landon Adam Provoost Nigel Moore Richard Metford * Kwaku Opoku-Addo *
Bridgend Economic Partnership	Amy Ryall
Bridgend Environmental Partnership	Mike Jenkins
Bridgend Housing Partnership	Peter Green
Bridgend Local Access Forum	Councillor Granville
Bridgend Local Strategic Partnership	Brian Roderick
Bridgend Manufacturers Group	Tony Lewis

Bridgend Older Persons Strategy Partnership	Gordon Jones
Bridgend Partnership Board and Bridgend Local Health Board	Zoe Wallace
Bridgend Tourism Forum	John Bunker Denise Fletcher
Bridgend Town Centre Forum	Jonathan Hughes
Bridgend Town Council	Councillor David Unwin
Bridgend Waste Management Forum	Huw Jenkins
Caerau Regeneration Forum	Aled Singleton
Coity Higher Community Council	Hopkin Thomas
Communities First Team	Frances McShane
Countryside Council for Wales	Scott Hand
Coychurch Higher Community Council	Kenneth Russell
Environment Agency Wales	Suzanne Waldron
Evanstown Communities First Partnership	Jason Williams
Ewenny Community Council	Julie Baxendale
Garw Valley Regeneration Forum	Delyth Samuel
Glamorgan Gwent Archaeological Trust Ltd	Neil Maylan
Laleston Community Council	Community Councillor Norman
Llangynwyd Middle Community Council	Malcolm James
Maesteg Town Centre Forum	Helen Jeffries
Maesteg Town Council	Community Councillor Harry Fenney
Neath Port Talbot County Borough Council	Ann Marie Hurley Dave Morris
Porthcawl Regeneration Forum	Andrew Parry-Jones
Porthcawl Town Council	Mrs C P Anderson
Rhondda Cynon Taff County Borough Council	Gareth Hall Owen Jones
St Brides Minor Community Council	John Collett Brian Rees
Vale of Glamorgan Council	Victoria Abraham Lucy Turner

* = Table discussion facilitator

Appendix B – Introduction to LDP System Presentation

Moving to the Local Development Plan System in Bridgend County Borough



Bridgend
LocalDevelopmentPlan

Why the change?

Planning Delivering for Wales (2002) described the existing Unitary Development Plan System as....

- Lengthy
- Produced plans which are too detailed / complex
- Poor progression nationally. Only 10 out of 25 Local Planning Authorities have an adopted Plan (although Bridgend CBC is one of these!)
- Slow review process

It therefore proposed introducing a new Local Development Plans system for Wales

Bridgend
LocalDevelopmentPlan

Planning and Compulsory Purchase Act 2004

- Retains supremacy of the Development Plan (LDP) in the determination of planning applications:

Section 38(6):

"If regard is to be had to the development plan for the purpose of any determination to be made under the planning Acts the determination must be made in accordance with the plan unless material considerations indicate otherwise"

- Part 6 of the Act (Wales) states that Local Planning Authorities must prepare a plan for their area to be known as an LDP.

Bridgend
LocalDevelopmentPlan

What is a Local Development Plan?

- It will become the 'Development Plan' in legal terms for the determination of planning applications
- It will supersede the Unitary Development Plan
- Under WAG Plan rationalisation it is one of only four high-level Strategies which Local Authorities are required to prepare.

Bridgend
LocalDevelopmentPlan

The Four strategies are:

- Community Strategy
- Local Development Plan
- Children and Young People's Strategy
- Health, Social Care and Wellbeing Strategy

Bridgend
LocalDevelopmentPlan

What is the Function of a Local Development Plan ?

- An LDP must set out:
 - the Local Planning Authority's objectives in relation to the development and use of land in its area and include:
 - General policies for the implementation of those objectives
 - Specific policies for different areas within the authority - site specific allocations

Bridgend
LocalDevelopmentPlan

What must it take into account?

- An LDP must have regard to: -
 - Wales Spatial Plan
 - Current national planning policies (PPW, MPPW, TANs etc)
 - Community Strategy

What must it take into account?

- The Welsh Assembly Government has produced a number of documents relating to the form and content of Local Development Plans:
 - Town and Country Planning (Local Development Plans) (Wales) Regulations 2005
 - Local Development Plans Wales
 - LDP Manual
 - Planning Policy Wales Companion Guide
 - Planning your Community: A Guide to Local Development Plans

UDP and LDP Comparison

- Content

Unitary Development Plans	Local Development Plans
Compendiums including repetition of national policy, overlapping policies and detailed development control policies for every land-use.	Slimmer Document (no repetitions of national policy and limited reasoned justification)
Strategic policies not necessarily in sync with Community Strategy	Contains vision, strategy and specific policies; related to Community Strategy
Local policies often over long and complicated	Better use of Supplementary Planning Guidance

UDP and LDP Comparison

- Strategic Environmental Assessment / Sustainability Appraisal

Unitary Development Plans	Local Development Plans
Not Mandatory (although a Sustainability Appraisal was carried out)	Required

UDP and LDP Comparison

- Process

Unitary Development Plans	Local Development Plans
No adoption target	4 year target to adopt
	Full review every 4 years
No statutory continuous monitoring	Continuous monitoring
No clear statement of intended public involvement	Clear public involvement
	7 Cyclical Stages

UDP and LDP Comparison

- E-planning

Unitary Development Plans	Local Development Plans
Publication of UDP related documents on the internet was optional	Regulations require the publication of the majority of LDP documentation to be placed on the Council's web site
No facility available for representations to made on-line	Representations should be able to be submitted electronically

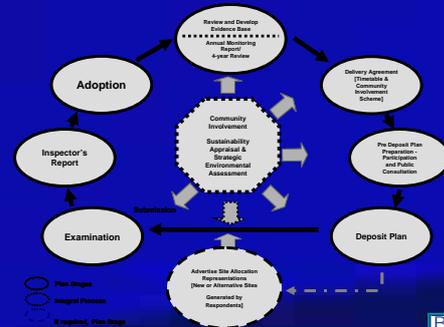
BCBC is currently developing it's planning web-pages which now includes an Interactive UDP and other planning information. All LDP Reports, Documents, Background Information, Consultation Representations and news will appear on the web site where practicable.

Preparation Process

- The LDP Preparation Process can be divided into 8 stages:

1. Review and Development of Evidence Base
2. Delivery Agreement
3. Plan Preparation
4. Deposit and Submission
5. Examination
6. Inspectors Report detailing proposed changes to the deposit LDP
7. Adoption
8. Review

Preparation Process



1. Review and Development of Evidence Base

- LDP Production should be informed by a robust evidence base.
- The Development Planning Section is already reviewing & developing the evidence base by:
 - Reviewing national policy context
 - Reviewing the local context
 - Reviewing local strategies

2. Delivery Agreement

The Delivery Agreement is a public statement that sets out the preparation timetable and how it will involve stakeholders and the community in preparing the Local Development Plan.

3. Plan Preparation

- LDP Vision & Objectives
- Strategic Options
- Public Consultation

4. Deposit LDP

What should be included?

- Introduction
- A Strategy
- Area-wide policies for development
- Major allocations of land
- Specific policies and proposals for key areas of change or protection
- Succinct reasoned justification to explain policies and to guide their implementation
- A proposals map on a geographical base.

5. Examination

- Independent Examination in Public
- What is the Inspector's criteria for assessing soundness of the LDP?
 - is it a land use plan,
 - does it conform generally with national planning policy and is set in the context of the *Wales Spatial Plan* and relevant regional strategies
 - does it contain a coherent strategy and is internally consistent with that strategy;
 - is it founded on a robust evidence base
 - does it have clear mechanisms for implementation and monitoring



5. Examination

- Independent Examination in Public
- What is the Inspector's criteria for assessing soundness of the LDP?
 - is it realistic
 - is it able to deal with changing circumstances
 - is it consistent with those elements of neighbouring authorities development plans where cross boundary issues are relevant
 - has it taken proper account of views of the community
 - has it been prepared following the proper procedures, including the sustainability appraisal/strategic environmental assessment processes.



6. Inspector's Report

- The Inspector will produce a report identifying proposed changes to the LDP
- The Inspector's Report and proposed changes are binding!



7. Adoption

The Local Authority must adopt the LDP within 8 weeks of receipt of the Inspectors report.



8. Review

- After adoption the Plan will be monitored on an annual basis
- The Plan will be reviewed at least once every 4 years.



Appendix C – Draft Delivery Agreement Presentation

Bridgend Local Development Plan Draft Delivery Agreement



What is the Delivery Agreement?

- The Delivery Agreement aims to:
- Show that Bridgend County Borough Council is meeting the legal requirements for the delivery of its new Local Development Plan.
 - Set out the local planning authority's strategy for community involvement and its links to other community involvement initiatives.
 - Identify in general terms which local community groups and other bodies need to be consulted.
 - Show how local people, community groups, and other bodies can be involved in a timely and accessible manner.
 - Show that the methods to be used to involve local people, community groups, and other bodies are suitable for the different stages of the Local Development Plan and for particular communities.
 - Show that the local planning authority can resource and manage the process effectively.
 - Show how the results of community involvement are to be fed into the preparation of the Local Development Plan and Supplementary Planning Guidance.
 - Set out the mechanisms for reviewing the relevant procedures



What does the Delivery Agreement include?

The Delivery Agreement includes :

1. The timetable for plan production up to adoption of the plan, which is definitive for the stages up to the deposit of the plan, and indicative for the remaining stages up to adoption
2. The resources that the Council will commit to the plan
3. The Community Involvement Scheme (CIS), which proposes how the Council will engage stakeholders in preparing, reviewing and amending the LDP



1. LDP Timetable

Stage 1	Review and Develop Evidence Base for LDP and SA (SEA)	April 2006 – June 2009
Stage 2	Delivery Agreement	April 2006 – January 2007
Stage 3	Pre-Deposit LDP Participation & Consultation	January 2007 – June 2008
Stage 4	Deposit LDP and Feedback	April 2008 – May 2009
Stage 5	Advertisement of 'Alternative Sites' & SA(SEA)	April 2009 – June 2009
Stage 6	Submission and Examination	July 2009 – July 2010
Stage 7	Inspectors Report	July 2010 – September 2010
Stage 8	Adoption	July 2010 – October 2010
Stage 9	Annual Monitoring Report and Review of LDP	October 2010 onwards



1. LDP Timetable

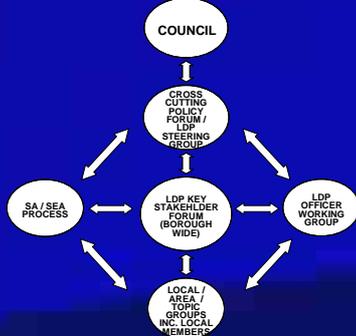


2. Resources

The Delivery Agreement outlines both the financial and staff resources which the Council will commit to the preparation of the Local Development Plan.



Inter-relationships and Lines of Accountability



Bridgend
LocalDevelopmentPlan

3. Community Involvement Scheme (CIS)

The CIS seeks to:

- detail how the LDP will be prepared, developed, monitored and reviewed in partnership with the community and other stakeholders in a structured, effective, transparent and inclusive way;
- seek to establish a consensus between stakeholders on the Plan's aims and objectives and in its options and preferred strategy;
- detail how the Council will effectively engage with the community in the preparation of Supplementary Planning Guidance (SPG), to certain policies of the LDP; and
- use these processes to produce a 'sound' plan.

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LocalDevelopmentPlan

3. Community Involvement Scheme (CIS)

The CIS contains:

- Principles of Community Involvement;
- Process of Community Involvement;
- Methods of engaging the Community;
- Use of the Citizens Panel;
- Document Availability and Deposit Locations;
- Consensus Building issues; and
- Relationships between LDP and other strategies

Bridgend
LocalDevelopmentPlan

Appendix 1: Bringing it all together

DEFINITIVE STAGES

Stage 2: Delivery Agreement (Regulation 9)

Stage in the LDP Preparation Process 1	Purpose 2	Timescale 3	Who will be involved: 4	Methods of involvement: 5	Likely Outcomes & Reporting Mechanisms 6	Resources 7
Draft Delivery Agreement The Draft Delivery Agreement comprises the Local Planning Authority's proposed timetable for the preparation of the LDP together with its Community Involvement Scheme (CIS).	To inform stakeholders that the Council is preparing a LDP and seek community involvement. To seek Views of stakeholders and consultees on the content of the Draft Delivery Agreement	Start: April 2006 Finish: September 2006	Development Planning Team Other Council Officers LDP Steering Group LDP Key Stakeholder Forum Council All Specific consultation Bodies UK Government Departments General Consultation	Report to: LDP Key Stakeholder Forum LDP Steering Group Council Letters and Draft Delivery Agreement Sent to specific consultation bodies. Letters sent to all Other consultees. Notice of Commencement of LDP Preparation, then Draft Delivery Agreement placed on Council's Web Site.	Any comments will be considered and Draft Delivery Agreement amended if required. A summary of comments received With Delivery Agreement presented to LDP Steering Group. A summary of comments received With Delivery Agreement presented to Council. Council resolution Will be requested to Approve the (revised).	Development Planning Team Administrative Support Other Council Staff ICT Support Printing Costs Postage Costs Press / Advert Costs

Consultation on the Draft Delivery Agreement

- Consulting on the Consultation!
- Consultation Period: 3rd August – 8th September 2006
- Key Stakeholder Forum – 15th August 2006
- Documents available to inspect with response forms in all County Borough libraries and the Planning Department
- Documents available to view online; responses can be submitted via the web site using on-line form
- All responses will be posted on web site
- Feel free to contribute in writing any observations from your organisation which may be raised after today's Forum meeting

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What happens next?

After the close of the consultation period:

- LDP Steering Group will consider all written representations received, plus outcomes of Key Stakeholder Forum
- LDP Steering Group will recommend any changes to the Draft Delivery Agreement to Council
- Once agreed, Council will formally submit approved Delivery Agreement to the Welsh Assembly Government
- Once agreed Final Delivery Agreement will be published and kept under review

Bridgend
LocalDevelopmentPlan

Questions?



Contact Details

- Development Planning Section
Planning Department, Environmental
& Planning Services Directorate,
Civic Offices, Angel Street,
Bridgend, CF31 4WB
- Telephone: 01656 643165 / 162 / 169
- Email: developmentplanning@bridgend.gov.uk
- Website: www.bridgend.gov.uk click on 'Planning'



Appendix D – Summary of Action Points and Changes to the Draft Delivery Agreement

1. The Council will undertake to hold consultation periods on future LDP documents for at least 6 weeks and will avoid August and Christmas. Where this is not possible the consultation period will be extended, as appropriate.
2. The Council will undertake to hold LDP Stakeholder Forum meetings either in the week before public consultation begins or at the latest in the first week of consultation.
3. With reference to Diagram 2, it is proposed to replace 'SA' and 'SEA' with 'Sustainability Appraisal' and 'Strategic Environmental Assessment'.
4. The Council undertakes to issue Terms of Reference for the LDP Key Stakeholder Forum at the next meeting, and to further clarify the rationale for membership and roles of the Forum and LDP Steering Group in the Delivery Agreement.
5. The Council will amend the Delivery Agreement to clarify the role of existing groups and forums in the consultation process relating to the LDP.
6. The Council will add SEWTA to the Interested Party Database at Appendix 4 to the draft Delivery Agreement so that it receives notification of LDP preparation.
7. The Council will endeavour to establish the contact details of all those Interested Parties listed by the Forum and add them to the consultation database; these names will be reflected in Appendix 4 of the Delivery Agreement.

BRIDGEND LOCAL DEVELOPMENT PLAN (LDP)

KEY STAKEHOLDER FORUM

Draft Terms of Reference

Remit of the Forum.

1. The Key Stakeholder Forum will be a consultative body which will be accountable to and inform the LDP Steering Group, throughout plan preparation. It will also advise and inform LDP Officers Working Group(s) when required.
2. Members of the Forum will be invited on the understanding that they will be representing the interests of their parent body. An important role for each member will therefore be to disseminate LDP information to the persons / organisations which they represent in order to facilitate extended consultation on the Plan using existing structures.
3. The Forum will have a duty to assess potential options, identify alternative options, reassess and review options in the light of representations made upon the LDP, and to take due account of the Sustainability Appraisal process at all stages of plan preparation.
4. The views of the Forum will be reported to the LDP Steering Group for consideration. It will be the duty of the LDP Steering Group to closely scrutinise, and critically evaluate the input and views of the Key Stakeholder Forum. Where appropriate, the Steering Group will be required to arbitrate on any opposing viewpoints which may emerge from the Forum with a view to reaching a consensus, where possible, on key issues of policy and emerging Plan proposals.
5. Subject to the agreement of the LDP Steering Group, the Forum may establish smaller LDP Key Issue or Area-Based Groups, the remit of which will be to address particular topics, areas, and issues at different stages of plan preparation. In this regard, existing groups, partnerships and organisations will be used wherever appropriate..

Composition of the Forum.

6. The initial composition of the Forum shall be as set out in Appendix 3 of the LDP Delivery Agreement.
7. The Forum will normally comprise a single representative from each of the key partnerships, operational and other groups and forums so specified. These currently include representatives from within the corporate structures of the Council, the Welsh Assembly Government, Town and Community Councils within the County Borough, and neighbouring Unitary Authorities and Community Councils. Representatives of the 'designated Consultation Bodies' for SEA of the Plan, and selected regional organisations are also included. Relevant Officers of the Council will attend as appropriate.

8. Subject to the constraint imposed by overall numbers attending (see Section 12), the Council will not unreasonably deny a request for more than one representative from any organisation to attend any meeting of the Forum.
9. It is likely that new key stakeholder groups whose input to the LDP could be useful and beneficial may emerge during plan preparation. In these circumstances it will be open to the LDP Steering Group to extend an invitation to such groups / organisations to join the Forum. In urgent circumstances such an invitation can be extended at the discretion of the Assistant Director – Planning Services/Head of Development Planning subject to verbal agreement of the Chairperson of the LDP Steering Group .
10. All members of the LDP Steering Group will be standing representatives of the Council on the LDP Key Stakeholders Forum.
11. The Chairperson of the LDP Steering Group (or nominated Deputy) will be the Chairperson of the LDP Key Stakeholders Forum. If neither the Chairperson of the LDP Steering Group nor nominated Deputy is available, the Assistant Director – Planning Services/Head of Development Planning may chair the Forum subject to prior verbal agreement of the Chairperson of the LDP Steering Group to that effect.
12. Representation on the Forum shall not exceed 90 (ninety) persons, including members of the LDP Steering Group, but excluding Council Officers in attendance.

Meetings of the Forum.

13. Meetings of the Forum will take place at those stages of the plan preparation process as confirmed in the LDP Delivery Agreement.
14. Meetings of the Forum will normally be convened either in the week before a public consultation period on the LDP commences, or at the latest during the first week of that respective consultation period.
15. The LDP Steering Group will have the additional discretion to convene meetings of the Forum at suitable venues and times of its choosing at any time during Plan preparation, and may depart from the normal arrangements stated in (13) and (14) above in the interests of maintaining, where possible, the timescales confirmed in the LDP Delivery Agreement.
16. Meetings of the Forum will be serviced by the LDP Officers Working Group, and other Council officers as appropriate

APPENDIX B

APPENDIX 3

COMPOSITION OF THE LDP KEY STAKEHOLDER FORUM

Representatives of the following key partnerships, operational and other groups and forums that are already in existence within the corporate structures of the Council, the Welsh Assembly Government, Town and Community Councils within the County Borough, neighbouring Unitary and Community Councils, the 'designated Consultation Bodies' for SEA, selected regional organisations, and relevant Officers of the Council will be invited to form the **LDP Key Stakeholder Forum**

- Bridgend Local Strategic Partnership (LSP) (Community Strategy)
- Bridgend Partnership Board (Health, Social Care and Wellbeing)
- Bridgend Community Safety Partnership (Crime and Disorder)
- Bridgend Children and Young People's Framework Partnership
- Bridgend Community Consortium for Education and Training (CCET)
- Bridgend Local Health Board
- Bridgend Older Persons Strategy Partnership
- Bridgend Economic Partnership
- Bridgend Environmental Partnership
- Bridgend Biodiversity Partnership
- Bridgend Heritage Partnership
- Bridgend Housing Partnership
- Bridgend Community Health Council
- Bridgend Local Access Forum
- Bridgend Tourism Forum
- Bridgend CB Waste Management Forum
- Bridgend Manufacturers Group
- Bridgend Association of Voluntary Organisations (BAVO)
- Regeneration Forums and Strategy Groups
- Communities First Partnerships
- Local Chambers of Trade
- Welsh Assembly Government
- Town and Community Councils within the County Borough
- Cadw (Welsh Historic Monuments)
- Countryside Council for Wales
- Environment Agency Wales
- Neath Port Talbot County Borough Council
- Rhondda Cynon Taf County Borough Council
- Vale of Glamorgan Council
- Colwinston Community Council (neighbouring Community Council)
- Ewenny Community Council (neighbouring Community Council)
- Gilfach Goch Community Council (neighbouring Community Council)
- Llangan Community Council (neighbouring Community Council)
- Llanharan Community Council (neighbouring Community Council)
- St. Bride's Major Community Council (neighbouring Community Council).

NB New key stakeholder groups may emerge as plan preparation proceeds whose input to the Plan may also be useful and beneficial. Any such additional representation on the **LDP Key Stakeholder Forum** must, however be considered and agreed by the **LDP Steering Group** and the Council. Provision will need to be put in place to vary the membership of the LDP Key Stakeholder Forum as circumstances arise.

BRIDGEND LOCAL DEVELOPMENT PLAN (LDP)

KEY STAKEHOLDER FORUM

Terms of Reference

(As approved by Bridgend County Borough Council at its Second Extraordinary Meeting held on the 28th December 2006)

Remit of the Forum.

1. The Key Stakeholder Forum will be a consultative body which will be accountable to and inform the LDP Steering Group, throughout plan preparation. It will also advise and inform LDP Officers Working Group(s) when required.
2. Members of the Forum will be invited on the understanding that they will be representing the interests of their parent body. An important role for each member will therefore be to disseminate LDP information to the persons / organisations which they represent in order to facilitate extended consultation on the Plan using existing structures.
3. The Forum will have a duty to assess potential options, identify alternative options, reassess and review options in the light of representations made upon the LDP, and to take due account of the Sustainability Appraisal process at all stages of plan preparation.
4. The views of the Forum will be reported to the LDP Steering Group for consideration. It will be the duty of the LDP Steering Group to closely scrutinise, and critically evaluate the input and views of the Key Stakeholder Forum. Where appropriate, the Steering Group will be required to arbitrate on any opposing viewpoints which may emerge from the Forum with a view to reaching a consensus, where possible, on key issues of policy and emerging Plan proposals.
5. Subject to the agreement of the LDP Steering Group, the Forum may establish smaller LDP Key Issue or Area-Based Groups, the remit of which will be to address particular topics, areas, and issues at different stages of plan preparation. In this regard, existing groups, partnerships and organisations will be used wherever appropriate..

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8. Subject to the constraint imposed by overall numbers attending (see Section 12), the Council will not unreasonably deny a request for more than one representative from any organisation to attend any meeting of the Forum.
9. It is likely that new key stakeholder groups whose input to the LDP could be useful and beneficial may emerge during plan preparation. In these circumstances it will be open to the LDP Steering Group to extend an invitation to such groups / organisations to join the Forum. In urgent circumstances such an invitation can be extended at the discretion of the Assistant Director – Planning Services/Head of Development Planning subject to verbal agreement of the Chairperson of the LDP Steering Group.
10. All members of the LDP Steering Group will be standing representatives of the Council on the LDP Key Stakeholders Forum.
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15. The LDP Steering Group will have the additional discretion to convene meetings of the Forum at suitable venues and times of its

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16. Meetings of the Forum will be serviced by the LDP Officers' Working Group, and other Council officers as appropriate.

DAL/GAH/10/11/06.

APPENDIX C

Welsh Council
Local Government Commission
Planning & Environment
Development Services Unit
Civic Centre
2nd Floor
Pŷn Iffordd, Llanidloes
CP1 1JH

Tel: 01455 643443
Fax: 01455 643198
www.bridgend.gov.uk
planning@bridgend.gov.uk



Planning Department
Development & Planning Management
Bridgend Civic Centre
Civic Office
2nd Floor
Pŷn Iffordd
CP1 1JH

Tel: 01455 643443
Fax: 01455 643198
www.bridgend.gov.uk
planning@bridgend.gov.uk

Ref: 51A158C/SA1
51A158C/SA1

Development Planning
9th November 2006

Dear Sir / Madam

BRIDGEND LOCAL DEVELOPMENT PLAN: CALL FOR CANDIDATE SITES

Bridgend County Borough Council submitted the Delivery Agreement for its Local Development Plan (LDP) to the Welsh Assembly Government on 8th October 2006. The submitted document and representations made to the draft Delivery Agreement can be found on the Council's web site, www.bridgend.gov.uk; they are also available to view at the Planning Department at the Council's Civic Offices.

The next stage in the LDP process involves work on preparing Pre-deposit proposals. The first action is to ask developers, land-owners and the public to nominate 'Candidate Sites' for potential allocation in the emerging LDP. This could be for any land use including: residential, employment, retailing, public open space, minerals, waste, community uses or tourism. Whilst there is no guarantee that sites suggested at this stage will be taken forward, it will enable the Council to assess the availability of sites when formulating a Plan Vision and subsequent Strategic Options for development across the County Borough.

If you would like to nominate a site for consideration, a plan outlining the site with an Ordnance Survey base should be submitted together with an assessment questionnaire form (enclosed). The form asks general questions about the site and its characteristics and will aid in its future assessment for LDP purposes. The form may be copied if necessary but additional copies are available from the Planning Department on request or can be downloaded from the Council's web site. The process by which the Council will handle submissions is outlined overleaf.

The deadline for return of plans and forms is 4.30pm on Wednesday 31st January 2007 although earlier submissions than this date would be appreciated.

Any sites submitted without a completed assessment questionnaire form will be returned to the proposer. However, Officers from the Council's Development Planning team are able to assist in the completion of the questionnaire if required. Further information is available from the team: telephone 01455 643670 / 3165 / 3162 or email: developmentplanning@bridgend.gov.uk

Yours faithfully,

for ASSISTANT DIRECTOR (PLANNING SERVICES)

Bridgend County Borough Council is preparing a Local Development Plan (LDP) for the County Borough.

The next stage is to ask developers, land-owners and the public to nominate 'Candidate Sites' for potential allocation in the emerging LDP.

This could be for any land use including:

- residential,
- employment,
- retailing,
- public open space,
- minerals development
- waste developments,
- community uses,
- tourism uses,

If you would like to nominate a site for consideration, a plan outlining the site with an Ordnance Survey base should be submitted together with an assessment questionnaire form to the Council's Planning Department.

COPIES OF THE ASSESSMENT QUESTIONNAIRE FORM ARE AVAILABLE FROM THIS LIBRARY

The deadline for return of plans and forms is 4.30pm on Wednesday 31st January 2007.

Officers from the Council's Development Planning team are able to assist in the completion of the questionnaire if required.

Development Planning, Planning Department,
Environmental & Planning Services Directorate,
Bridgend County Borough, Civic Offices,
Angel Street, Bridgend. CF31 4WB



For more information contact the Development Planning Team

Phone:
(01656) 643670

E-mail:
developmentplanning@bridgend.gov.uk
or for further information relating to the LDP log on to:
www.bridgend.gov.uk

**BRIDGEND COUNTY BOROUGH COUNCIL – CYNGOR BWRDEISTREF SIROL
PEN-Y-BONT AR OGWR**

BRIDGEND LOCAL DEVELOPMENT PLAN

CALL FOR CANDIDATE SITE SUBMISSIONS

Bridgend County Borough Council is preparing a Local Development Plan (LDP) for the County Borough. The next stage in the LDP process involves work on preparing Pre-deposit proposals. The first action is to ask developers, land-owners and the public to nominate 'Candidate Sites' for potential allocation in the emerging LDP.

This could be for any land use including:

- residential,
- employment,
- retailing,
- public open space,
- minerals development
- waste developments
- community uses
- tourism uses

There is no guarantee that sites suggested at this stage will be taken forward, however their submission will enable the Council to assess the availability of sites when formulating a Plan Vision and subsequent Strategic Options for development across the County Borough.

If you would like to nominate a site for consideration, a plan outlining the site with an Ordnance Survey base should be submitted together with an assessment questionnaire form. The form asks general questions about the site and its characteristics and will aid in its future assessment for LDP purposes.

Copies of the assessment questionnaire form are available: from the Planning Department, Civic Offices, Angel Street, Bridgend, CF31 4WB during normal office hours; at any library within the County Borough; to download from the Council's website at www.bridgend.gov.uk (Click on 'Planning') **Any sites submitted without a completed assessment questionnaire form will be returned to the proposer**

The deadline for return of plans and forms is 4.30pm on **Wednesday 31st January 2007** although earlier submissions than this date would be appreciated.

Officers from the Council's Development Planning team are able to assist in the completion of the questionnaire if required. Further information is available from the team: telephone 01656 643670 / 3165 / 3162 or email: developmentplanning@bridgend.gov.uk

Rhodri-Gwynn Jones BSc, C.Eng., M.I.C.E.
Director of Environmental and Planning
Services,
Bridgend County Borough Council,
Civic Offices, Angel Street,
BRIDGEND CF31 4WB.

Rhodri-Gwynn Jones BSc, C.Eng., M.I.C.E.
Cyfarwyddwr Gwasanaethau
Amgylcheddol a Chynllunio,
Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr,
Swyddfeydd Dinesig, Stryd yr Angel,
PEN-Y-BONT AR OGWR, CF31 4WB.

DATED 09/11/2006

DYDDIAD 09/11/2006

Bridgend Local Development Plan

Candidate Site Assessment Questionnaire



Bridgend County Borough Council, Planning Services Department, PO Box 4,
Civic Offices, Angel Street, Bridgend, CF31 4WB, Telephone: 01656 643643
Fax: 01656 643190 E-mail: planning@bridgend.gov.uk

NOTES

Please complete one form for every site proposed. This form may be photocopied if necessary. Forms and plans should be submitted to the Assistant Director - Planning Services, Bridgend County Borough Council, Civic Offices, Angel Street, Bridgend, CF31 4WB by 4.30pm on 31st January 2007. Please note that the content of all plans and assessment forms submitted will be made available for public inspection.

Officers from the Council's Development Planning team are able to assist in the completion of the questionnaire if required. For more information telephone: 01656 643670 or e-mail: developmentplanning@bridgend.gov.uk

The plan submitted with the site should be on an Ordnance Survey base and contain the following information:

- An outline of the site submitted in **Red**
- Any additional land in the ownership of the proposer outlined in **Blue**
- Indicative access points to the site with any third-party land required for access outlined
- Any proposed changes to an existing settlement boundary from the adopted Bridgend Unitary Development Plan
- Any areas of the site liable to flooding
- Any information given in answer to the questions below that can be displayed spatially

Please complete in BLOCK CAPITALS and in Blue ink only. This form can be photocopied. All the 2 pages should be included, as correspondence will be sent to the agent and not to the person/organisation given in Section 1.

SECTION 1 - CONTACT DETAILS OF SITE PROPOSER

Name: _____

and/or Organisation: _____

Address: _____

Postcode: _____ Telephone No: _____ Fax No: _____

E-mail: _____ Please specify your preferred method of communication: Letter E-mail

SECTION 2 - CONTACT DETAILS OF THE PROPOSER'S AGENT/APPLICANT

Name of Agent (if appropriate): _____

Person to Contact: _____

Address: _____

Postcode: _____ Telephone No: _____ Fax No: _____

E-mail: _____ Please specify your preferred method of communication: Letter E-mail

SECTION 3 - SITE DETAILS

Name / Location of Site: _____

OS Grid Reference: _____ Area of Site in Hectares: _____

Existing Use of Site: _____

Proposed LDP allocation of Site: _____

3.3.10 ACCESSORY QUESTIONS

4(a) - General

Question	Response		Further Information Required	Further Information <small>(Please indicate where to be entered when necessary)</small>
	Yes	No		
Is the site wholly in the ownership of the proposer?			If no, has the owner / additional owners been notified of the sites submission for consideration? Please give contact details where necessary	
Are there any restrictive covenants relating to the use of the land / buildings contained within the site?			If yes, please give details and attach copies of any such covenant where available	
Would the allocation of the site require an alteration to a settlement boundary contained within the adopted Bridgend Unitary Development Plan?			If yes, please state which settlement boundary would be affected and indicate on the submitted plans the existing and proposed settlement boundary	
Would the allocation of the site require a change in a land-use allocation contained within the adopted Unitary Development Plan?			If yes, please state the name and policy number of the existing allocation	

4(b) - Accessibility

Question	Response		Further Information Required	Further Information <small>(Please indicate where to be entered when necessary)</small>
	Yes	No		
Is the site accessible from the public highway?			If no, have third party land holders been notified of the sites submission for consideration? Please give contact details where necessary	
Is the site located within 400m of a public transport access point, i.e. train station or bus stop?			If yes, please give route frequency and destination information	
Is the site located within 400m of a community facility (shop / commercial services)?			If yes, please give details of shops and services	
Does the site's stability / topography present an obstacle to its development?			If yes, please give any details of any remedial works necessary	

4(a) - Environmental

Question	Response		Further Information Required	Further Information <small>(Please complete section if it is relevant to the proposed development)</small>
	Yes	No		
Is the site located in an area of flood-risk or adjacent to a watercourse?			If yes, give details of flood-risk data and extent to which the site is affected.	
Is the site on previously developed land (brownfield)?			Previously Developed Land is defined by Figure 2.1 of Planning Policy Wales. Please give details of how the site meets the criteria.	
Would development of the site result in the loss of agricultural land (in current / previous use)?			If yes, give the site's Agricultural Land Classification.	
Is the site located in an area designated as a local, regional or national area for landscape, ecological or cultural purposes?			If yes, give details of classification.	
Is there a risk that the site could consist of contaminated land?			If yes, give dates and details of possible contamination sources.	

4(b) - Site Context

Question	Response		Further Information Required	Further Information <small>(Please complete section if it is relevant to the proposed development)</small>
	Yes	No		
Is the site located within 100m of existing water, sewerage, electrical, gas and telecommunications systems?			If no, describe how access to these services will be obtained.	
If the site is proposed for residential development, are there any industrial / employment uses adjacent to the site?			If yes, give details of their location and mark on accompanying plan.	
If the site proposed is for employment / waste / materials development, are there any residential properties adjacent to the site or within 200m of the site?			If yes, give details of their location and mark on accompanying plan.	

Media Release

I'r Cyfryngau



REF: MR11/05/07

15 May 2007

Local Development Plan Candidate Site Register Published

Bridgend County Borough Council has now published a Register of Candidate Sites as part of the Local Development Plan.

The register is a statement of facts of the sites which have been submitted at this stage and is not a public consultation document. The inclusion of a site within this register does not confirm that it will be taken forward in the LDP, nor does it imply any preference of the local planning authority regarding its merits. This includes any candidate sites which have been submitted by internal departments within the council.

The register is available to view on the council's website (www.bridgend.gov.uk), at the planning department reception at Civic Offices, Angel Street, Bridgend, and at all libraries within the county borough. Hard copies are available to purchase at a price of £30 (plus £5 postage and packing). Copies are also available on CD free of charge. If the council's preferred development strategy indicates that further land is required for development, the sites will be assessed against the strategy for their possible inclusion within the LDP.

The plan will eventually set out land-use planning policies in the county borough which are used to determine planning applications. The plan could potentially have a direct effect on the lives of every resident of the county borough as well as having major implications for land owners.

For more information on LDP preparation phone (01656) 643 165/162 or email developmentplanning@bridgend.gov.uk. All documents relating to the LDP can be found on the planning web pages of www.bridgend.gov.uk.

Ends - for more information, contact the Public Relations team on (01656) 643663, 643217 or 643210. Website: www.bridgend.gov.uk Email: talktous@bridgend.gov.uk

Media Release

I'r Cyfryngau



REF: MR11/05/07

15 May 2007

Local Development Plan Candidate Site Register Published

Bridgend County Borough Council has now published a Register of Candidate Sites as part of the Local Development Plan.

The register is a statement of facts of the sites which have been submitted at this stage and is not a public consultation document. The inclusion of a site within this register does not confirm that it will be taken forward in the LDP, nor does it imply any preference of the local planning authority regarding its merits. This includes any candidate sites which have been submitted by internal departments within the council.

The register is available to view on the council's website (www.bridgend.gov.uk), at the planning department reception at Civic Offices, Angel Street, Bridgend, and at all libraries within the county borough. Hard copies are available to purchase at a price of £30 (plus £5 postage and packing). Copies are also available on CD free of charge. If the council's preferred development strategy indicates that further land is required for development, the sites will be assessed against the strategy for their possible inclusion within the LDP.

The plan will eventually set out land-use planning policies in the county borough which are used to determine planning applications. The plan could potentially have a direct effect on the lives of every resident of the county borough as well as having major implications for land owners.

For more information on LDP preparation phone (01656) 643 165/162 or email developmentplanning@bridgend.gov.uk. All documents relating to the LDP can be found on the planning web pages of www.bridgend.gov.uk.

Ends - for more information, contact the Public Relations team on (01656) 643663, 643217 or 643210. Website: www.bridgend.gov.uk Email: talktous@bridgend.gov.uk

BRIDGEND COUNTY BOROUGH COUNCIL

REPORT TO EXTRAORDINARY COUNCIL

29 NOVEMBER 2007

REPORT OF THE EXECUTIVE DIRECTOR - ENVIRONMENT

PLANNING SERVICES

**1. BRIDGEND LOCAL DEVELOPMENT PLAN (LDP)
REPORT OF STAKEHOLDER CONSULTATION ON DRAFT LDP
VISION, DRAFT STRATEGIC GROWTH OPTIONS**

1.1 Purpose of Report

- 1.1.1 To provide feedback on the Key Stakeholder consultation on the LDP Draft Vision and Strategic Growth Options, and the outcome of the independent sustainability appraisal and SEA Scoping of those issues.
- 1.1.2 At the meeting on 13 November 2007, the Cross Cutting Policy Forum noted the feedback and outcome.

1.2 Connection to Corporate Improvement Plan / Other Corporate Priorities

- 1.2.1 The Bridgend Local Development Plan (LDP) is one of the four 'high level' strategies which, under the Assembly Government's Plan rationalisation, must be prepared and approved for the County Borough. The other three being the Council's Community Strategy, the Health, Social Care & Wellbeing Strategy, and the Children and Young People's Strategy.
- 1.2.2 The LDP should express, in appropriate land use planning terms, those elements of the Community Strategy that relate to the development and use of land provided that they are in conformity with national and international policy and obligations.
- 1.2.3 The seven priority areas of the Corporate Improvement Plan are cross-linked to the objectives of the Community Strategy.

1.3 Background

- 1.3.1 The approved Delivery Agreement (DA) for the Bridgend Local Development Plan (LDP) sets out the process and timetable for preparation. The Council is currently at Key Stage 3 – the Pre Deposit LDP Participation and Consultation.

1.3.2 At this stage, *LDP Wales (2005)* requires that the Council establishes a Vision, a number of Strategic Options, and a 'Preferred' Strategy for delivering the future land use allocations of the LDP.

1.3.3 At the meeting on the 14th June 2007, Council resolved:

(1) That Council approves the draft vision, the draft Strategic Growth Options and recommends both the Trend-Based Growth Strategy Option and the UDP Growth Based Strategy Option for particular consideration by the Key Stakeholders Forum.

(2) That a further report be awaited accordingly, following the Key Stakeholders Forum Meeting.
(Min. No. 882 refers).

1.3.4 The meeting of the LDP Key Stakeholders Forum was held on the 28th June 2007. It was followed by a Key Stakeholder Consultation process which ended on the 10th August 2007.

1.3.5 The report of the LDP Key Stakeholder Forum is attached as **Appendix 1**. The proposed Agenda, Draft LDP Vision, and the Draft Strategic Options Briefing Paper were sent to LDP Key Stakeholders 10 days in advance as it was anticipated that this would:

- enable Key Stakeholders to disseminate the relevant information and consult with their respective organisations and/or membership, before and after the Forum, in order to respond in a considered way to the Council's proposals; and
- provide an opportunity for those Key Stakeholders, who could not attend the Forum, to consider the Council's proposals, and respond to them in writing.

All the representations received, together with the Council's suggested responses, are tabulated in **Appendix 2**.

1.3.4 Those Key Stakeholders who were unable to attend the Forum on the 28th June 2007, received a follow-up letter to which was attached the full Stakeholder's Pack.

1.4 Current Situation

(a) The Draft Vision

1.4.1 All Key Stakeholders who responded, either verbally at the Forum or in writing, agreed with the Draft Vision for the LDP, and they considered that it adequately incorporated the objectives of the Council's Community Strategy.

1.4.2 The Council's previous approval of the Draft Vision for the LDP has therefore been endorsed by Key Stakeholders, and it can be included

unaltered within the Draft Pre-Deposit Proposals for formal consultation.

(b) The Draft Strategic Growth Options

- 1.4.3 *LDP Wales (2005)* requires, as one of its tests of soundness, that
- 1.4.4 “...*the Strategy, policies, and allocations of the LDP are realistic and appropriate, having considered the relevant alternatives, and that they are founded on a robust evidence base.*”
- 1.4.4 All five Draft Strategic Growth Options which were generated, and subsequently approved by the Council on 14 June, met this initial requirement at the time.
- 1.4.5 The Stakeholder Forum was requested, however, to give particular consideration to the merits of the Trend-Based Growth Strategy Option and the UDP Growth Based Strategy Option with a view to informing which should be taken forward as the ‘Preferred Strategy for Growth’ in the LDP.
- 1.4.6 The outcome of the Forum on this issue was generally inconclusive, as Key Stakeholders were undecided on the merits of pursuing either of the two preferred Options.
- 1.4.7 Key Stakeholders were also encouraged to send any further views in writing to the Planning Department by the 10th August 2007. As can be seen from **Appendix 2**, disappointingly few written responses were received to this further ‘Key Stakeholder Consultation’. Ten responses were received, only four of which were submitted by Key Stakeholders. The remainder were submitted by representatives of local groups in the Blackmill area, who were not specifically targeted as Key Stakeholders by the Council.
- 1.4.8 Of the four responses received from ‘Key Stakeholders’, two were received from Community Councils, one from the neighbouring local planning authority of Neath Port Talbot CBC, and the other from the Environment Agency Wales (EAW). Neither Brackla CC nor the Environment Agency specified which option they favoured. The former stated that adequate infrastructure should be planned for meeting any future level of housing growth, whilst the EAW did provide some additional information to inform the SEA Scoping of the LDP. Merthyr Mawr CC favoured proceeding with the ‘UDP Growth Strategy’ whilst Neath Port Talbot CBC favoured the ‘Trend-Based Growth Strategy’ Option as the most realistic.
- 1.4.9 The representations received from local groups in the Blackmill area, focused on matters of more local concern including the need for closer consultation with community groups. It is perhaps of note, however,

that two of them stated a preference for the 'Trend-Based Growth Strategy' Option.

1.4.10 The outcome of the written responses to the 'Key Stakeholder Consultation' was, therefore, also inconclusive.

(c) Sustainability Appraisal (SA) and SEA Scoping of the Strategic Growth Options

1.4.11 *LDP Wales (2005)* states that:-

To be effective, sustainability appraisal should be fully integrated into the plan making process and should provide input at each stage when decisions are taken.

and that:-

*Throughout the pre-deposit participation stage (LDP Regulation 14), authorities must undertake sustainability appraisal of the strategic options and work with the environmental consultation bodies (under the SEA Regulations) and stakeholders on an **initial sustainability appraisal report**. This will inform the decision making process and identification and development of the preferred strategy.*

At pre-deposit public consultation stage ((LDP Regulation 15), authorities must consult on the initial sustainability appraisal report alongside the preferred strategy document.

1.4.12 An initial independent Sustainability Appraisal of the 'Strategic Growth Options' was carried out by Baker Associates, who made a presentation to the Key Stakeholders' Forum. Copies of a Briefing Paper were also distributed at the Forum, and later forwarded to absentees to inform the consultation process . A copy of the 'Briefing Paper' is attached as **Appendix 3**.

1.4.13 Only two of the three 'environmental consultation bodies' namely the EAW and the Countryside Council for Wales (CCW) were able to attend the LDP Key Stakeholder Forum on the 28th June 2007. The third body – Cadw - were sent a copy of the SA 'Briefing Paper' as an absentee. Neither CCW nor Cadw subsequently responded to the Stakeholder Consultation, and none of the three bodies responded to the SA Appraisal and SEA Scoping Paper.

1.4.14 Sections 3, 4 and 5 of Bakers 'Briefing Paper' detail the appraisal of the strategic options, their summary and conclusions, and how the concept of sustainable development can be moved forward with the LDP Strategy. However, it should be noted that Section 3 of the Briefing Paper, specifically states:-

At this very early stage in planning for the County Borough it is difficult to predict with any degree of accuracy the likely impacts on sustainable development of options that set out only marginally differing levels of growth to 2021. Therefore the appraisal considers the growth options on a scale from low to high instead of each of the five options individually.....

1.4.15 Even given this caveat, however, Bakers' findings provide very helpful input to the general assessment of the sustainable credentials of the five options, more particularly, the two options upon which the Key Stakeholders' Forum was asked to focus.

1.4.16 The general interpretation which can be put on Bakers' findings is that less growth does not necessarily equate to greater sustainability. Rather, the underlying sentiment of the SA/SEA Briefing Paper is that what matters most is the vision that the Council and Stakeholders share for the future of the County Borough; and that this should help guide the level of development toward a defined goal for the area up to 2021.

1.4.17 More specifically, paragraph 3.12 of the Briefing Paper states:-

However, whichever growth level is chosen, many sustainability impacts will be dependent on how this is distributed around the County Borough, such as connections to jobs and services and support to areas in need of regeneration.....

1.4.18 Bakers' findings therefore suggest that an additional consideration of the spatial consequences of pursuing any of the options could provide further clarity and transparency in choosing the preferred strategic option.

1.4.17 A spatial assessment of the two preferred options is the subject of a separate item to this Council

1.5 Effect upon Policy Framework & Procedure Rules

1.5.1 The Bridgend Local Development Plan Delivery Agreement (November 2006) is in place and has been approved by the Welsh Assembly Government.

1.6 Legal Implications

1.6.1 The requirements of the Planning and Compulsory Purchase Act 2004 are being met in the preparation of the Bridgend LDP.

1.7. Financial Implications

1.7.1 None.

1.8 Recommendations

- 1.8.1 That Council notes the content of this Report, and approves the Draft Vision for the LDP, as endorsed by Key Stakeholders, for inclusion within the Draft Pre-Deposit Proposals for formal consultation.

1.9 Contact Officer:-

- 1.9.1 David A. Llewellyn.
Head of Development Planning.
Tel. No. (01656) 643161, e-mail: David.Llewellyn@bridgend.gov.uk

1.10 Background documents:-

- File: 31A158A – LDP Delivery Agreement.
File: 31A158C – LDP Sustainability Appraisal/SEA/AA.
File: 31A158D – LDP Visioning & Strategic Options.

RHODRI-GWYNN JONES
EXECUTIVE DIRECTOR – ENVIRONMENT

23rd November 2007

Appendix 1

Report of LDP Key Stakeholder Forum

Vision and Strategic Options

28th June 2007

Report of LDP Key Stakeholder Forum Vision and Strategic Options

28th June 2007

Bridgend Rugby Club, Tondu Road

1. Introduction

The second meeting of the Bridgend Local Development Plan Key Stakeholder Forum was held on the 28th June 2007 in the Rafter's Room of Bridgend Rugby Club from 9.15am to 12.30pm. The purposes of the meeting were to:

- Update members regarding LDP preparation
- Update members of the Forum regarding the Wales Spatial Plan, its regional context and possible implications for Bridgend County Borough;
- Present members with, and discuss, the draft LDP Vision
- Present members with, and discuss, the five LDP Strategic Options for growth

The draft LDP Vision and Strategic Growth Options, were on Stakeholder consultation which ran from the 28th June – 10th August 2007.

In total, 49 delegates attended the Forum meeting; representing 30 organisations (see Appendix A).

The purpose of this report is to highlight the issues which were raised at the meeting. This report should be read in conjunction with the Council's Response to those representations received from stakeholders on the draft Vision and Strategic Options, which details individual comments made to the documents; the Council's response; and any proposed actions and changes to the documents.

2. The Regional Context: The Wales Spatial Plan and South East Wales Regional Housing Apportionment

The Forum meeting began with a presentation from the Council regarding: the Wales Spatial Plan, developments occurring at the regional level to develop a regional framework; and the housing apportionment exercise and Memorandum of Understanding which has been developed by the South East Wales Strategic Planning Group. A copy of the presentation can be found at Appendix B. Questions were invited on the contents of the presentation.

A question was asked on the status of brown field sites (particularly gardens and children's playing space). The Council responded by stating that brown field sites are those previously used and therefore it is generally accepted that it is more sustainable to re-use them. However, policies are in place to protect playing space and residential amenity. Even though there may be conflicts in this respect, the alternative is to develop on green field sites.

A question was raised regarding the amount of developable land available and that developers will want to develop easy sites first. The Council responded that section 106 agreements can change the economic balance of green field sites, making brown field sites more attractive. In policy terms, if less green field land is allocated; more development will be on brown field land.

The status of Candidate Sites was queried and particularly those put forward by the Council itself. The Council responded by stating that all developers will seek to maximise their land values via future allocation. As a landowner, the Local Authority (via the property department) also had to put sites forward. However, the planning and property functions of the Council are separate and the Council will act carefully, responsibly and appropriately in these situations.

The need for affordable housing across the County Borough was stressed as well as the need not to develop on bridleways and access points to the countryside. The Council responded that there are no proposals to build over rights of way and that draft Supplementary Planning Guidance (SPG) has just been published regarding affordable housing.

A query was raised regarding consulting mechanisms for those areas without representation at the meeting. The Council answered that all stakeholders were invited; however those not present will have the material circulated with a chance to respond during the consultation period.

The Council will circulate a delegate's pack to all members of the Stakeholder Forum which could not / did not attend the meeting.

3. Pre-Deposit LDP Participation and Consultation: The draft LDP Vision and draft Strategic Growth Options

The draft Vision

The Forum continued with a presentation from the Council regarding the draft LDP Vision and draft Strategic Options. A copy of the presentation can be found at Appendix C. Questions were invited on the contents of the presentation.

A question was raised whether the vision was for communities to travel to employment or to accommodate employment locally. The Council responded that the desire is to plan for both residential and employment uses together, however in reality developers cannot be easily controlled in this respect.

A query was raised regarding the sustainable merits of granting an application for an extension to the Rockwool Plant. The Council replied that the Rockwool Plant actually saves on carbon, providing insulation homes across Europe. The planning process does not require a carbon analysis to be conducted;

however, it is desirable to ensure developments have a low carbon footprint by developing policies with more teeth.

It was queried why roads were not being improved to accommodate extra traffic generation from allocated sites. The Council responded that all these factors are considered when allocating sites.

Questions were raised on balancing the need for industrial sites with rural land. The Council stated that the LDP will be critically driven by housing development, and that initial calculations suggested that there are enough industrial allocations.

A query was raised if the Council could buy affordable houses to subsequently rent out. The Council responded by stating that the Authority doesn't have a budget to actually buy houses.

MJH then reminded delegates that questions should be directed to him about more relevant LDP issues.

A query was raised regarding the process for removing and objecting to candidate sites. The Council stated that candidate sites can be withdrawn by the applicant and a consultation period will be open to the public to object to any in the future if, and when, they are allocated for a purpose.

The draft Strategic Growth Options

The Council stated that the Officers Working Group recommended the Trend Based Strategy as the preferred option on the 20th April 2007, and the Cross Cutting Policy Forum expressed a preference for the UDP Strategy on the 9th May 2007. However, on the 14th June 2007, the Council recommended that both the UDP Strategy and the Trend Based Strategy be put forward as the two preferred options for consideration at the Key Stakeholder Forum.

Members of the Cross Cutting Policy Forum stated that they chose the lower growth option on the 9th May 2007 due to fears that infrastructure would not support the higher growth option. It was reiterated that the purpose of this meeting was about stakeholders deciding on the preferred option.

Members of the Cross Cutting Policy Forum stated that the UDP Growth Strategy allowed for more flexibility with regard to infrastructure and schools, not just housing. The Cross Cutting Policy Forum has not changed its views, and although the UDP growth Strategy may seem to limit growth, once sites have been allocated and built with a higher growth option, there will be more pressure in four years time.

Members of the Cross Cutting Policy Forum raised concerns that the Trend Based strategy would lead to the need for more sites like Broadlands and additionally suggested that infrastructure should be addressed primarily, not houses.

It was stated that members of the Cross Cutting Policy forum did not have the extra information presented by the Council at this meeting. In response, it was stated the reason for the presentation was to deliver the extra information and that statutorily, the Council will have to be consistent with the Wales Spatial Plan to fulfil the tests of soundness.

It was queried how the Council ran the risk of not having regard to the Wales Spatial Plan if the UDP is in accord with it. It was explained that sustainability issues would be the problem, for example, if investment and jobs are planned for without housing, the amount of in-commuting will unsustainably increase.

The status of the South East Wales Spatial Plan was queried. The Council replied that it is not fully adopted, but the visions within it have been endorsed for consultation.

It was raised that the problems with economic growth in the valleys not been discussed. In response it was stated a lot of these issues require policy interventions, however these concerns are addressed in the Community Strategy. In addition, such concerns will be further addressed by the Council's

Regeneration Strategy and EU funding; however planning is more concerned with key drivers, primarily the level of housing. The Council also stated that the regeneration in the Ogmore Valley will be addressed in the near future.

Some stakeholders questioned how seriously their input is taken regarding what goes in the community. In response the stakeholders were assured that their observations are very important.

It was stated that Bridgend was one of the few authorities that adopted a UDP as recently as 2005. It was asked why it is necessary to re-evaluate the UDP so soon. In response the Council stated that the LDP follows on from the UDP, and that the Council are bound to produce a new plan by the Welsh Assembly Government.

Clarification was requested between Bridgend Town and Bridgend County Borough when talking about growth options and stressed the importance of drawing a distinction between the two. In response, the Council stated that a lot of towns and villages interact within Bridgend Town and despite the nostalgia of Bridgend being and remaining a small 'market town', there are real pressures from growth and the Wales Spatial Plan, as outlined, and this should be a vision of what Bridgend is to come.

It was queried if the only difference between the UDP and the LDP is a different 'spatial overview' for Bridgend to fit in. The Council responded by stating that developers are building out UDP allocations faster than they were made. Additionally there are two options; to either not allocate any more areas (resulting in price rises) or to address the real pressure for houses.

It was queried if the Council got the UDP wrong first time. In response the Council assured the stakeholders that the UDP hasn't gone wrong, rather the

building industry has brought forward the houses at higher build rates. Additionally, average household sizes are falling and the UDP calculations were done some time ago, hence the 5 year review cycle.

4. Sustainability Appraisal of the LDP Strategic Growth Options

A presentation (attached as Appendix D) was given by Baker Associates regarding the Sustainability Appraisal of the LDP Strategic Growth Options and invited questions.

Concerns were raised regarding the valley communities being 30-40 minutes travel from the proposed employment opportunities. In response it was stated that this meeting only concerned growth levels and not where the growth will be taking place.

In relation to the above further concerns were raised regarding jobs being filled by in-commuters and not by existing residents with little motivation to travel down from the valleys. In response it was stated that it is difficult attracting industry wants to the valley areas and additionally that the population has a problem with lack of skills. Stakeholders were reminded that the Council's Regeneration Strategy has to address these issues and that planning was concerned with land use allocations.

Concerns were raised regarding the SEAs figures and the issue of rising sea levels. The Council responded that it has to be mindful of these issues within the LDP and stressed the importance of avoiding areas of flood risk.

It was queried if tourist, commuter and economic development areas were to be sustainably appraised. In response it was stated that the appraisal will reflect all of the aforementioned areas at the time needed.

It was stated that roads and public transport to the valleys needs to be addressed. It was expressed that stakeholders needed to be convinced by the Trend Based strategy. In reply it was stated that transport is a real issue and the sustainability appraisal will consider these issues. The Council added that there are many variables in the process and that the Planning Department can only come down to the best assessment on current figures.

The Stakeholders were thanked for attending the meeting and were requested that responses on the preferred option be returned to the planning department by the 10th August 2007.

Appendix A – Delegates at LDP Key Stakeholder Forum – 28th June 2007

Present: -

Baker Associates	John Baker Cicely Postan
Bettws Communities First Partnership	Lynne Simmons
Blackmill Ward Communities First Partnership	Frances McShane
Bridgend Biodiversity Partnership	Nigel J Ajax Lewis
Bridgend County Borough Council (LDP Steering Group / Cross Cutting Policy Forum)	Cllr L Davies Cllr M Gregory Cllr P A Hacking (Chair) Cllr L Phillips Cllr J Radford Cllr John Spanswick Cllr W H Colin Teesdale Cllr K Watkins Cllr H Williams
Bridgend County Borough Council	Steve Bool Kathryn Carter Martin Hooker Stuart Ingram Hayley Landon Nick Lloyd Adam Provoost
Bridgend Environmental Partnership	Zoe Livermore
Bridgend Heritage Partnership	Neil Sumner
Bridgend Housing Partnership	Peter Green
Bridgend Local Access Forum	Cllr R M Granville
Bridgend Partnership Board	Rosemary Fletcher
Caerau Communities First Partnership	Eugene Dubens
Caerau Regeneration Forum	Aled Singleton
Cefn Cribwr Community Council	M J Beckett
Communities First Bridgend	Sue Whittaker
Cornelly Community Council	B L Rose
Countryside Council for Wales	Gill Barter
Coychurch Higher Community Council	Kenneth Russell
Coychurch Lower Community Council	Jack Reeves

Environment Agency Wales	Suzanne Waldron Bonnie Miles
Evanstown Communities First Partnership	Jason Williams
Ewenny Community Council	Helen Baker
Garw Valley Regeneration Forum	Delyth Samuel
Laleston Community Council	Kathryn Norman
Llangeinor Communities First Partnership	Paula Lunnon
Llangynwyd Middle Community Council	G Howells
Maesteg Town Council	Harry Fenney
Merthyr Mawr Community Council	Anne Morgan
Neath Port Talbot County Borough Council	Anne-Marie Hurley Rachael Jones
Pencoed Town Council	R Williams
Porthcawl Chamber of Trade	Paul Fielding
Vale of Glamorgan Council	Lucy Turner

Appendix B – The Regional Context: The Wales Spatial Plan and South East Wales Regional Housing Apportionment Presentation

BRIDGEND LDP STAKEHOLDER FORUM

28TH JUNE 2007



LDP PREPARATION TO DATE

- Delivery Agreement approved by WAG 6th November 2006
- Sustainability Appraisal (SA) Scoping Report approved by Council 28th December 2006.
- Candidate Sites – 402 sites in total and Candidate Sites Register prepared.



Strategic Development(SE Wales)
Wales Spatial Plan

Purpose

- To report current position
- To inform future strategic development options in the LDP



South East - The Capital Network

Vision:

'An innovative skilled area offering a high quality of life - international yet distinctively Welsh. It will compete internationally by increasing its global visibility through stronger links between the Valleys and the coast and with the UK and Europe, helping to spread prosperity within the area and benefiting other parts of Wales.'

Key Deliverables

- the role and function of settlements
- definition of strategic sites for the area
- areas where strategic development is required
- strategic actions required to enable South East Wales to function as a networked city region.

PRODUCT - AN AREA DEVELOPMENT FRAMEWORK INFORMING ISSUES FOR COLLABORATION TO DELIVER THE CITY REGION AND LOCAL PLANNING TO SUPPORT THIS

WHAT MAKES A SUCCESSFUL CITY REGION?

- Working City Region
- Learning City Region
- Connected City Region
- Living City Region
- Lively City Region
- Sustainable City Region
- Well Governed City Region



LEARNING FROM ELSEWHERE

Planning land use and transportation together to reduce commuting by locating housing near jobs and services;
Limiting investment in new roads and redirecting transportation investments to rapid transit and improving walking and biking environments;
Re-developing "brownfield" industrial lands and increasing densities in existing neighbourhoods to stimulate urban growth;
Maintaining a stock of affordable housing by incorporating a range of housing types and prices as a requirement of new developments;
Paying attention to the coordinated provision of physical infrastructure, social and community services by requiring new services as a condition of development approvals;
Involving the public in developing and implementing city and community plans; and
Establishing partnerships with community groups, business, non-profit organisations, and other governments to design and implement plans.

OPTIONS TO DELIVER THE CITY REGION

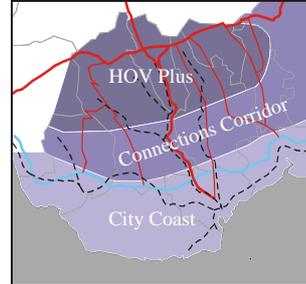
1. ECONOMIC CORRIDOR GROWTH
2. NETWORKED BALANCED COMMUNITIES
3. INDEPENDENT DEVELOPMENT

But all must recognise Cardiff's dominant role in the City region

HYBRID OPTION

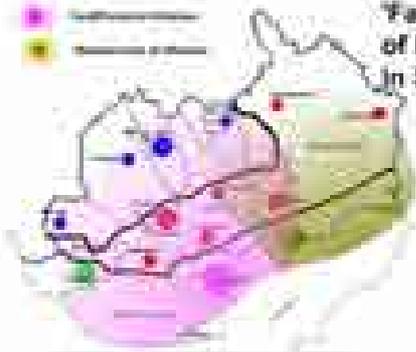
An Innovative, Competitive Cardiff in a strong and sustainable city region

Networked City Region



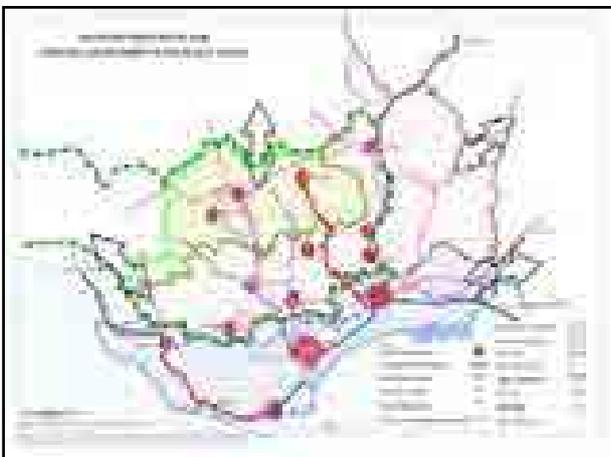
- City Coast
- HOV Plus
- Connections Corridor

'Fans' of Prosperity in S.E. Wales



Key settlements

- Aberdare
- Abergavenny
- Barry
- Blackwood
- **Bridgend**
- Caerphilly
- Chepstow
- Cardiff
- Cwmbran/Pontypool
- Ebbw Vale
- Llantrisant
- Merthyr Tydfil
- Newport
- Pontypridd



Wales Spatial Plan-Southeast Wales



Wales Spatial Plan-Southeast Wales

Bridgend has been identified as one of the key or hub settlements in Southeast Wales. These are

“...places which provide a focus for economic clustering both now and in the future. Where services are provided which meet the needs of residents, where cultural and leisure facilities provide enjoyment and an enhanced quality of life and places centred on a movement framework that provides people with a range and choice of transportation options, including high quality reliable public transport....”

Wales Spatial Plan- Southeast Wales

The relationship of these hub settlements to the success of the region as a whole is matched by their role as catalysts to the further regeneration of their surrounding settlements.

Wales Spatial Plan- Southeast Wales

Bridgend is classified as a major district centre, with opportunities and constraints similar to, if on a smaller scale, to those of Cardiff and Newport – economic growth potential, tempered by the need to avoid traffic overload. It is classed as an important manufacturing and service town, it also has a range of leisure and retail attractions which draw from a large catchment.

Wales Spatial Plan- Southeast Wales

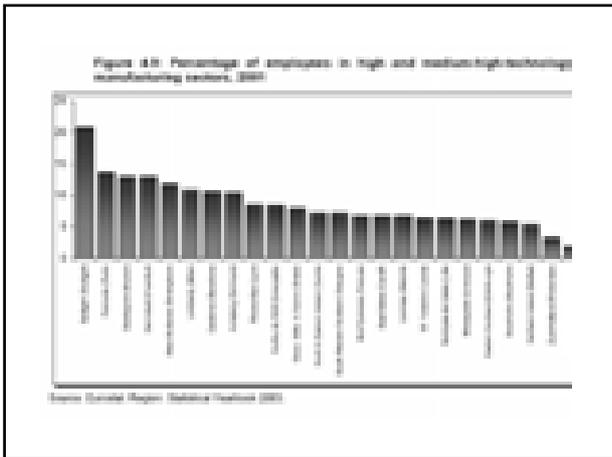
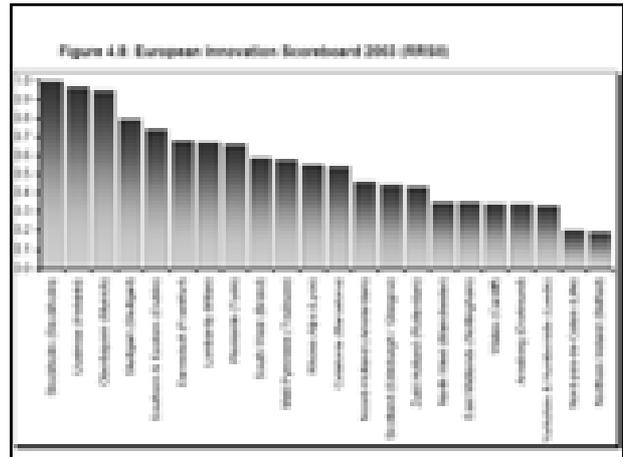
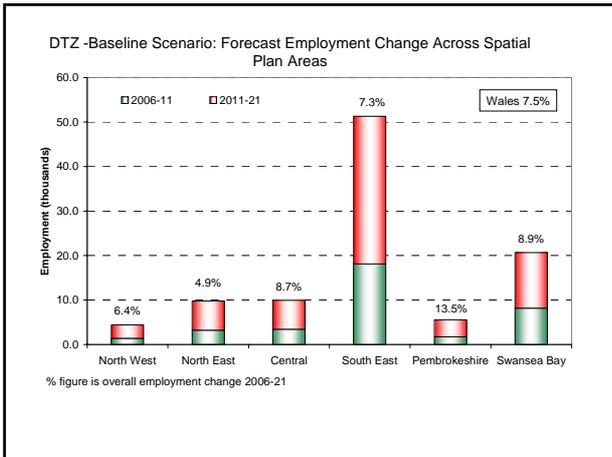
The town should be aiming to perform a far greater sub regional role, with diversification of employment a key issue, and future reinforcement of the Town Centre. Bridgend also has an important role as a major district service centre for the deprived former mining communities to the north. The transport links between Bridgend and its valley satellite settlements are therefore an important consideration. Bridgend can be viewed as a hinge point, connecting all three sub-regions, with an important role to play in each.

Wales Spatial Plan-Southeast Wales



Employment

- Recognise Cardiff/Coasts contribution to job growth and forecasts
- Grow higher value employment structure
- Move more public sector out into sub region
- Realise HE opportunity
- Make Heads of the Valleys strategy a reality
- Tackle economic inactivity



Transport

- More effective management of the existing network
- Invest in public transport to link key settlements
- Link transport directly to job creation
- Grow employment/housing around transport nodes
- Secure strategic contribution of M4 by avoiding need for local congestion

Housing

- Consensus on initial allocations for 108k households
- Allocations by housing market area
- Affordable housing challenge
- Brownfield not greenfield
- Cardiff, Newport and the Valleys major growth points

Environment

- Perception changing
- Constraints – e.g. sewerage/utilities
- Low carbon region
- Networked environment region

Other areas of opportunity

- Health
- Culture including Sport
- Skills
- Sustainability
- Social Justice
- Governance and participation

Strategic proposals

- Transport Investment
- Inactivity programme
- ICT development strategy
- Sectoral and basic skills programme
- Knowledge economy projects
- Settlement development/regeneration schemes on transport corridors

Swansea Bay and Western Valleys

Vision:

"An area of planned sustainable growth and environmental improvement, realising its potential, supported by integrated transport within the area and externally and spreading prosperity to support the revitalisation of West Wales."

Key Deliverables Swansea Bay and Western Valleys

- The main elements of the WSP strategy for this area are:
- Development of a modern, attractive and vibrant waterfront urban area;
- Revitalisation of Swansea as Wales' second national city; and
- Enhanced transport links between inland communities and the coast.

Wales Spatial Plan - Swansea Bay



Wales Spatial Plan- Swansea Bay

The settlements of Maesteg and Porthcawl/Pyle, are seen as second tier 'key settlements' within the Swansea Bay WSP area

In this respect, Maesteg is considered to be "a significant local retail and employment centre", with brownfield land development opportunities.

Porthcawl/Pyle is acknowledged as being an important residential area.

Porthcawl itself is a main seaside tourist destination providing accommodation, leisure and entertainment facilities to match, is an important future tourist, retail, employment and housing area, and is included in the Swansea Bay Waterfront development area.

NEXT STEPS

- Completion and validation of draft frameworks including wider context
- Stakeholder Consultation on preferred options and frameworks
- Draft Area Development frameworks
- Public consultation post Summer 2007

SOUTH EAST WALES REGIONAL HOUSING APPORTIONMENT



BACKGROUND

- WAG issued draft Ministerial Interim Planning Policy Statement (MIPPS).
- South East Wales Strategic Planning Group (SEWSPG) undertook work and agreed WAG's household projections for 2021.
- WAG approved MIPPS on housing June 2006 and released statement saying that LPA's should work collaboratively on Policy-based housing projections.
- SEWSPG produced South East Wales Housing Apportionment Memorandum of Understanding which has been accepted by Council on the 25th April 2007 as a working hypothesis for ongoing work in respect of detailed housing figures for the Bridgend Local Development Plan.

SEWSPG: Dwelling Completions by LA to 2021

A table with four columns: 'LA', '2006-2011', '2011-2016', and '2016-2021'. The rows list various Local Authorities (LAs) in South East Wales, including Bridgend, Gwent, Newport, and others. The table contains numerical data representing dwelling completions for each LA across the specified time periods. The text is small and difficult to read, but the structure is clear.

Questions?

Appendix C – Pre-Deposit LDP Participation and Consultation: The draft LDP Vision and draft Strategic Growth Options

STRATEGIC VISION



LDP VISION (LDP Wales)

“The LDP should address the unique economic, environmental and social characteristics, opportunities and issues of the area. It should be based on a vision of the future which should be clear, realistic and based on the objectives and priorities of the relevant community strategy”.

LDP VISION (Community Strategy)

- The mission statement of the Community Strategy is:

To show the county borough's natural features and resources to the residents and independent users to the full.

- The Aims and Objectives are to:
 - Improve quality of life for all
 - protect and enhance our environment
 - Increase prosperity
 - Have safer communities
 - Achieve a healthier County Borough
 - Have a more inclusive County Borough

LDP VISION (Corporate Improvement Plan)

The Corporate Improvement Plan sets out how the Council will work to deliver the aims and objectives of the Community Strategy, and has developed a set of thematic priorities which are:

- Creating Learning Communities
- Children Today, Adults Tomorrow
- Realising the Potential of our Major Towns
- Valuing our Valleys
- Caring for Our Future
- Diverse and Sustainable Economy
- Supporting our Disadvantaged Communities

DRAFT LDP VISION (LDP)

- The Draft Vision Statement for the emerging LDP is:

“To improve the quality of life for all people living, working and relaxing in Bridgend County Borough by protecting and enhancing the environment and increasing prosperity whilst promoting safe, healthy, sustainable, and inclusive communities”.

STRATEGIC GROWTH OPTIONS



STRATEGIC GROWTH OPTIONS

- Estimating future population growth is important as it will have major influence on future land requirements.
- Housing development principal consumer of land.
- Estimates produced by Chelmer Population & Housing Model.
- Based on 2001 census data & includes 2003 local correction factors.
- Model run for 5 strategic growth options, inputting known building completions for 2001 - 2006 and anticipated building programmes from 2006 – 2021.
- The 5 strategies are as follows:

STRATEGIC GROWTH OPTIONS

- Do Nothing Strategy
- UDP Growth Strategy
- Trend Based Growth Strategy
- High Growth Strategy
- Very high Growth Strategy

STRATEGIC GROWTH OPTIONS

- All sites allocated in the existing UDP are expected to be developed and there is an anticipated contribution from small-scale and windfall housing sites.
- Implicit commitment in each of the strategies of 6930 dwellings, the basis of the Do Nothing Strategy.
- The results are as follows...

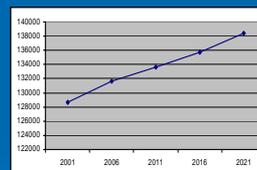
STRATEGIC GROWTH OPTIONS

Strategy	Assumed Annual Build Rate	Additional Dwelling Requirement	2021 Population
1. Do Nothing Strategy	462	0	138,432
2. UDP Growth Strategy	468	60	139,800
3. Trend Based Growth Strategy	640	1,770	141,370
4. High Growth Strategy	648	2,760	143,488
5. Very High Growth Strategy	702	3,860	147,534

EMPLOYMENT LAND AVAILABILITY

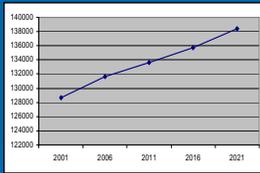
- Currently exists a substantial landbank of 227 hectares.
- Taking into account past take-up rates, increases in population, increases in economic activity etc. This represents more than sufficient employment land up to 2021.
- Availability of employment land is not a constraining factor for any of the Strategic Growth Options.

DO NOTHING STRATEGY



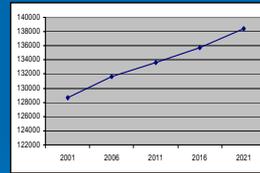
- Assumes build out of existing UDP commitments and small-scale and windfall contributions.
- No further allocations.
- Dwelling requirement of 6930 up to 2021.
- Annual Build rate of 462 dwellings
- Resultant population = 138,432.
- Current net migration reduced by about one third
- Required in application of SEA.

DO NOTHING STRATEGY (Advantages)



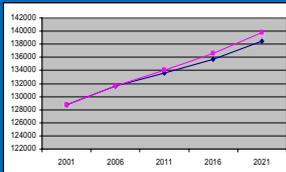
- No further allocations of land required.
- Less pressure on 'protected land'.
- Increased public certainty.
- No cherry picking of easily developed sites/existing harder to develop sites may be brought forward.
- Less pressure on public services and infrastructure.

DO NOTHING STRATEGY (Disadvantages)



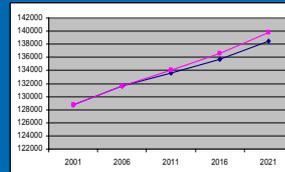
- Does not accord with regional growth aspirations.
- Limited opportunity for public benefits available with new allocations (i.e. affordable housing).
- At odds with market forces.
- Possible re-assessment of small and windfall sites.
- Bridgend's growth may fall behind other centres affecting inward investment and retail service provision.
- Affordability reduced with increasing house prices.
- Increased net inward commuting due to decline in economically active population.
- Decline in economically active population may not support existing community facilities.

UDP GROWTH STRATEGY



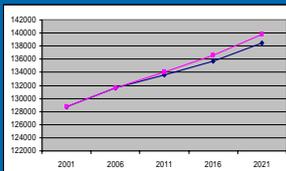
- Anticipates continuation of existing UDP strategy to 2021 (annual build rate of 498 dwellings per annum)
- Requirement of 7,470 dwellings between 2006 and 2021.
- Resultant population = 139,800
- Current net migration reduced by about a quarter
- Requires a further 540 dwellings in addition to 'Do Nothing' dwelling requirement.

UDP GROWTH STRATEGY (Advantages)



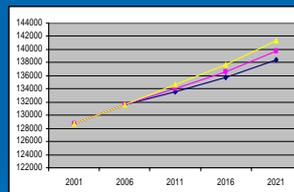
- Reinstatement of approved growth strategy
- Additional dwellings could be accommodated on existing allocations subject to greater housing densities.
- Less pressure on 'protected land'.
- Public certainty by reinstating UDP rates.
- No cherry picking of easily developed sites/existing harder to develop sites may be brought forward.
- More sustainable, realistic and achievable rate of development cf. to Do Nothing
- In line with regional housing growth apportionment (SEWSPG).

UDP GROWTH STRATEGY (Disadvantages)



- May not accord with WSP growth aspirations.
- Limited opportunity for public benefits available with new allocations (i.e. affordable housing).
- Affordability reduced with increasing house prices
- Increased net inward commuting due to decline in economically active population
- Decline in economically active population may not support existing community facilities.

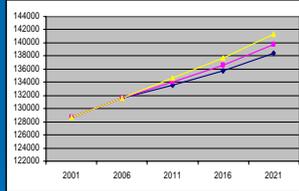
TREND BASED GROWTH STRATEGY



- Produced using average annual dwelling completions in BCBC since 1991 (540 per annum).
- Requirement of 8100 dwellings up to 2021.
- Resultant population = 141,378
- Current net migration reduced by one tenth
- Requires a further 1170 dwellings in addition to 'Do Nothing' dwelling requirement.

TREND BASED GROWTH STRATEGY

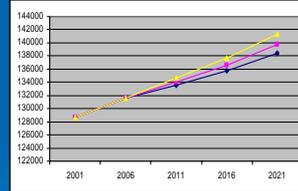
(Advantages)



- Takes account of economic cycles.
- Information is robust given the time period.
- Additional dwellings accommodated on existing allocations using higher densities and follows same tested methodology as the UDP.
- Possibility of accommodating additional dwellings on brownfield land.
- Less pressure on 'protected land'.
- Limited cherry picking on easily developed sites.
- Based on up-to-date build rates so more realistic.
- Accommodates SEWSPG apportionment rates and more in line with WSP growth aspirations.

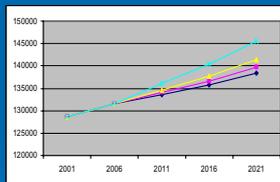
TREND BASED GROWTH STRATEGY

(Disadvantages)



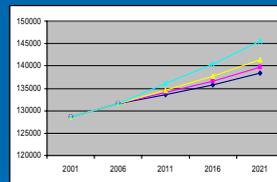
- More difficult to develop sites may not be brought forward.
- Limited opportunity for benefits made available with new allocations (i.e. affordable housing) due to possible constraints associated with brownfield sites.

HIGH GROWTH STRATEGY



- Anticipates 20% increase in build rate from Trend Based Strategy.
- 648 dwellings per annum.
- Dwelling requirement of 9720 up to 2021.
- Resultant population = 145,489.
- Current net migration increased by a quarter
- Requires a further 2790 dwellings in addition to 'Do Nothing' dwelling requirement.

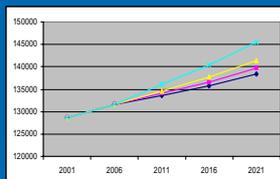
HIGH GROWTH STRATEGY (Advantages)



- Some additional dwellings accommodated on existing allocations using higher densities.
- Some additional dwellings could be accommodated on brownfield land.
- Scope for additional community benefits and facilities from new sites.
- Accelerated growth will have positive effects on inward investment and retail and service provision.
- May accord with WSP growth aspirations.
- More in line with economic growth aspirations.

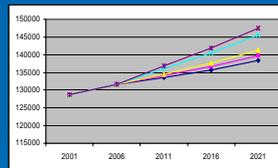
HIGH GROWTH STRATEGY

(Disadvantages)



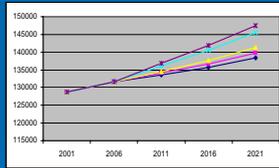
- Exceeds agreed SEWSPG housing apportionment figures.
- May require allocation of Greenfield sites.
- Existing protected areas could be affected.
- 'Cherry picking' of new easily developed sites/difficult to develop sites may not be brought forward.
- This level of development has only been achieved in 3 of the past 16 years.
- Possible pressure on existing physical infrastructure resulting from accelerated growth.

VERY HIGH GROWTH STRATEGY



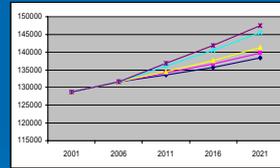
- Anticipates 30% increase in build rate from Trend Based Strategy.
- 702 dwellings per annum.
- Dwelling requirement of 10,530 up to 2021.
- Resultant population = 147,534.
- Current net migration increased by half
- Requires a further 3600 dwellings in addition to 'Do Nothing' dwelling requirement.

VERY HIGH GROWTH STRATEGY (Advantages)



- Some additional dwellings accommodated on existing allocations using higher densities.
- Some additional dwellings possibly accommodated on brownfield land.
- Scope for additional community benefits and facilities from new sites.
- Accelerated growth will have positive effects on inward investment and retail and service provision.

VERY HIGH GROWTH STRATEGY (Disadvantages)



- Significantly exceeds agreed SEWSPG apportionment figures and may exceed WSP growth aspirations.
- Will require allocation of Greenfield sites.
- Existing protected areas will be affected.
- 'Cherry picking' of new easily developed sites/difficult to develop sites may not be brought forward.
- This level of development has never before been achieved.
- Further additional pressure on existing infrastructure.
- Could encourage further net out commuting creating dormitory settlements.

PREFERRED STRATEGIC GROWTH OPTION?

The Preferred Strategic Growth Option needs to satisfy the Tests Of Soundness which will be applied the whole of the LDP process

LOCAL DEVELOPMENT PLAN (LDP) WALES: Policy on preparation of LDP's

Page 27 states:

"The presumption will be that the LDP is sound unless it is shown to be otherwise as a result of evidence considered throughout the examination. There are 10 criteria for assessing soundness which fall into three categories. They are..."

LOCAL DEVELOPMENT PLAN (LDP) WALES

Procedural tests:

P1: It has been prepared in accordance with the Delivery Agreement including the Community Involvement Scheme.

P2: The plan and its policies have been subject to sustainability appraisal including strategic environmental assessment

LOCAL DEVELOPMENT PLAN (LDP) WALES

Consistency Tests:

C1: It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas

C2: It has regard to national policy

C3: It has regard to the Wales Spatial Plan

C4: It has regard to the relevant community strategy/ies

LOCAL DEVELOPMENT PLAN (LDP) WALES

Coherence & Effectiveness Tests:

CE1: The plan sets out a coherent strategy from which its policies and allocations logically flow and, where cross-boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities

CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

CE3: There are clear mechanisms for implementation and monitoring

CE4: It is reasonably flexible to enable it to deal with changing circumstances

PREFERRED OPTION?

After considering all of the growth options against all the tests of soundness illustrated above, the Officer Working Group consider the "Trend-Based" Growth Option to be the 'Preferred Option' to follow.

PREFERRED OPTION?

The Cross Cutting Policy Forum expressed a preference for less growth and decided to endorse the UDP Growth Option i.e. the reinstatement of the growth strategy adopted in the UDP.

PREFERRED OPTION?

The Council at its meeting of 14th June considered that the UDP Growth Option and the Trend Based Growth Option both had their merits.

They recommended that both options be put forward to the Stakeholder Forum as possible preferred options.

UDP Growth Option

Significant risk that adopting the UDP Growth option would mean that the LDP would fail one of the Consistency Tests of soundness:

C3: It must have regard to the Wales Spatial Plan

Wales Spatial Plan-Southeast Wales



Wales Spatial Plan-Southeast Wales

Bridgend has been identified as one of the key or hub settlements in Southeast Wales. These are

“...places which provide a focus for economic clustering both now and in the future. Where services are provided which meet the needs of residents, where cultural and leisure facilities provide enjoyment and an enhanced quality of life and places centred on a movement framework that provides people with a range and choice of transportation options, including high quality reliable public transport....”

Wales Spatial Plan- Southeast Wales

The relationship of these hub settlements to the success of the region as a whole is matched by their role as catalysts to the further regeneration of their surrounding settlements.

Wales Spatial Plan- Southeast Wales

Bridgend is classified as a major district centre, with opportunities and constraints similar to, if on a smaller scale, to those of Cardiff and Newport – economic growth potential, tempered by the need to avoid traffic overload. It is classed as an important manufacturing and service town, it also has a range of leisure and retail attractions which draw from a large catchment.

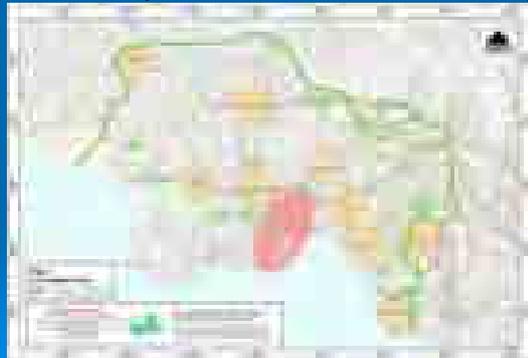
Wales Spatial Plan- Southeast Wales

The town should be aiming to perform a far greater sub regional role, with diversification of employment a key issue, and future reinforcement of the Town Centre. Bridgend also has an important role as a major district service centre for the deprived former mining communities to the north. The transport links between Bridgend and its valley satellite settlements are therefore an important consideration. Bridgend can be viewed as a hinge point, connecting all three sub-regions, with an important role to play in each.

Wales Spatial Plan-Southeast Wales



Wales Spatial Plan - Swansea Bay



Wales Spatial Plan- Swansea Bay

The settlements of Maesteg and Porthcawl/Pyle, are seen as second tier 'key settlements' within the Swansea Bay WSP area

In this respect, Maesteg is considered to be "a significant local retail and employment centre", with brownfield land development opportunities.

Porthcawl/Pyle is acknowledged as being an important residential area.

Porthcawl itself is a main seaside tourist destination providing accommodation, leisure and entertainment facilities to match, is an important future tourist, retail, employment and housing area, and is included in the Swansea Bay Waterfront development area.

UDP Growth Option

If so there is also a risk that the LDP might additionally fail one or more of the Coherence and Effectiveness Tests, particularly :

CE1: The plan sets out a coherent strategy from which its policies and allocations logically flow and, where cross-boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities

CE2: The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives and are founded on a robust evidence base

CE4: It is reasonably flexible to enable it to deal with changing circumstances

PREFERRED OPTION?

The emerging regional and sub-regional strategies have a direct bearing on Council's choice of a Preferred Strategic Growth Option for the LDP, as regard must be had to the Wales Spatial Plan in all matters related to Development Plan preparation.

The clear message coming from the emerging WSP area strategies is that the Bridgend C B area has a significant future role to play in the development of South Wales as a whole, and that it may be at risk of not fulfilling its true potential.

PREFERRED OPTION?

In this context, the Trend-Based growth option favoured by the LDP Officer Working Group is much closer to the aspirational role for Bridgend CB currently emerging from both WSP area strategies, than is the UDP growth option favoured by the Cross Cutting Policy Forum.

NEXT STEPS

- Feedback from Key Stakeholder Forum meeting and written responses by 10th August 2007 will be reported back to Council and used to inform the Preferred LDP Strategy.
- A preferred LDP Strategy together with its spatial implications will be agreed in the Pre-Deposit Proposals for statutory consultation in the Autumn.
- Another Key Stakeholder Forum meeting as part of this consultation exercise will be convened in the Autumn.

Questions?

Appendix D – Sustainability Appraisal of the LDP Strategic Growth Options Presentation

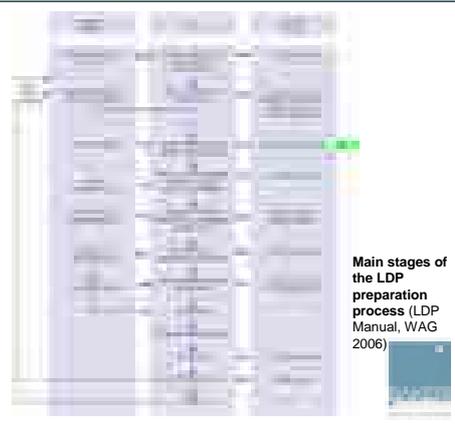
Sustainability Appraisal of the Housing Growth Options for Bridgend County Borough LDP



Stages of LDP Preparation and SA/SEA Process

The SA/SEA of growth options is part of the appraisal of strategic options of the LDP.

Next stages of SA/SEA will be appraisal of the emerging options for the preferred strategy.



Main stages of the LDP preparation process (LDP Manual, WAG 2006)

The SA/SEA Process

- this stage of the SA/SEA builds on work already completed at the Scoping Stage
- the Sustainability Objectives developed at Scoping and agreed through consultation are the basis of the SEA/SA of the growth options
- the options have been tested against the four main themes of sustainable development



Four main sustainable development themes

- social progress that recognises the needs of everyone
- effective protection of the environment
- prudent use of natural resources
- maintenance of stable levels of economic growth and employment



In setting the growth option it is vital to identify the correct level of growth in order to implement a sustainable spatial strategy for development in Bridgend County Borough



Over estimating growth needs: leading to over-allocation of land, resulting in developers 'cherry picking' sites with more desirable sites developed first to the detriment of areas in need of regeneration and securing the efficient use of land.

Under estimating growth needs: leading to under-allocation of housing land resulting in the ad-hoc release of land to meet demand, which would be out of keeping with a planned sustainable spatial strategy.



Summary of the likely sustainability implications of differing levels of housing growth



The economy:

Low: possible implications for economic growth, due to lack of workforce

Medium: supporting a balanced provision of housing and economic growth to support a more self-contained BCB

High: supporting a high growth economy to the benefit of BCB and the wider region



Travel, air quality and accessibility (1):

Low:

- housing sites are established with no potential for new allocations near to areas of need, possibly leading to poor access and the need to travel by car
- low housing levels and a growing economy many lead to an increasing need to travel long distances to work by car



Travel, air quality and accessibility (2):

Medium:

- additional housing allocations can be located in more accessible areas
- matched housing and employment growth will help to reduce gross levels of commuting



Travel, air quality and accessibility (3):

High:

- additional housing allocations may be able to support a mix of uses including employment, reducing the distance/need to travel
- rapid housing growth and low economic growth leading to an increase in gross commuting levels



Community and housing:

Low: lack of affordable housing in parts of BCB, potentially pushing local people out of the area changing the character of communities

Medium: better provision of homes throughout BCB

High: where housing growth outstrips economic growth more people will live in BCB but work elsewhere. Leading to commuter towns and villages lacking cohesive community character



Land use:

Low: all housing development will be on sites already allocated or with planning permission, much of which is previously developed

Medium: there is sufficient previously developed land to accommodate additional homes

High: likely to require additional greenfield sites



Natural resources:

- use of natural resources e.g. energy, materials and water will increase from low to high housing growth. This will be in construction and the lifetime use of new homes



Sustainability issues for the emerging LDP

Strategy:

- defining the roles and relationships between towns and villages to identify growth needs and promote greater self-containment
- locating new development so as to reduce the need to travel by providing equitable access local jobs and services
- using land efficiently by allocating previously developed sites and setting minimum development densities



Sustainability issues for the emerging LDP

Policies: e.g.

- efficient use of natural resources in development, including on-site micro-generation
- mitigation and adaptation to climate change
- environmental protection including landscape and biodiversity
- promoting high quality design and layout of development
- protection of employment land



Appendix 2

Responses to Vision and Strategic Options Key Stakeholder Consultation

Response from Environment Agency Wales to Strategic Growth Option Consultation

Environmental Information and draft Priority Issues Package for Bridgend

Consultation Questions

Section 2

- Do you agree with the draft Vision?
- Do you think it adequately incorporates the objectives of the Community Strategy?

Section 3

- Do you consider any of the options to be unrealistic?
- If so, for what reasons?

Section 4

- Are there any omissions to the 'advantages' and 'disadvantages' identified for each of the Strategic Options?

Section 5

- Which of the options do you consider contributes most to achieving the draft LDP Vision and emerging aspirations of the Wales Spatial Plan?

Section 6

- What is your Preferred option?

Bridgend Local Development Plan

Vision & Strategic Options

Brackla Community Council

Mrs Jayne

Jowett

34 V 1

SectionNo	Stakeholders Response	Councils Response
General Comment	Request that BCBC ensures that a plan is in place to ensure that the infrastructure is sufficient to accommodate the extra housing.	<p>Noted</p> <p>The points raised in this response relate to matters of detail which will be dealt with in the deposit LDP.</p> <p>The Council will ensure, through conditions and legal agreements referenced in the LDP, that the infrastructure is in place to accommodate new developments.</p>

Bridgend Local Development Plan

Vision & Strategic Options

Merthyr Mawr Community Council

Mrs Anne

McAllister

46 V 1

SectionNo	Stakeholders Response	Councils Response
Section 2	Yes - The Council agrees with the draft vision. We believe that it does adequately accord with the objectives of the Community Strategy.	Agreement of the Vision is noted and welcomed.
Section 3	We consider the 'Do Nothing' Growth Option to be unrealistic in terms of the need for economic and housing growth within the Borough.	Noted
Section 4	There is an omission on 'Trend Based Growth Strategy' - Disadvantages should include - "It will create additional pressure on community facilities and road use which may not be met. Current UDP growth requirements in the county borough indicate that at the present time, these additional pressures require attention.	Disagree. Whilst it is acknowledged that this growth option may place limited additional pressure on community facilities and transportation, the rate of growth envisaged will not cause it to be a significant disadvantage to this option. The Council will ensure, through conditions and legal agreements referenced in the LDP, that the infrastructure is in place to accommodate new developments
Section 6	UDP Growth Strategy.	Noted

Bridgend Local Development Plan

Vision & Strategic Options

Neath Port Talbot County Borough Council

Mr G A I

Jenkins

59 V 1

SectionNo	Stakeholders Response	Councils Response
Section 2	a) Yes b) Yes	Agreement of the Vision is noted and welcomed.
Section 3	High Growth - Never had that level of growth in county.	Noted
Section 4	No	Noted
Section 5	Trend - Based Option	Noted
Section 6	Trend based option	Noted

Bridgend Local Development Plan

Vision & Strategic Options

Environment Agency Wales

Mr Phil

Coombe

61 V 1

SectionNo	Stakeholders Response	Councils Response
Section 2	We agree with the Draft Vision.	Agreement of the Vision is noted and welcomed.
Section 3	We believe that the options below are unrealistic. 1. Do Nothing Strategy 4. High Growth Strategy 5. Very High Growth Strategy	Noted
Section 5	Either Option 2 : UDP Growth Strategy or Option 3 - Trend Based Growth Strategy	Noted

Bridgend Local Development Plan

Vision & Strategic Options

Section 6

We feel it inappropriate to direct the Local Planning Authority as to its choice of preferred option; however, we would like to pass on some environmental information which should aid you in your decision. As such, we have consulted with our internal departments to gauge what affects the two predicted growth patterns will have and what factors may constrain them.

I have enclosed a copy of the Priority Issues Package for Bridgend, which although still in draft form, may help form a baseline for environmental information. Below is a summary of the key information we have gathered.

Issue No. 1 - Foul Drainage

Lack of sewerage capacity can threaten fresh water ecosystems and natural habitats. Sub-catchments where significant pressures have been identified are Caerau, Maesteg, Bettws and Sarn.

Issue No. 15 - Flood Risk

Approximately 21 km squared of the County Borough (8% of 255 km squared) is in the floodplain. In Bridgend County Borough there are already 9,000 properties within the floodplain. With regard to new residential developments we would refer you to the Welsh Assembly Governments development advice maps and TAN 15 Development and Flood Risk. Highly vulnerable developments such as residential should not be permitted within floodplains. Thus, 21 km squared should be withdrawn from any available land assessments. This in turn could have a knock on effect to the housing land bank.

Water Resources

Our assessment shows the Tywi resource zone should accommodate either of the proposed growth strategies (UDP Growth or Trend Based Growth). However, we can only comment on the potential impacts of the predicted growth on strategic water resources. There could be more localised capacity constraints in the existing water distribution system; additional information can be sort from Dwr Cymru Cyf. We have received quite a bit of detail from our internal consultation, which you may find useful; I have attached a copy under Appendix 1.

I hope the information provided helps you come to a decision of a preferred Strategic Growth Option.

APPENDIX 1

Bridgend falls within the Tywi resource zone. This is a large resource zone that also covers Swansea and Neath Port Talbot, a large area of Carmarthenshire and parts of another four local authorities. We can only

[Additional information to inform the LDP growth option considerations is noted and welcomed.](#)

[The Council will consider this information from the Environment Agency Wales in reaching a decision on Preferred LDP Growth Option.](#)

Bridgend Local Development Plan

Vision & Strategic Options

provide information on public water supply at a strategic level therefore Dwr Cymru Welsh Water should be consulted to obtain more local information on availability of water resources and infrastructure.

Our household growth and public water supply report (2007) assessed the impact of the household growth projections published by the Welsh Assembly Government (WAG) in 2006 on public water supply in Wales. We apportioned WAG's household growth projections for four regional groupings in Wales to water resource zones based on population. Bridgend accounts for about 9% of the population in the South East regional group. 9% of the household projections for South East regional group between 2006 -16 is only 5,600 which is lower than either of the two proposed strategies of 7,470 or 8,100.

One of the scenarios we assessed was WAG's household growth + 30%, which would bring the household projection for Bridgend up to 7,280 between 2006-16.

Last year, the assumed dwelling requirement for Bridgend was 7,500, but this was between 2006-21. 9% of SE regional group household projections between 2006-21 is 8,073.

Our assessment of the Tywi resource zone shows that even under WAG's household growth + 30% scenario there is still a surplus by 2020-21 in this zone based on current water company water resources plans.

Our assessment shows the Tywi resource zone should accommodate either of the proposed growth strategies for Bridgend. Companies will publish draft new plans in 2008. Changes in the companies' assessment of supply and demand may change our conclusions set out in our initial assessment.

Our report only considered the potential impacts of growth in demand on strategic water resources. We did not consider more localised capacity constraints in the existing water distribution system of water companies.

Bridgend County Borough Council needs to talk to DCWW to obtain local information on the availability of water resources and infrastructure. This will avoid delays to plans and reduce their impact on the environment.

There are significant uncertainties in household growth and the effects of climate change on water resources. Using water wisely will help us cope with these uncertainties. We recommend Bridgend's LDP should encourage water efficient development.

Bridgend Local Development Plan

Vision & Strategic Options

General Comment

The Environment Agency Wales' full response is included at the end of this Appendix.

Bridgend Local Development Plan

Vision & Strategic Options

Blackmill & Glynogwr Tenants & Residents Association

Mrs M

Jenkins

660 V 1

SectionNo	Stakeholders Response	Councils Response
Section 2	<p>The four Associations named in Section 1 are not professional in these issues but are concerned that their views are listened to. Villages have special issues such as community facilities when housing is being considered.</p> <p>Elderly housing is an important issue. Social housing must also be included.</p> <p>Local public meetings must be held with local groups having representation that they choose.</p> <p>Some meetings should be held in the evening to accommodate working people who are interested in their communities.</p>	<p>The points raised in this response relate to matters of detail which will be dealt with in the deposit LDP.</p> <p>The Council will ensure, through conditions and legal agreements referenced in the LDP, that the infrastructure is in place to accommodate new developments.</p> <p>The LDP Delivery Agreement facilitates local public meetings as part of the deposit LDP consultation process. It is envisaged that these meetings will take place in the evening.</p>
General Comment		<p>THIS RESPONSE IS NOT FROM A LDP KEY STAKEHOLDER FORUM MEMBER</p> <p>THE RESPONSE WAS SOLICITED BY COMMUNITIES FIRST PARTNERSHIP - BLACKMILL WHO CONSULTED THEIR OWN MEMBERS</p>

Bridgend Local Development Plan

Vision & Strategic Options

Blackmill Youth & Community Centre

Mrs M

Jenkins

661 V 1

SectionNo	Stakeholders Response	Councils Response
Section 2	<p>The Four Associations named in Section 1 are not professional in these issues but are concerned that their views are listened to. Villages have special issues such as community facilities when housing is being considered.</p> <p>Elderly housing is an important issue.</p> <p>Social housing must also be included.</p> <p>Local public meetings must be held with local groups having representation that they choose.</p> <p>Some meetings should be held in the evening to accommodate working people who are interested in their communities.</p>	<p>The points raised in this response relate to matters of detail which will be dealt with in the deposit LDP.</p> <p>The Council will ensure, through conditions and legal agreements referenced in the LDP, that the infrastructure is in place to accommodate new developments.</p> <p>The LDP Delivery Agreement facilitates local public meetings as part of the deposit LDP consultation process. It is envisaged that these meetings will take place in the evening.</p>
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Bridgend Local Development Plan

Vision & Strategic Options

Blackmill Ladies Club

Mrs M

Jenkins

662 V 1

SectionNo	Stakeholders Response	Councils Response
Section 2	<p>The four associations named in Section 1 are not professional in these issues but are concerned that their views are listened to. Villages have special issues such as community facilities when housing is being considered.</p> <p>Elderly housing is an important issue. Social housing must also be included.</p> <p>Local public meetings must be held with local groups having representation that they choose.</p> <p>Some meetings should be held in the evening to accommodate working people who are interested in their communities.</p>	<p>The points raised in this response relate to matters of detail which will be dealt with in the deposit LDP.</p> <p>The Council will ensure, through conditions and legal agreements referenced in the LDP, that the infrastructure is in place to accommodate new developments.</p> <p>The LDP Delivery Agreement facilitates local public meetings as part of the deposit LDP consultation process. It is envisaged that these meetings will take place in the evening.</p>
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Bridgend Local Development Plan

Vision & Strategic Options

Mr F J

Jenkins

900 V 1

SectionNo	Stakeholders Response	Councils Response
Section 2	I agree with the draft vision and I think it adequately incorporates the objective of the community strategy.	Agreement with the LDP Vision is noted and welcomed.
Section 3	No	Noted
Section 4	No	Noted
Section 5	Option 3 - Trend Based Growth Strategy	Noted
Section 6	Option 3 - Trend Based Growth Strategy	Noted
General Comment		THIS RESPONSE IS NOT FROM A LDP KEY STAKEHOLDER FORUM MEMBER THE RESPONSE WAS SOLICITED BY COMMUNITIES FIRST PARTNERSHIP - BLACKMILL WHO CONSULTED THEIR OWN MEMBERS

Bridgend Local Development Plan

Vision & Strategic Options

Over 60s

MRS M

JENKINS

928 V 1

SectionNo	Stakeholders Response	Councils Response
Section 2	<p>The four Associations named in Section 1 are not professional in these issues but are concerned that their views are listened to. Villages have special issues such as community facilities when housing is being considered.</p> <p>Elderly housing is an important issue. Social housing must also be included.</p> <p>Local public meetings must be held with local groups having representation that they choose.</p> <p>Some meetings should be held in the evening to accommodate working people who are interested in their communities.</p>	<p>The points raised in this response relate to matters of detail which will be dealt with in the deposit LDP.</p> <p>The Council will ensure, through conditions and legal agreements referenced in the LDP, that the infrastructure is in place to accommodate new developments.</p> <p>The LDP Delivery Agreement facilitates local public meetings as part of the deposit LDP consultation process. It is envisaged that these meetings will take place in the evening.</p>
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Bridgend Local Development Plan

Vision & Strategic Options

Mr David

Edwards

930 V 1

SectionNo	Stakeholders Response	Councils Response
Section 2	<p>It addresses issues such as affordable accommodation and environmental quality in what seems to be a conflicting manner.</p> <p>Increasing development will not enhance the quality and character of the Welsh landscape and will jepordise any tourism scheme.</p>	<p>The issues raised do not appear to directly link with the draft LDP Vision.</p> <p>Whilst LDP Vision statement is intended to be a balanced statement of how the planning policy framework for the County Borough will operate. There will be specific policies relating to landscape protection and tourism promotion.</p>
Section 3	<p>Increasing housing demand by increasing intrusion into the countryside will impact on tourism opportunities.</p>	<p>Noted</p> <p>However, the two preferred growth options should be able to be accomodated on existing allocations and brownfield land (subject to detailed assessment).</p>
Section 5	<p>Development both industrial and domestic should be confined to recognised brownfield sites or alternatively on the parameters of existing developments where access to services such as roads, water, sewage can be readily achieved with minimum damage to countryside.</p>	<p>The two preferred growth options should be able to be accomodated on existing allocations and brownfield land (subject to detailed assessment).</p>
Section 6	<p>Trend Based Growth Strategy. Advantages far outweigh disadvantages.</p>	<p>Noted</p>
General Comment		<p>THIS RESPONSE IS NOT FROM A LDP KEY STAKEHOLDER FORUM MEMBER</p> <p>THE RESPONSE WAS SOLICITED BY COMMUNITIES FIRST PARTNERSHIP - BLACKMILL WHO CONSULTED THEIR OWN MEMBERS</p>



Mr David Llowslyn
Assistant Director, Planning Services
Bridgend County Borough Council
Civic Offices
Angel Street
Bridgend
CF31 4WB

Our ref:
Your ref: 31A158D/SJHL
Date: 09 August 2007

Dear Mr Llowslyn,

Bridgend Local Development Plan – LDP Key Stakeholder Forum Meeting Strategic Growth Options

In connection with the Key Stakeholder Forum meeting held on 28 June 2007 we thank you for the opportunity to comment upon the Bridgend Local Development Plan (LDP) Strategic Growth Options.

We feel it inappropriate to direct the Local Planning Authority as to its choice of preferred option; however, we would like to pass on some environmental information which should aid you in your decision. As such, we have consulted with our internal departments to gauge what affects the two predicted growth patterns will have and what factors may constrain them.

I have enclosed a copy of the Priority Issues Package for Bridgend, which although still in draft form, may help form a baseline for environmental information. Below is a summary of the key information we have gathered.

Issue No. 1 - Foul Drainage

Lack of sewerage capacity can threaten fresh water ecosystems and natural habitats. Sub-catchments where significant pressures have been identified are Caerau, Maesteg, Betws and Sarn.

Issue No. 15 – Flood Risk

Approximately 21 km² of the County Borough (8% of 255km²) is in the floodplain. In Bridgend County Borough there are already 9,000 properties within the floodplain. With regard to new residential developments we would refer you to the Welsh Assembly Government's development advice maps and TAN 15 Development and Flood Risk. Highly vulnerable developments such as residential should not be permitted within floodplains. Thus, this 21 km² should be withdrawn from any available land assessments. This in turn could have a knock on effect to the housing land bank.



Water Resources

Our assessment shows the Tywi resource zone should accommodate either of the proposed growth strategies (UDP Growth or Trend Based Growth). However, we can only comment on the potential impacts of the predicted growth on strategic water resources. There could be more localised capacity constraints in the existing water distribution system; additional information can be sort from Dwr Cymru Cyf. We have received quite a bit of detail from our internal consultation, which you may find useful. I have attached a copy under Appendix 1.

I hope the information provided helps you come to a decision of a preferred Strategic Growth Option. If you require any more information please contact me at the Llandarcy office.

Yours sincerely



Bonnie Miles
Planning Liaison

DRAFT

Priority Issues Package: Bridgend – Local Development Plan



AMLYDDITH 15
AMODURHEID CYMRU
Environment
Agency Wales

This package was created on
18/07/2007

Overview of Package

This package identifies priority issues and pressures that threaten the environment in Wales and Bridgend. It is intended for use at the Strategic Environmental Assessment scoping stage of the Bridgend Local Development Plan. More detailed data and information required for the SEA will be made available.

All Wales: priority environmental issues

1. CLIMATE CHANGE:

Mitigation – the UK has committed to making a 20% reduction in green house gas emissions between 1990 and 2010. Expert opinion indicates much larger reductions are required.

Constraints - Plans and strategies should seek to improve energy efficiency, reduce emissions, and protect and increase natural processes which remove atmospheric CO₂.

Adaptation – climate change will increase the extent of floodplains, lead to changes in coastlines, increase severe and extreme weather events, and raise average temperatures.

Constraints - Plans and strategies should consider future climate scenarios (e.g. increased rainfall intensity, high winds, flood events, etc.) and incorporate appropriate resilience.

2. AIR POLLUTION

The UK has committed to reductions in oxides of nitrogen and sulphur. Elevated levels of ozone are an issue for all Wales, owing to emissions of oxides of nitrogen and volatile organic compounds (VOCs) across Europe. Particulate matter and ozone have no exposure threshold levels below which adverse human health effects do not occur.

Constraints - Plans and strategies should seek to reduce emissions.

3. FLOOD RISK MANAGEMENT

There are 170 000 properties on floodplains in Wales.

Constraints – plans and strategies should, where possible, seek to migrate developments and infrastructure away from floodplains and coastal areas that will be lost through the effects of climate change.

4. LOSS OF ECOSYSTEMS AND BIODIVERSITY

Governments across Europe have agreed to halt the loss of biodiversity by 2010. Within the UK 391 species and 45 habitats are under threat.

Constraints – plans and strategies should, where possible, seek to increase biodiversity and the extent of natural ecosystems. This should include efforts to increase the area available to wildlife, green corridors between natural habitats, and reduce pollution.

5. WASTE

Wales has an estimated 5 years of remaining landfill space at current rates of disposal.

Constraints - Plans and strategies should seek to contribute to the National Waste Strategy for Wales (Wise About Waste) and the Wales Regional Waste Plan.

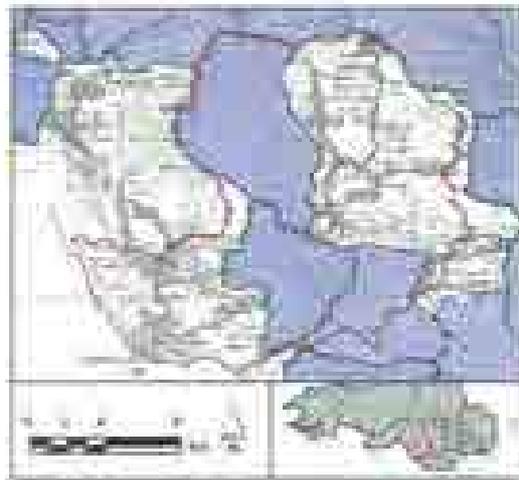
Local Authority: priority environmental issues



AGLWYBETH YN
AMLYCHRED CYMRU
ENVIRONMENT
AGENCY WALES

This section lists all issues that have been identified and recorded by Environment Agency area team experts and also includes interpretation from the regional Data, Information, & Environmental Assessment Unit.

Issue No: 1 Category: Water Driver: SEA Scale: Local Authority



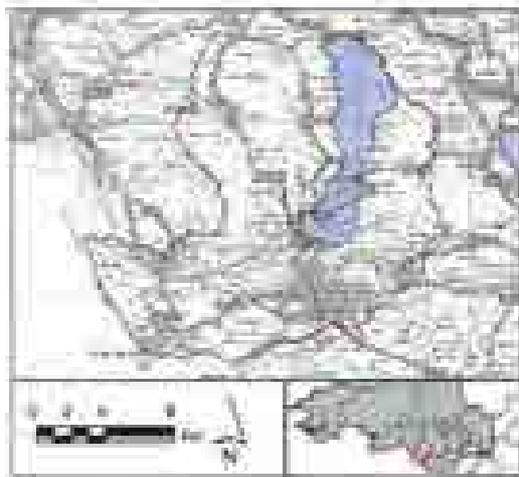
Description

(01/02/2007) Lack of sewerage capacity, urban diffuse pollution, and industrial point sources threaten fresh water ecosystems, and natural habitats. Subcatchments where significant pressures have been identified are shown on the map.

Constraints

Plans and strategies should not increase pressure through point and diffuse inputs to waters; and where possible should seek to reduce.

Issue No: 2 Category: Water Driver: SEA Scale: Local Authority



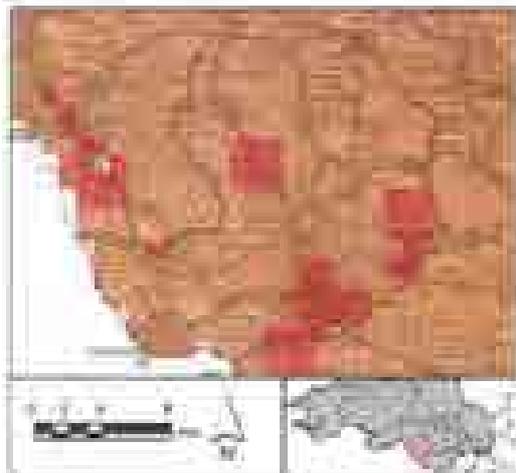
Description

(01/02/2007) Sheep dip is a significant threat to water quality and fresh water ecosystems. The map shows areas identified as being at greatest risk.

Constraints

Plans and strategies should attempt to reduce, and where possible eliminate pollution episodes.

Issue No: 6 Category: Air quality



Driver: SEA Scale: Local Authority

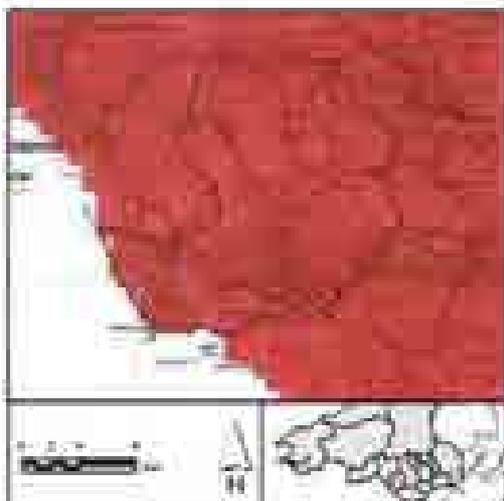
Description

(01/02/2007) Concentrations of particulates (PM10) are elevated, and in some areas exceed the 20 µg/m³ standard (to be achieved by end of 2010). A significant increase in traffic levels will exacerbate the existing problem. The map displays modelled concentrations >16 µg/m³ (in orange) and >20 µg/m³ (in red) on a 1km grid.

Constraints

Plans and strategies that may increase emissions should assess impacts.

Issue No: 7 Category: Air quality



Driver: SEA Scale: Local Authority

Description

(01/02/2007) Concentrations of ozone are elevated in much of the local authority. A significant increase may lead to further exceedance of the 100 µg/m³ standard. The map displays those sites where modelled concentrations exceed the 100µg/m³ (8 hour average) standard on more than 10 days a year, on a 1km grid.

Constraints

Plans and strategies that may increase emissions of oxides of nitrogen and volatile organic compounds (VOCs) should assess impacts.

Issue No: 8 Category: Air Quality



Driver: SEA Scale: Local Authority

Description

(01/02/2007) Modelled emissions of Arsenic are elevated in the local authority and constitute 25% of Wales' total. The map displays modelled emissions >60 kg/km² (in red) on a 1km grid.

Constraints

Plans and strategies that may increase emissions should assess impacts.

Issue No: 9 Category: Air Quality



Driver: SEA

Scale: Local Authority

Description

(01/02/2007) Modelled emissions of Chromium are elevated in the local authority and constitute 18% of Wales' total. The map displays modelled emissions $>5 \text{ kg/km}^2$ (in red) on a 1km grid.

Constraints

Plans and strategies that may increase emissions should assess impacts.

Issue No: 10 Category: Biodiversity



Driver: NEA

Scale: Local Authority

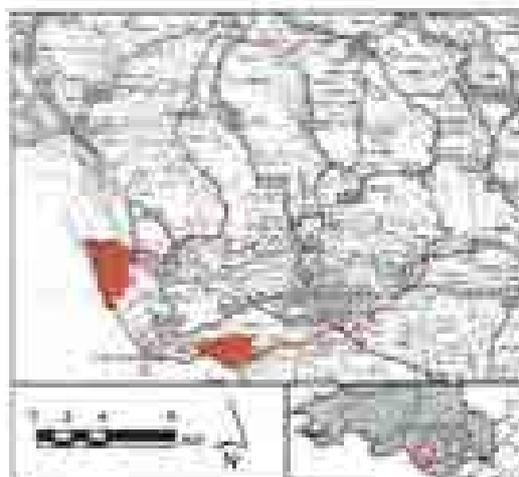
Description

(01/02/2007) The spread of non-native (alien) species threatens natural habitats. Coastal areas where a threat has been identified are shown on the map.

Constraints

Plans and strategies should not lead to the introduction or spread of alien species (e.g. public planting schemes to use native species where possible), and where possible should seek to reduce.

Issue No: 11 Category: Biodiversity



Driver: SEA

Scale: Local Authority

Description

(01/02/2007) Some natural habitats, including protected habitats, are threatened by acid deposition. The mapped areas are Natura 2000 sites. Those predicted to exceed critical loads are shown in red.

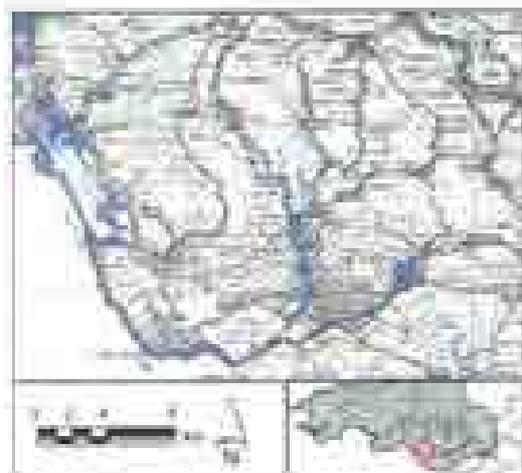
Constraints

Plans and strategies should, where possible, lead to reductions in emissions of oxides of nitrogen and sulphur. There should be no increase.

Issue No: 15 / Category: Flood Risk

Driver: SEA

Scale: Local Authority



Description

(01/02/2007) Approximately 21 km² of the local authority (8% of 255 km²) is in the floodplain. There are already 9000 (9% of 98 000) properties in the floodplain.

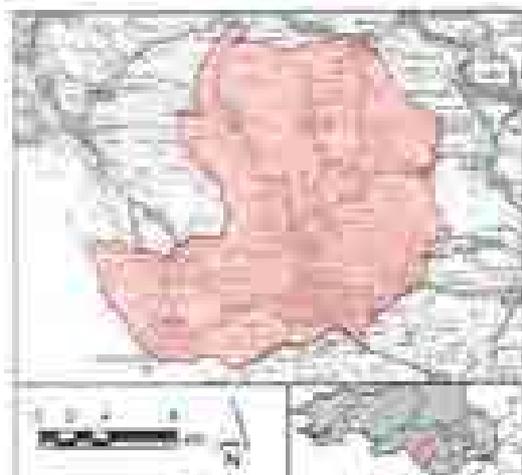
Constraints

Major infrastructure should where possible be kept outside the floodplain, and future developments should not occur on the floodplain.

Issue No: 16 / Category: Waste

Driver: SEA

Scale: Local Authority



Description

(01/02/2007) There is limited remaining landfill life in the local authority.

Constraints

Plans and strategies should seek to minimise production of waste contribute to the SW Wales Regional Waste Plan.

Appendix 1

Bridgend falls within the Tywi resource zone. This is a large resource zone that also covers Swansea and Neath Port Talbot, a large area of Carmarthenshire and parts of another four local authorities. We can only provide information on public water supply at a strategic level therefore Dwr Cymru Welsh Water should be consulted to obtain more local information on availability of water resources and infrastructure.

Our household growth and public water supply report (2007) assessed the impact of the household growth projections published by the Welsh Assembly Government (WAG) in 2006 on public water supply in Wales. We apportioned WAG's household growth projections for four regional groupings in Wales to water resource zones based on population. Bridgend accounts for about 9% of the population in the South-East regional group. 9% of the household projections for South-East regional group between 2006-16 is only 5,600, which is lower than either of the two proposed strategies of 7,470 or 8,100.

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Our assessment shows the Tywi resource zone should accommodate either of the proposed growth strategies for Bridgend. Companies will publish draft new plans in 2008. Changes in the companies' assessment of supply and demand may change our conclusions set out in our initial assessment.

Our report only considered the potential impacts of growth in demand on strategic water resources. We did not consider more localised capacity constraints in the existing water distribution system of water companies.

Bridgend County Borough Council needs to talk to DCWW to obtain local information on the availability of water resources and infrastructure. This will avoid delays to plans and reduce their impact on the environment.

There are significant uncertainties in household growth and the effects of climate change on water resources. Using water wisely will help us cope with these uncertainties. We recommend Bridgend's LDP should encourage water efficient development.

Appendix 3

Sustainability Appraisal of the Bridgend Local Development Plan

Strategic Growth Options Briefing Paper

BRIDGEND COUNTY
BOROUGH COUNCIL

Sustainability Appraisal of the Bridgend Local Development Plan

Strategic Growth Options
Briefing Paper

June 2007



1 Introduction

- 1.1 This note is the first appraisal stage in the joint Sustainability Appraisal and Strategic Environmental Assessment (SA) of the Local Development Plan (LDP) for Bridgend County Borough. This considers the implications in terms of the sustainability of the options of the 'Bridgend Local Development Plan: Strategic Growth Options Briefing Paper'.
- 1.2 Information on the approach and purpose of the SA, and the sustainability issues in the County Borough, is contained in the SA Scoping Report which is available on the Bridgend County Borough Council website. This provides a useful background reference to this paper.
- 1.3 Housing development will be one of the greatest users of land that the LDP has control over, therefore planning and distributing this growth is one of the greatest contributions to achieving more sustainable development the plan can have. The LDP can have little influence over the existing patterns of towns and villages in the County Borough or where development already has planning permission. Deciding the amount of future growth can have a significant influence on the future sustainability of the area. Such as in choices made over the use of land, setting future travel patterns and by guiding development to more accessible locations and creating a more self-contained settlements that support the people who live within them.
- 1.4 This appraisal considers the different levels of growth proposed in the options paper and what the implications may be for sustainable development, section 3 and Appendix 1. The SA also considers the approach taken to setting options and if this is likely to be effective at identifying and implementing sustainable growth in the area, section 2.

2 Defining the Options

- 2.1 In this section the SA reflects on how effective the identified options for growth are likely to be in identifying a suitable and sustainable level of housing growth. The approach to defining and choosing growth options is set out in the Local Development Plan Wales Manual which states:

“Numerical projections of demand provide a starting point. This then needs to be weighed against the vision for the area, capacity issues within the locality, including housing and employment land availability, potential for redevelopment, regeneration requirements, infrastructure and environmental constraints.”

“[Growth options] must all be realistic possibilities taking account of national planning policy, the Wales Spatial Plan (and the WSP Area Programmes), regional plans or strategies and local aspirations and sensitivities expressed through the Community Strategy. The number of options considered will be influenced by the nature of the LPA area, its complexity and the scope for alternative development scenarios. It will not be acceptable to generate options that are unrealistic or clearly unsustainable.” **LDP Wales Manual, June 2006 (6.3.2)**

- 2.2 This approach is similar to that used in Bridgend, with regional working playing a strongly influential role. The starting point for the Bridgend growth options was from collaborate working with the South East Wales Spatial Planning Group (SEWSPG). This group was involved in preparing housing growth levels for the entire South East Wales area, based on population and household growth projections produced by Welsh Assembly Government, and the Wales Spatial Plan 2004. Several scenarios were tested using different approaches to modelling projections. These were based on differing growth and migration scenarios resulting in differing housing requirements.
- 2.3 WAG produced household projection figures for the region which were agreed by SEWSPG in May 2006. The projection was for an additional 108,900 households in the region from 2003 to 2021. This was taken as the working hypothesis for growth to be apportioned to the eleven local planning authorities of the region. The apportionment was based on a range of factors include the capacity and need for growth in each of the local authority areas. In the Spring 2007 a 'Memorandum of Understanding' was produced by the SEWSPG giving final indicative apportionment figures. This memorandum showed that Bridgend County Borough would need to be provide an average of 500 homes per annum from 2006-2021. It is worth noting that this figure and all the other apportionment figures have been rounded for simplicity, and for Bridgend the pre-rounded figure was slightly higher than 500.
- 2.4 It was agreed by SEWSPG that the regional housing apportionment figures should not be 'set in stone' and flexibility in their use is permitted by the local authority areas. Therefore Bridgend has chosen to test growth options other than the SEWSPG apportionment figure, with the aim of identifying what the implications would be in planning for the County Borough.
- 2.5 Taking the SEWSPG agreed figures forward into thinking about growth options for Bridgend it was necessary to consider what the possible options may be. The lowest possible housing completion figure was identified by considering what housing land was already committed through planning permission and allocations of the UDP. Therefore these housing figures are already committed to development. In addition at this time no review of these allocations is necessary given the relatively recent review of these for the UDP, that was adopted in May 2005, and was set to run to 2016 prior to the revision of the planning Act and the need to prepare Local Development Plans. This means that whatever growth strategy the Council decide to adopt, this level of growth, plus a trend based prediction based on windfalls and the development of small sites, will occur in the County Borough. In line with the good practice principles of sustainability appraisal and LDP preparation this has been defined as the 'do nothing' approach.
- 2.6 The approach followed in setting other options appears reasonable and should help in identifying an appropriate level of growth for the County Borough, helping to meet sustainability objectives. However, it may have been useful to express some of the options in terms of what these would mean to the future vision for the County Borough. This would give more of an understanding of how effective various options would be in achieving differing goals for the area, instead of simply expressing the options as incremental increase from the 'do-nothing' scenario. For example a high housing growth rate matched to a rapidly growing economy; growth to achieve greater social and economic regeneration of valley towns and villages; or low growth to

ensure greater levels of environmental protection with low or no economic growth.

- 2.7 This type of approach may have also been useful in the selection of high and very high growth options. Unlike the other three options these have not been drawn up using any particular precedent or past level of growth and have less justification, which may have been improved by some detail of how these would contribute to a defined vision for the County Borough.

3 Appraisal of options

Levels of growth

- 3.1 At this very early stage in planning for the County Borough it is difficult to predict with any degree of accuracy the likely impacts on sustainable development of options that set out only marginally differing levels of growth to 2021. Therefore the appraisal considers the growth options on a scale from low to high instead of each of the five options individually. The appraisal assesses what the impacts may be for the lowest level growth (similar to Option 1), a medium level of growth and a high level of growth (similar to Option 5) with other effects being somewhere on this scale of low to high.
- 3.2 The matrix in Appendix 1 shows the appraisal of these three options against the four main themes of sustainable development. These themes are the basis of the sustainability framework developed for the SA of the LDP (Appendix 2). At this stage it is preferable to keep the appraisal to these four broad categories, as drawing finer conclusions against specific objectives is unlikely to be suitable given the ambiguities involved. In order to reduce ambiguities the appraisal matrix has been completed based on the assumption that the desired level of growth set out for each option is fully implemented, i.e. housing is delivered at the rates and in the quantities specified.
- 3.3 The completed matrix identifies a broad picture of potential sustainability implications, without trying to make assumptions of sustainability effects that is not possible to substantiate between the options and the differing levels of housing development they would deliver. Particularly as in some instances these only differ by 1000 homes over the lifetime of the plan to 2021, and actual effects will also depend on the spatial distribution regardless of the option chosen giving very different potential outcomes.
- 3.4 There are several themes that emerge from the appraisal of the options in Appendix 1, these include the need:
- to make sure that the level of housing growth is not too high and is in keeping with economic growth of the towns and villages of the County Borough. This is to ensure the towns and villages of the County Borough do not become commuter settlements with residents travelling out the area each day for work and instead move towards greater self-containment in terms of jobs and housing;
 - to deliver sufficient housing to meet all needs, including affordable housing provision where necessary and the provision of high quality housing;
 - securing sufficient housing development to help achieve a level of economic growth that reduces the need and distance travelled for work, including a reduction in the gross commuting levels in and out of the County Borough for work;
 - to support the use of previously developed land and prioritise its use over greenfield sites, as over allocating land would increase the risk of inefficient land use unless strict phasing policies can be applied;

- to ensure sufficient housing growth is permitted to support regeneration objectives in the County Borough with adequate supply to spread growth around the towns and villages where it is needed;
- for housing growth and infrastructure provision to be matched, and the potential for higher growth options to deliver greater levels of infrastructure through contributions and obligations;
- to create more self-containment and access to shops and services by enabling large mixed use allocations, or ensuring allocations are well located to allow access to existing services and public transport;
- the impacts on landscape and biodiversity are likely to be greater where there is a larger greenfield land requirement under a higher growth option, although these issues should be a consideration on the development of any site, such as on previously developed land that has been vacant for a long period.

Delivering development

- 3.5 In addition to these considerations there may be additional sustainability implications if the levels of growth allocated for do not come forward as desired, which was the assumption on which the sustainability matrices in Appendix 1 are based. If this is the case then other impacts may become apparent if the incorrect scale and rate of growth is planned for.
- 3.6 Overestimating and planning for too great a level of growth, and allocating sites accordingly, is likely to result in sites not being taken up in the most sustainable way. Greenfield sites will often be chosen first for development due to the comparative ease of developing this type of site and allocations in the larger settlements with higher market demand as compared to a previously developed site in town centre areas, or less attractive locations. This may have sustainability impacts on the efficient use of land reducing car use and achieving more economic and social equity. It may be possible to overcome this to some extent if allocations, both housing and employment, are phased with successive stages only released after other sites have been developed, although adverse effects are still likely.
- 3.7 Underestimating the housing need may lead to other sustainability issues, such as development coming forward in less coherent and piecemeal way, on sites that may be less compatible with the spatial strategy for the LDP and less strategically planned for in terms of access of services for instance. This could have detrimental impacts on an approach to aid regeneration or help reduce car use and promote equitable access to jobs and services.

The five growth options

- 3.8 There are also certain specific sustainability issues for the five alternatives presented in the Options Paper, related to how appropriate pursuing these options would be in terms of achieving sustainable development.
- 3.9 The basis for selection of the '**Do nothing strategy**' is not based on any particular policy approach to the housing need in the County Borough and represents past UDP allocations. Therefore implementing this option could mean an underestimation of housing land needs, leading to market pressure and a great amount of land released on an ad hoc basis, contrary to a planned and sustainable spatial strategy.

- 3.10 The next level of development is in the **UDP Growth Strategy** option that would set housing growth at levels set out in the existing Unitary Development Plan. This would require a change in policy to reduce growth from the level currently occurring, as set out in the **Trend Based Growth Strategy** option. This would be a more modest growth rate and require some additional policies to constrain the rate at which housing is coming forward for development and may be effective in creating more self-contained development in the County Borough. The trend based option is a 'business as usual' approach allowing development to come forward at current levels with no need to change the approach being taken at present.
- 3.11 The **High Growth** and **Very High Growth Strategy** these options would see housing growth rates increase up to a level above existing rates. This level of growth may be difficult to achieve in the area due to market demand and runs a clear risk of making parts of the County Borough into 'dormitory' settlements that serve the housing needs to those who work outside the area. The highest levels of growth would therefore require very careful spatial planning to ensure that this level of development is compatible with environmental protection objectives and helps make sustainable communities.
- 3.12 However, whichever growth level chosen many sustainability impacts will be dependent on how this development is distributed around the County Borough, such as connections to jobs and services and support to areas in need of regeneration. Further stages of the sustainability appraisal will give consideration to how these matters are addressed in the emerging spatial distribution strategy to guide the sustainability performance of the LDP.

4 Summary and conclusions

- 4.1 The approach taken in the appraisal of the growth options was to consider the likely different impacts of a high, medium and low level of growth. The outcome of which revealed sustainability benefits and detriments of all of the approaches.
- 4.2 Ensuring the more efficient use of land was a key consideration and the lower growth levels were more likely to be accommodated on existing allocations and previously developed sites. However, it may be that existing allocations need reviewing both in terms of suitability of location and the proposed density of development to further ensure land is used as effectively as possible and to avoid the loss of greenfield sites.
- 4.3 Higher and medium growth rates are more likely to be able to deliver a greater range of sites for development and these may help achieve several sustainability benefits. Including regeneration benefits for areas in need of renewal and allowing allocations to be located in areas where there is good access to services, shops and jobs, thereby helping to ensure equitable access and reducing the need to travel. Larger allocations may also be able to support a mix of uses on site including jobs and shops, again reducing the need to travel.
- 4.4 Medium and higher growth rates are also more likely to be able to support a growing economy in Bridgend by providing a local workforce. Although care will need to be taken as if housing growth is too rapid it may encourage parts

of the area to become commuter areas with people commuting daily for work outside the County Borough or to more prosperous parts of the area, with detrimental impacts on community character of these residential areas, the regeneration needs of parts of the County Borough and on the environment by encouraging car travel.

- 4.5 In addition to this appraisal of growth rates consideration was also given to the approach to defining options, and its suitability in identifying an approach that would help realise the vision for the County Borough.
- 4.6 The approach taken uses the existing capacity available in existing planning permissions and allocations as a starting point, identifying this as the low growth option, and comparing other options against this. The other options were based on existing UDP figures, trend in completions (a business as usual approach) and then two higher options rather than any discussion of housing need/demand. The SA does query whether it may have been useful to set out some detail on what these options would mean in relation to a vision for the future of the County Borough, to help guide the level of development toward a defined goal for the area to 2021, which may be useful in ensuring in ensuring stakeholders have a fuller understanding of the implications of the options.

5 Sustainable development – moving forward with the LDP Strategy

- 5.1 This section of this note discusses some matters that may be suitable to address when moving forward with the LDP in order to ensure decisions can be fully informed in order to identify a sustainable route for delivering development.
- 5.2 Matters that will need to be considered in order to secure more sustainable development are:
 - the spatial distribution of the determined level of growth to the towns and, if suitable, villages of the County Borough;
 - the need to identify the current or planned roles of these settlements, or sub-areas, so development can be distributed accordingly to meet identified needs and deliver sustainable strategies for each town and village;
 - a possible need to review housing land availability, including reviewing existing allocations without full planning permission to ensure that these are still appropriate. This should include provisional density of development to make the most efficient use of land, in line with sustainable development objectives;
 - revisiting the employment allocations to ensure that there is not over allocation of land that would lead to the unsustainable take-up of sites, for instance on greenfield land or in locations that do not support greater equity of access or help reduce car use. This should include de-allocation of sites or reallocation to alternative uses as appropriate;

- making decisions on policy approaches that would impact on development in the County Borough, such as setting appropriate minimum densities and the brownfield / greenfield split for development;
- Making decisions on where development should be constrained for environmental protection purposes.

Appendix 1: Sustainability appraisal matrix of scale of growth options

Social progress which recognises the needs of everyone		
LOW	MEDIUM	HIGH
<ul style="list-style-type: none"> • Delivering lower levels of homes will result in a lack of affordable housing, particularly if the economy continues to grow, this may give rise to overcrowding or people having to move out of the County Borough. • Local people may be less able to afford homes in economic growth areas of the County Borough pushing them out of the area or into less accessible locations further from employment. • Potential for a changing community character in less affordable areas as local families move away, new people move into the area. • A low level of development may not be able to support the provision of associated services that would come from planning contributions and obligations associated with new development, for example schools, open space and transport improvements. This may impact the accessibility of services and facilities for new and existing residents. 	<ul style="list-style-type: none"> • It is evident that the provision of homes at a medium growth rate would be less able to provide the number of homes to meet needs as high growth would, but more than a low growth option. • Suitable distribution of this number of new homes around the County Borough will be key to enabling better access to facilities by linking to existing town centres and employment areas. • This approach may not be able to support substantial additional provision of new services, shops and facilities as high growth options, as contributions to development may not be sufficient. Therefore there may be greater pressure on existing services. 	<ul style="list-style-type: none"> • This approach may deliver a large amount of new homes, thereby helping ensure there is housing to meet all needs. • If the level of homes under a high growth approach is achieved then there may be changes to the community character of the County Borough as more people move into the area to live. • With a higher level of growth it may be possible to support the provision of a range of new facilities, shops and services throughout the County Borough, helping to ensure a better access for new and existing residents. In addition large scale 'urban extensions' can be planned to contain a mix of uses, including housing, employment and education that will improve access for future residents. • The level of housing may mean that housing is better distributed around the County Borough, with greater focus on valley town regeneration areas for instance. • Providing a greater number of homes than jobs in the area may have adverse impacts on the character and services available in the County Borough, as it runs the risk of turning parts of the area into 'commuter towns' supporting employment elsewhere in Wales. Such areas can often lack character and any community identity as all residents look outside the area to meet their day-to-day needs including for work, shop and cultural participation.

Effective protection of the environment		
LOW	MEDIUM	HIGH
<ul style="list-style-type: none"> The low land take under a low growth option is more likely to see a protection of biodiversity and landscape of value. Although it will be important to respect biodiversity wherever it is found, even on previously developed land. 	<ul style="list-style-type: none"> Depending on the location of new allocations this approach has the potential to adversely impact on biodiversity and landscape where new greenfield sites are allocated. However this will be less than for a high growth option and it may be possible to identify locations where these impacts can be avoided or mitigated against. 	<ul style="list-style-type: none"> The large land take required by this option may mean that a larger green field land requirement is needed. This is very likely to have impact on biodiversity and landscape quality. Building a large number of new homes in and around the towns of the County Borough will need to be carefully planned in order to protect and enhance the built character, large new developments have a substantial opportunity to make built environment contributions.

Maintenance of high and stable levels of economic growth and employment		
LOW	MEDIUM	HIGH
<ul style="list-style-type: none"> It is unlikely that this lower level of growth will be compatible with strong economic growth in the area, as there will not be the workforce to support growth in the local area. 	<ul style="list-style-type: none"> This level of growth is likely to be able to support the economy of the County Borough, and may help promote more self-containment in the area for living and working. 	<ul style="list-style-type: none"> Higher rates of housing growth are likely to be better able to support high levels of economic growth, this is particularly the case as this option will have advantages in increasing the proportion of people in the working age demographic with benefits for the economy. Higher housing levels may be able to support employment of other cities and towns of south east Wales by providing more affordable housing.

Prudent use of natural resources		
LOW	MEDIUM	HIGH
<ul style="list-style-type: none"> • The approach is likely to help previously developed sites allocated for housing to be developed in preference to greenfield land, due to limited choice of sites. • This approach may not lead to development in locations where it is needed, as allocations are already set this may mean accessibility of jobs and services are compromised as economic and housing growth cannot be planned together. • Fewer houses may mean that more people have to live outside the area and commute into Bridgend for work, which is likely to lead to increased car use and the environmental impacts associated with this. This includes air pollution with climate change related and health related effects as well as the consumption of non-renewable fuel resources. • A low growth rate offers low flexibility in the choice of most appropriate sites for new housing so that they are linked to existing and planned employment. This disjointed approach is unlikely to lead to the most sustainable pattern of development in terms of living and working locations, with the potential for the inefficient use of land and increasing the distances travelled for work commuting. • The lower level of development is likely to have a lesser demand for energy and other resources, although this may only be local in scale as housing demand to meet needs may be built elsewhere outside the County Borough resulting in the same level of residential development. 	<ul style="list-style-type: none"> • This approach may be most suitable in finding a balance between economic growth and housing provision, and help the better self-containment of the County Borough in terms of jobs/homes. This should have the advantage of reducing car commuting and associated environmental and natural resource impacts. • This level of growth is unlikely to be able to support larger new urban extensions to existing towns, and therefore it will not be possible to create self-contained new 'sustainable communities' a mix of different uses in easy proximity to one another as they will be too small to contain a sufficient. This therefore may encourage more car travel, with associated local and global impacts. • A level of growth above that already allocated for (as in the low growth approach) will also allow a greater choice of sites which may help promote mixed use development associated with the development of new employment land. 	<ul style="list-style-type: none"> • Depending on the level of economic growth in the area this level of housing growth could have adverse impacts on reducing car use. This will particularly be the case if people who continue to work in other parts of South East Wales move to Bridgend due to lower house prices and must commute daily to work elsewhere. This is not compatible with objectives of reducing resource use. • However a higher growth rate may make it possible to build carefully planned new extensions to towns in the area that can support a mix of uses, including housing, employment and services, that could help reduce the need to travel and therefore the use of natural resources. • This level of new housing will require a large amount of land including greenfield sites. If allocations are not phased this could lead to a green field sites being developed in preference to previously developed land, which would mean land is being used inefficiently. However given the quantity required it is likely that all allocations will be taken up in the long-term by the end of the plan period, including previously developed land. • This level of housing development will use a large amount of natural resources in construction and energy and water during their operation. However as housing is likely to have been provided anyway, albeit outside the County Borough pursuing this approach in terms of resource use may not be significant. • A level of growth above that already allocated for (as in the low growth approach) will also allow a greater choice of sites which may help promote mixed use development associated with the development of new employment land.

Appendix 2: Sustainability framework for the sustainability appraisal of Bridgend Local Development Plan

Concern	Objective
Social progress which recognises the needs of everyone	
Accessibility	To ensure an increase in accessibility to opportunities, transport and to all services and information in the County Borough.
Housing	To provide the opportunity for people to meet their housing needs
Health, safety and security	To improve overall levels of health and safety, including the sense of security, for all in the County Borough
Community	To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend
Effective protection of the environment	
Biodiversity	To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value
Landscape	To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements
Built Environment	To maintain and enhance the quality of the built environment, including the cultural/historic heritage
Prudent use of natural resources	
Air	To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere
Climate change	To ensure that new development takes into account the effects of climate change
Water	To maintain and improve the quality and quantity of ground waters, river waters and coastal and bathing waters
Land / Soil	To use land efficiently, retaining undeveloped land and bringing damaged land back into use
Minerals and waste	To maintain the stock of minerals and non renewable primary resources
Renewable energy	To increase the opportunities for energy generation from renewable energy sources
Maintenance of high and stable levels of economic growth and employment	
Employment	To ensure that there is a vibrant local economy which is at the forefront of a wider regional economy and provide diversity of employment within the County Borough and support a culture of entrepreneurship
Wealth creation	To achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity

APPENDIX D

**BRIDGEND LOCAL DEVELOPMENT PLAN
2006 – 2021**

**REGULATION 15
(PRE-DEPOSIT PROPOSALS)
INITIAL CONSULTATION REPORT**

OCTOBER 2009

PURSUANT TO REGULATION 16(3) OF THE TOWN AND COUNTRY
PLANNING (LOCAL DEVELOPMENT PLAN) (WALES) REGULATIONS 2005

Louise Fradd
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1. Introduction

- 1.1 In February – March 2009, Bridgend County Borough Council formally consulted on its Pre-Deposit Proposals for the Bridgend Local Development Plan (LDP). The Pre-Deposit Proposals identified the issues facing the County Borough leading to the development of the LDP Vision and a set of Objectives required to achieve the Vision. The Pre-Deposit Proposals considered various growth options and spatial strategies which are assessed to determine the most appropriate and sustainable way of achieving the LDP Vision and Objectives. The culmination of this process in the Pre-Deposit Proposals was the Preferred Strategy and Strategic Policies which form the development framework and basis for meeting the key economic, social and environmental needs of the County Borough over the Plan period up to 2021.
- 1.2 The purpose of this document is to record how the Pre-Deposit Proposals consultation was carried out, the levels and detail of the feedback that was received and the Council's initial response to the main issues raised. The document concludes by outlining a series of Action Points which the Council consider necessary to carry out to fully inform the Deposit LDP which is due to be published in 2010.
- 1.3 This report has been prepared in accordance with the requirements of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005. It will be updated when the Deposit LDP is published to demonstrate how the comments received at this stage have informed the content and context of that document. This report will then form part of the wider Consultation Report (Regulation 22 (2)(c) refers) which the Council is obliged to prepare and submit to the Planning Inspectorate with the Deposit LDP for examination.

2. Consultation Methods

- 2.1 Bridgend County Borough Council approved the LDP Pre-Deposit Proposals document for consultation on 11th December 2008.
- 2.2 The consultation period began on Thursday 12th February and ended on Tuesday 31st March 2009.
- 2.3 The package of consultation documents comprised:
 - Bridgend LDP Pre-Deposit Proposals (December 2008)
 - Sustainability Appraisal of the Bridgend Local Development Plan Pre-Deposit Proposals
 - Sustainability Appraisal Non-Technical Summary
 - Habitats Regulations Assessment of the Bridgend Local Development Plan Pre-Deposit Proposals – Screening Assessment
 - *Planning Our Future* – Summary Newsletter
 - Representation Form (See Appendix 6)

Notifications and Publicity

- 2.4 A CD containing the complete package of consultation documents (see above) was sent to all the specific consultees listed in Appendix 4 of the Bridgend LDP Delivery Agreement. 4 Hard Copies of all the documentations were sent to the Welsh Assembly Government. Copies of the accompanying notification letter can be found at Appendix 4.
- 2.5 A notification letter was sent to approximately 1,000 individuals and organisations listed in the LDP Consultation database. This letter described the purpose of the consultation, where more information could be obtained and how representations could be made. A copy of this letter can be found at Appendix 5. A representation form was also enclosed.
- 2.6 Public Notices were placed in the Glamorgan Gazette on the 12th and 19th February 2009. A media release was also distributed to all local and regional newspaper, radio and television organisations. A copy of the notice and media release are contained in Appendix 7.
- 2.7 A copy of the LDP Newsletter, *Planning Our Future*, was distributed to all households in the County Borough. This summarised the contents of the Pre-Deposit Proposals and outlined where more information could be viewed and how representations could be made. A copy of the newsletter is available at Appendix 8.
- 2.8 A series of exhibitions and drop-in sessions were held throughout the County Borough during the first fortnight of the consultation period. These included utilising busy town centre locations on Saturdays

(including a stall at the Bridgend Valentine's Fayre). At least one exhibition and one drop-in session were held in each of the LDP Sub-Areas. Both the exhibitions and drop-in sessions were staffed by officers from the Council who could answer specific questions and offer advice on how to formally respond. Details of the dates, times and venues of these events are summarised in the consultation poster contained in Appendix 9. Copies of the exhibition material can be seen at Appendix 10.



Figure 1 Exhibition at Bridgend Valentine's Fayre

- 2.9 Before each drop-in session within each sub-area, local County Borough Council Members and Members of local Town and Community Councils were invited to attend a briefing session on the Pre-Deposit Proposals. This would enable them to answer queries from their local constituents on how the proposals would affect their local area.
- 2.10 With the help and assistance from the Council's Communities First teams, 10 local exhibitions were held in the Cornelly, Caerau, Llangeinor, Bettws, Sarn and Wildmill wards of the County Borough.
- 2.11 The package of consultation documents were made available on Bridgend County Borough Council's website: www.bridgend.gov.uk, including direct links from the homepage and the Planning Department pages. A facility was also made available where respondents could complete an online form to make representations. Approximately 1,000 'hits' were received by the webpage during the consultation period.
- 2.12 Hard copies of all the consultation documents were placed at 'deposit' locations which included every library in the County Borough (including the mobile libraries) as well as the Customer Service Centre at the Council's Civic Offices in Angel Street, Bridgend. (See notice at Appendix 7).



Figure 2: Online Consultation

2.13 Each of the secondary schools in the County Borough and Bridgend College were directly contacted and invited to take part in the consultation process. This was offered in a number of ways including: making available exhibition material, questionnaires and newsletters within the schools, using in-house publicity mechanisms such as websites and internal newsletters etc, and arranging for small groups of pupils and classes to visit the community exhibitions and/or drop-in sessions. Whilst responses to the invitations were limited, pupils from the Porthcawl and Maesteg areas attended the exhibitions held in their area to find out more about proposals.

3. Consultation Responses

LDP Stakeholders

- 3.1 A meeting of the LDP Stakeholder Forum was convened on the 11th February 2009 at Bridgend Rugby Club. The purpose of the meeting was to outline and discuss the contents of the LDP Pre-Deposit Proposals including the Preferred Strategy.
- 3.2 The role of those delegates attending the meeting was to represent the views of their organisation / group for the purposes of round table discussions on the contents of the Pre-Deposit Proposals. It was then for the delegates to be responsible for the dissemination of information from the meeting to members of their respective group / organisation.
- 3.3 In total 71 delegates, representing 32 organisations attended the meeting.



Figure 3: LDP Key Stakeholder Forum Meeting: 11th February 2009

- 3.4 A report which includes copies of the presentation given, notes of the discussion which took place and the Council's initial responses to points that have been made is included in Appendix 1.

Written Responses

- 3.5 In total, 177 responses were received from specific consultees, organisations and individuals. Summaries of the all the responses received from Specific Consultation Bodies are included at Appendix 2. Responses from other respondents are included at Appendix 3. These are accompanied by the Council's initial response and identified actions for the Deposit LDP.
- 3.6 **It is important to note that, as further evidence base work will continue up until the deposit of the LDP, the Council's comments and the identified actions are an initial response to comments made and should not be construed as a commitment on behalf of Bridgend County Borough Council to change the Preferred Strategy in any way.** As stated in paragraph 1.3 above, this

document will be updated at the deposit stage of the LDP to definitively show how the comments made to the Pre-Deposit Proposals have influenced the content of the Deposit LDP.

- 3.6 In this summary, the Council has not included details of site specific representations or those who support the proposals.
- 3.7 Details of responses made to the Sustainability Appraisal and Habitats Regulation Assessment Screening Opinion will be detailed in a separate report.

4. Identified Actions for the Deposit LDP

- 4.1 Taking into account those comments made at the LDP Stakeholder Forum, together with those from the Specific Consultees and other individual / organisations, the Council has identified a number of Actions for further consideration and the requirement for additional work to be undertaken to fully inform the Deposit LDP which may lead to changes to elements of the Preferred Strategy. These have been collated below:

Environment

1. The Council will consider including reference in the LDP Vision to acknowledge the need to protect and enhance the environment which is identified as a strategic objective.
2. The results of an analysis of Open Space will be included in the Deposit LDP, in accordance with the requirement of TAN16.
3. Implications arising from Strategic Noise Maps for road, rail and settlement areas will be taken account of in the Deposit LDP where appropriate.
4. A Strategic Flood Consequences Assessment (SFCA) is currently being undertaken and will inform the Deposit LDP.
5. The existing Special Landscape Areas of the County Borough are currently being reviewed against a regionally-agreed methodology using data from LANDMAP. These updated areas will be included within the Deposit LDP.
6. The Council is currently undertaking an assessment of allotment land in the County Borough and is likely to develop an Allotment Strategy as part of the wider assessment of Open Space, the results of this will be used to inform the Deposit LDP.
7. The Council will be reviewing existing settlement boundaries for inclusion in the Deposit LDP.
8. The Council currently pursues a policy of designating Green Wedges between settlements in order to protect their identity. These designations will be reviewed for inclusion in the Deposit LDP.
9. In line with emerging national planning policy on the use of the Code for Sustainable Homes in new housing development it seems a sensible suggestion to monitor the number of dwellings built to different code levels. This will be included in the Deposit LDP.

Employment / Household Projections and Sites

10. Reference to, and the implications of, the new 2006-based household projections will be included in the Deposit LDP.
11. The Council acknowledges that there is currently an apparent incompatibility between the employment forecasts in the LDP Trend Based Growth option (produced the Chelmer Population & Housing Model) , and the employment forecasts undertaken by Cambridge Econometrics for Bridgend County Borough Regeneration Strategy “Fit for the Future” detailed in table 7.1 of the Pre-Deposit Proposals (PDP). Further work is being undertaken to examine these relationships. Details of the outcome of this work will be included in the Deposit LDP.
12. The precise distribution of employment and housing land will be included in the Deposit LDP.
13. Site viability will be an important factor when allocating sites for development in the Deposit LDP, the Council will be undertaking site viability assessments to inform this process.
14. The Local Housing Market Assessment (LHMA) is currently being prepared and its results and implications for planning policy will be included in the Deposit LDP.
15. An assessment regarding Gypsy and Traveller Accommodation has recently been commissioned. The results and implications of this study will be included in the Deposit LDP.
16. The housing supply generated by Candidate Sites that are proposed to be included in the Plan will be confirmed in the Deposit LDP.
17. Reference will be made to individual housing site figures in the Deposit LDP. In addition, non-strategic sites for housing that meet the requirements of the Preferred Strategy will also be identified in the Deposit LDP.

Community Uses

18. Where identified, the land-use requirements of health facilities will be earmarked in the Deposit LDP.
19. NHS Modernisation will enhance community facility provision even if this involves the closure of some not fit-for-purpose buildings. However this may be clarified by changing the phrase “community facility” to “community facility provision” in the policy.

Retailing and Commercial Centres

20. A Review of the role and accessibility of District Centres and their boundaries will be evidenced for the Deposit LDP.
21. The Deposit LDP will contain policies which facilitate the required quantum of retail development for the Plan Period, and associated policies will allow for flexibility if this situation changes.

Minerals

22. Issues regarding a 500m mineral buffer zone will be covered in policies in the Deposit plan.
23. National planning policy requires the Council to identify coal resources that are present in the County Borough. These will be identified in the Deposit LDP.
24. The mining legacy of the County Borough is referenced in paragraph 3.2.4 of the Pre-Deposit Proposals, and will be considered in future landscape assessment work.
25. The Council is aware of the requirements of national policy in relation to mineral resources, including the safeguarding of limestone and coal resources, and this will be reflected in the Deposit LDP.
26. The suggested amendment to state that Coal is present in the centre and north of the County Borough is accepted and will be included in the Deposit LDP.
27. Aggregate resources will be safeguarded in the Deposit LDP and a criteria based policy included to assess any mineral proposals.
28. Policies will be revised in accordance with the final coal TAN which has now been issued.

Regeneration

29. The land use implications and requirements of any regeneration programmes / strategies will be reflected where appropriate in the Deposit LDP.

Tourism

30. The Council agrees with the suggestion to replace 'green' and 'eco' tourism with 'sustainable' tourism and will make the necessary changes in the Deposit LDP.

Unstable Land

31. Unstable land will be the subject of a specific policy in the Deposit LDP.

Transportation

32. National planning states that disused railways should be safeguarded from development where there is a realistic prospect for their use for transport purposes in the future. A policy to protect such routes will be considered for inclusion in the Deposit LDP.
33. The land-use implications of the Council's Rights of Way Improvement Plan will be used to inform the Deposit LDP.

Energy

34. In the case of the Strategic Search Areas identified in TAN 8: Renewable Energy, the 2006 refinement exercise forms part of the evidence base to the LDP and will be used to inform policies and allocations within the Deposit LDP.

Other

35. It is open to the Council to review existing UDP allocations in light of relevant evidence and any new land use designations will be set out in the Deposit LDP.
36. The Council considers that the LDP Vision / objectives can be achieved by the Strategic Policies, which are to be monitored. However the objectives will be reviewed for the Deposit LDP to assure that there are no inconsistencies or conflicts between them and that they are properly linked and prioritised.
37. Where the Council has identified in Appendices 2 and 3 of this report, it will re-examine the appropriateness of the wording of specific objectives and strategic policies.
38. The Council agrees that the Deposit LDP should be based on a sound evidence base and that the Preferred Strategy is sufficiently flexible and deliverable. The Council will ensure all the identified actions highlighted by the Welsh Assembly Government are considered, implemented and developed through a robust evidence base for the Deposit LDP and its supporting documentation.
39. The Council agrees that, when drafting the Deposit LDP, it will take into account updated information and references highlighted in the responses from the Environment Agency Wales and the Countryside Council for Wales (See Appendix 2).

40. Concerns raised regarding how the SA / SEA and HRA processes have been integrated into the plan making process to date will be addressed by including a 'change log' in a further consultation report as suggested by the Council's consultants to support the Deposit LDP and the full SA / SEA and HRA.

- 4.2 It should be noted that the above should not be viewed as a definitive list of actions as these will develop and evolve as work on the LDP progresses and, if other, underlying circumstances change this may require further evidence to support the Plan.

**Appendix 1: Report of the LDP Key Stakeholder Forum
11th February 2009**

Report of Bridgend LDP Key Stakeholder Forum Pre Deposit Proposals

**11th February 2009
Bridgend Rugby Club, Tondu Road**

1. Introduction

The third meeting of the Bridgend Local Development Plan Key Stakeholder Forum was held on the 11th February 2009 in the President's Suite of Bridgend Rugby Club from 9.30am to 1pm. The purpose of the meeting was to:

- Update members of the forum on LDP preparation to date;
- To outline and discuss the contents of the Bridgend LDP Pre Deposit Proposals including the Preferred Strategy; and
- To advise forum members of the public consultation arrangements

(Members of the Forum had previously been circulated hard copies of the LDP Pre Deposit Proposals document)

The LDP Pre Deposit Proposals were issued for public consultation between 12th February – 31st March 2009.

In total, 71 delegates attended the Forum meeting, representing 32 organisations (see Appendix A). These were divided into nine tables for the discussion sessions regarding the draft document.

The purpose of this report is to highlight the issues which were raised at the meeting (in verbal discussions and from notes taken by table invigilators) for consideration by the Council when it assesses official representations made during the LDP Pre Deposit Proposals consultation.

2. LDP Update

The Forum meeting began with a presentation from the Council (see Appendix B) refreshing members on the background to the LDP system and how and why it operates.

The presentation continued by outlining Bridgend LDP preparation to date including: developing the evidence base, LDP Delivery Agreement and the Candidate Sites register. In relation to the Pre Deposit Proposals, members were briefed on what the document should contain; how the Stakeholder Forum had been involved to date on formulating a draft vision and growth options; and how the LDP Strategy had taken shape over the previous 12 months.

3. Issues, Vision and Objectives

The presentation from the Council continued with a 'bookmark' guide to the Pre Deposit Proposals document including: the Spatial Context in Chapter 3; the Policy Context in Chapter 4; and the Needs and Issues (including national, regional and local issues) highlighted in Chapter 5.

The LDP Vision (chapter 6 of the document) was fully described in the presentation which then proceeded to outline the four strategic LDP themes, including the LDP objectives which lie underneath these.

At this point there was a break in the presentation for a discussion to take place on the issues, Vision, themes and the objectives. Each table was designated one of the specific themes (Place, Environment, Regeneration and Communities) to discuss in more detail, guided by detailed information and questions contained in the delegates packs.

The following questions are those asked in the delegate's material to guide debate. Each table had a Bridgend County Borough Council officer facilitating discussion and a Scribe to make notes. The notes in this report reflect broadly the discussion and the issues raised which are relevant to the LDP Pre Deposit Proposals only.

Do you agree that all of the Key national, regional and local planning issues have been identified?

Are there any important issues that are not identified?

Issues identified by stakeholders were:

- General improvements of transport and highway network, including public transport facilities. Numerous locations were identified by stakeholders as having traffic problems.
- Public transport provision in some areas were highlighted as having problems
- Tourism and heritage promotion potential of the County Borough
- Overall access to affordable housing and the need for it to be in the right location.
- That adequate facilities for an ageing population will need to be provided.
- A perception that the County Borough has high levels of out-commuting.
- Need to keep town and village identities, both physically and culturally.
- Need for renewable energy acknowledged but it shouldn't be at the detriment to local peoples lives; need to consider alternatives to wind power in this respect
- Flooding problems in many parts of the County Borough need to be addressed

- The protection of existing children's play space / open space and the remediation of deficiencies in provision across the County Borough.
- Lack of tourism accommodation in the Valley areas
- Appropriate levels of infrastructure within the County Borough. There are some deficiencies at the moment which could be exacerbated by new development.
- The availability of appropriate types of employment and the skills training associated with this
- Balancing the need to identify mineral resources with the protection of environmentally sensitive sites.
- The need for sustainable drainage systems in new developments.
- The need for more local input from communities in the planning processes
- Concerns regarding the economic impact of the recession on our major settlements

Council's Initial Response

The Council considers that those issues identified by Stakeholders have been expressed, or addressed by the content of the Pre-Deposit Proposals document.

Does the LDP Vision adequately reflect the aspirations of the Community Strategy in land-use terms?

There was a general consensus amongst the delegates that the LDP Vision was appropriate and reflected the aspirations of the Community Strategy. However, one table in particular expressed concern regarding about the absence of any explicit reference to the built and natural environment in the Vision statement and its relationship to the Community Strategy Vision. The word 'relaxing' was also considered not to be appropriate in reflecting planning for leisure activities etc.

Council's Initial Response and Identified Actions for Deposit LDP

The Council considers that there is merit in the concern regarding reference to the environment within the LDP Vision. The Council therefore proposes to consider including such a reference within the Vision for the deposit LDP. The word 'relaxing' is reflective of the Community Strategy and the Council therefore considers it appropriate to be used in this context.

Do the Objectives address the particular issues previously identified under the LDP themes?

Do the Objectives contribute to the LDP Vision?

General discussion regarding the LDP themes and objectives concluded that they were generally appropriate, apart from the issue mentioned about regarding the environment. Some delegates requested that more information and background to these be given in order to justify them.

4. LDP Preferred Strategy and Delivery

The meeting continued with a further presentation from the Council regarding the formulation of the LDP Preferred Strategy and included a discussion on the 5 Population and Housing Growth Options together with the 3 Employment Growth options out of which a hybrid preferred growth option was generated. Next, the 3 spatial options for the distribution of growth were explained and the preferred Regeneration Led Spatial Strategy selected.

The LDP Strategy was then fully outlined and it was explained that it relied on 4 Strategic Regeneration Growth Areas, 4 Strategic Employment Sites and Targeted Regeneration Projects. The LDP Strategic Diagram was also displayed and interpreted. Each facet of the 4 themes within the Preferred Strategy was explained to the delegates.

Each table then discussed the Preferred Strategy components which related to the theme which had been allocated to it, following questions for discussion included in the delegates pack.

Do you consider that taking forward the three underlying growth options / strategy is the most appropriate way of balancing and meeting the social, economic and environmental needs and objectives of the plan?

Do the elements of the Preferred Strategy provide the most appropriate spatial framework for distributing development?

Do you agree with the components and actions of the Strategy?

Discussion on the Preferred Strategy was very broad and, given its very nature, encompassed many topics:

- The appropriateness of the housing growth figures and how they were sourced and calculated.
- Recognition that the strategic importance of the Valleys Gateway area.
- That encouragement should be given to the reuse of vacant homes to assist in housing provision
- The approach the LDP takes to existing development within flood plains
- The scope for Strategic Employment Sites to be located in the Valley areas
- The appropriateness / viability of the Strategic Employment Sites, with some particular concerns regarding specific sites
- Need for jobs to be located near to where they are needed
- The scope for the LDP to provide improved community facilities
- The viability of the Strategic Regeneration Growth Areas given the downturn in the economy
- Improving access and transportation links to the Growth Areas from outside the County Borough and from other settlements within to ensure they can absorb this growth.

- The promotion of tourism in general and specific tourist destinations and attractions
- The need for effective partnerships between the Council and other bodies to ensure effective delivery of the Plan.
- That appropriate levels of infrastructure will need to be provided to deliver the development envisaged in the Plan.
- Possible imbalance between the economic and environmental needs of the County Borough
- The general promotion and protection of the environment afforded by the document.
- If the Strategic Policies adequately protect all environmental site designations.
- The need to show areas of high landscape value in the Plan.
- That investigation takes place into using the rail network to transport waste.
- Concern that no growth will now take place in Pen-coed due to the situation regarding the rail level crossing.
- Specific policies to tackle river and water quality, air pollution and the protection of open spaces are needed.
- Factual corrections to data in the document were given.
- The impacts of Climate Change have not been fully recognised as well as how the Plan could contribute towards reducing those effects.
- There is a need to build on the concept of 'Place Making' to reflect the fact that the Plan will need to do more adaptation of existing places rather than create new ones.
- Monitoring indicators do not explain how they will be met.

Council's Initial Response and Identified Actions for Deposit LDP

The Council considers that those issues identified by Stakeholders have been expressed, or addressed by the content of the Pre-Deposit Proposals document. Identified areas of further work which will be developed for the deposit LDP include: an examination of the housing growth figures to ensure they correspond with projected economic forecasts and identifying areas of high landscape value (Special Landscape Areas).

5. Consultation and Further Questions

The Council's presentation concluded by outlining the consultation arrangements for the Pre Deposit Proposals which commenced the following day under the banner of: 'Planning Our Future'.

There was then an opportunity for members of the Forum to ask questions:

The first question related to the policy of protecting aggregates and coal.
It was explained that Welsh Assembly Government (WAG) policy requires the protection of identified land for these purposes to ensure the resource is not sterilised in the future. This has been done for aggregates in the existing UDP and will need to be done in the LDP in respect of coal reserves. These areas

have been identified by WAG and will need to be included in the deposit stage of the LDP.

Next, a series of questions were asked regarding the level crossing in Pencoed and possible measures to overcome this.

It was explained that a moratorium on development west of the railway line in Pencoed is in operation under policies in the UDP until a new road crossing can be made over the line in order to close the existing level crossing. The feasibility of providing this facility from new development is still being examined.

The position of Candidate Sites was queried.

The Candidate Sites which have been submitted will be assessed once the Council has considered representations to the Preferred Strategy and considered their likely implications. The sites will, first and foremost, be considered with respect to their compatibility with the Strategy which will avoid the need for detailed considerations of all of the sites to take place with the associated work loads on the Council and other statutory environmental bodies, as has happened elsewhere in South Wales.

A concern was raised that many of the proposals rely on infrastructure improvements to take place.

Many problems already exist regarding current levels of infrastructure in the County Borough. The purpose of the LDP will be to provide robust planning policies that require appropriate levels of infrastructure and community benefits (i.e from Planning / Section 106 Agreements) that arise from a proposal so that no additional burden is placed upon existing facilities etc.

It was queried why the Inquiry Inspector was not involved at this stage of preparation.

The LDP Inspector will examine the soundness of the whole process and this cannot be done until the Plan reaches deposit stage where a complete picture can be formulated and all the necessary evidence put in place to support policies.

6. Conclusion

The meeting concluded with a reminder to the members of the Forum that the purpose of the meeting was to generate discussion regarding the LDP Pre Deposit Proposals and that attendance did not represent an official representation to the public consultation exercise.

Delegates were encouraged to disseminate the information from the meeting to members of their group or organisation with a view to making a formal representation to the Council during the official consultation period which ended on the 31st March 2009.

Appendix A – Delegates at LDP Key Stakeholder Forum – 11th February 2009

Present: -

Helen L Baker	Ewenny Community Council
Heidi Bennett	BAVO
Lana Beynon	Neath Port Talbot CBC
Steve Bool *	Bridgend County Borough Council
Gareth Bray	Bridgend Business Forum
Councillor RDL Burns	Bridgend County Borough Council
Kathryn Carter #	Bridgend County Borough Council
Rob Chichester #	Bridgend County Borough Council
Anthony Clough	Newcastle Higher Community Council
John R Dilworth	Pencoed Town Council
Eugene Dubens	Caerau Communities First
Wendy Gardner #	Bridgend County Borough Council
Matthew Gilbert #	Bridgend County Borough Council
Richard Granville	Cornelly Community Council
Sarah Gray #	Bridgend County Borough Council
Councillor M Gregory	Bridgend County Borough Council
Gary Haines	Newcastle Higher Community Council
Clive Hare	Porthcawl Town Council
Ann Hawkins	Coychurch Higher Community Council
Gerald Hulin *	Bridgend County Borough Council
Stuart Ingram *	Bridgend County Borough Council
Adrian James	Countryside Council for Wales
Mr Jenkins	Maesteg Town Community Council
Huw Jenkins	Bridgend Waste Management Forum
Councillor A Jones	Bridgend County Borough Council
Eilian Jones #	Bridgend County Borough Council
Judith Jones	Cornelly Communities First
Mark Jones	Bridgend CCET
Susan Jones *	Bridgend County Borough Council
Hayley Landon #	Bridgend County Borough Council
Jonathan Lane *	Bridgend County Borough Council
Lee Le Bruilly	Bridgend Chamber of Trade
Councillor M Lewis	Bridgend County Borough Council
Rhian Lewis	Bettws Communities First
Zoe Livermore	Bridgend Environmental Partnership
David Llewellyn	Bridgend County Borough Council
Nick Lloyd *	Bridgend County Borough Council
Paula Lunnon	Llangeinor Communities First
Andy McKay	Blackmill Communities First
Richard Metford *	Bridgend County Borough Council
Bonnie Miles	Environment Agency Wales

Steve Moon *	Bridgend Biodiversity Partnership
A Y Morgan	Merthyr Mawr Community Council
Nicola Morgan #	Bridgend County Borough Council
David Morris	Neath Port Talbot County Borough Council
Dr Carole Newberry	Countryside Council for Wales
Kwaku Opoku-Addo *	Bridgend County Borough Council
Graeme Oram	Bridgend County Borough Council
Huw Owen	Bridgend Housing Partnership
Nan Owen	Coychurch Higher Community Council
Christopher Palmer	Wildmill Communities First
Allison Pesticcio	Brackla Communities First
Richard Price	House Builders Federation
Anthony Quick #	Bridgend County Borough Council
Christine Richardson	Pyle Community Council
Wayne Rose	Llangeinor Communities First
Councillor R Shepherd	Bridgend County Borough Council
Aled Singleton	Caerau Regeneration Forum
Diane Spanswick	Cornelly Community Council
Barbara Stubbs	Porthcawl Town Council
Paul Symons	Bettws Communities First
Councillor WHC Teesdale	Bridgend County Borough Council
Councillor G Thomas	Bridgend County Borough Council
Councillor M Thomas	Bridgend County Borough Council
Lucy Turner	Vale of Glamorgan Council
Suzanne Waldron	Environment Agency Wales
Bathan Walilay	Sarn Communities First
David Watkins	Environment Agency Wales
Councillor Westwood	Bridgend County Borough Council
Councillor P J White	Bridgend County Borough Council
Councillor M Wilkins	Bridgend County Borough Council

* = Table discussion facilitator

= Table discussion scribe

Appendix B – Presentation



Bridgend Local Development Plan (LDP) Pre-Deposit Proposals

Key Stakeholder Forum

11th February 2009

The Purpose of Today's Meeting

- ▶ To update Forum members on LDP preparation
- ▶ To outline and discuss contents of the LDP Pre Deposit Proposals including the Preferred Strategy
- ▶ To advise Forum members of the public consultation arrangements

Your Role as a Stakeholder

- ▶ To represent the views of your organisation / group for the purposes of the round table discussions
- ▶ To disseminate information from the meeting to members of your group / organisation
- ▶ Attendance at the Stakeholder Forum meeting does not represent an official representation to the Bridgend LDP Pre Deposit Proposals by your organisation.

Format of Presentation

- ▶ Brief resume of statutory requirements and reasons for preparing a LDP
- ▶ Run through of work undertaken since last Forum meeting to get us to where we are today
- ▶ **Telling the Story** - Bookmark guide to the main areas of Pre-Deposit documentation focussing on the issues that you, as a Stakeholder, need to consider to feed into the consultation process

What is a LDP?

- ▶ The Planning & Compulsory Purchase Act 2004 determines that all Local Planning Authorities in Wales have to prepare a Local Development Plan.
- ▶ It will supersede the Unitary Development Plan
- ▶ It will be the framework which will guide, promote and manage land use policy in the public interest over the next 15 years.
- ▶ Public examination of issues
- ▶ Right to be heard

Key Characteristics of a LDP?

- ▶ Long Timescale 10/15 years– not a quick fix
- ▶ Provides an investment framework for public / private sectors– certainty and continuity
- ▶ Provides a basis for determining planning applications
- ▶ Affect on property rights – positive & negative
- ▶ Directly / Indirectly affect everyone in the County Borough

Does Planning Affect You?



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LDP Preparation to Date

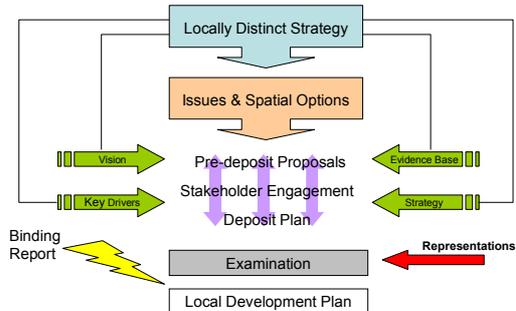


- ▶ LDP Delivery Agreement (November 2006 - amended October 2008)
- ▶ Candidate Sites (November 2006 – January 2007)
- ▶ Review and develop Evidence Base for LDP (ongoing)

Current Stage:

- ▶ Pre-Deposit Proposals

LDP Process



Pre-Deposit Proposals



Outlines the Authority's overall objectives for the plan, and the preferred strategy for growth or change, including preferred options for major development sites.

- ▶ Consider Issues
- ▶ Develop LDP Vision
- ▶ Develop LDP Objectives
- ▶ Consider Growth Options
- ▶ Consider Spatial Strategies
- ▶ Preferred Strategy

Pre-Deposit Proposals



- ▶ LDP Stakeholder Forum has previously considered:
 - Draft Vision
 - Housing & Population Growth Option
- ▶ Issues raised at previous meetings have fed into the process
- ▶ Consultation feedback has been used to formulate a draft LDP Strategy which has also benefited from:
 - Advice from Welsh Assembly Government
 - Emerging best practice - England / Wales
 - Challenge from external Critical Friends

Pre-Deposit Proposals



- ▶ **Result**
- ▶ Up to date & robust spatial and policy context including sub-area assessments
- ▶ Revised spatial Vision and Objectives
- ▶ Development of 4 strategic themes
- ▶ More robustly based growth options – housing / employment
- ▶ Draft Strategy and Policies formulated

Telling the Story..... Chapters 3-9



Chapter 3 The Spatial Context



- ▶ The Character of County Borough
- ▶ Environment
- ▶ Key Social Trends
- ▶ Key Economic Trends
- ▶ Sub Area Spatial Assessment

Sub Area Spatial Assessment



- ▶ The County Borough is sub-divided into eight sub-areas which reflect:
 - the existing Local Policy Forum areas
 - the geography of the area
 - existing settlements and the linkages between them



Strategic Linkages



- ▶ Consideration of inter-linkages with adjoining Local Authority areas:
- ▶ Vale of Glamorgan
 - St Athan, Cardiff Airport, Brocastle Link Road
- ▶ Rhondda Cynon Taf
 - Llanilid Development, Pencoed Technology Park, Windfarm SSA
- ▶ Neath Port Talbot
 - Kenfig Industrial Estate, Windfarm SSA, Afan Valley Mountain Park

Chapter 4 Policy Context



▶ **Consideration of other Plans, Strategies and Policy Statements**

- ▶ National Policy e.g. Wales Spatial Plan / Planning Policy Wales
- ▶ Regional Policy / Collaborative Working e.g. SEWSPG Housing Apportionment
- ▶ Local Policy e.g. The Community Strategy

Chapter 5 Needs & Issues



▶ Needs & Issues derived from:

- consultation feedback
- the Local Spatial Context
- the Sub Area analyses
- the Local Policy Context
- the National and Regional Policy Context.

Needs & Issues



▶ **11 National Needs and Issues.**

NR1 Recognition that Bridgend, Maesteg and Porthcawl-Pyle act as hubs for services, employment, housing and retail developments, whose success will spread prosperity to their surrounding communities;

Needs & Issues



▶ **44 Local Needs and Issues.**

LS 1 The County Borough contains nationally, regionally and locally important landscapes and coastal scenery which require identification and protection in the LDP.

Chapter 6 LDP Vision



- ▶ LDP Wales advises that, in preparing an overarching Vision for the LDP, authorities should incorporate the land-use aspects of their Community Strategy

▶ LDP Vision based on:

- the aims of the Community Strategy
- the specific spatial characteristics of the County Borough
- The issues affecting the County Borough

LDP Vision



By 2021, Bridgend County Borough will be transformed to become a sustainable, safe, healthy and inclusive network of communities comprising strong, interdependent and connected settlements with improved quality of life and opportunities for all people living, working, visiting and relaxing in the area.

The catalysts for this transformation will be:

- ▶ ***a successful regional employment, commercial and service centre in Bridgend;***
- ▶ ***a vibrant waterfront and tourist destination in Porthcawl;***
- ▶ ***a revitalised Maesteg; and***
- ▶ ***thriving Valley communities.***

Objectives



▶ The Vision will be delivered through four strategic LDP objectives / themes derived from the Community Strategy.

- To produce high quality sustainable **Places** where people want to live
- To protect and enhance the **Environment**
- To spread prosperity and opportunity through **Regeneration**
- To create safe, healthy and inclusive **Communities**

To produce high quality sustainable **Places**



The objectives for this theme are:

- ▶ To promote Bridgend town as a regional hub and the key principal settlement.
- ▶ To revitalise Maesteg by recognising its role as the principal settlement serving the Llynfi Valley.
- ▶ To realise the potential of Porthcawl as a premier seaside and tourist destination.
- ▶ To realise the strategic potential of the Valleys Gateway to provide for future development and facilities serving the whole of Bridgend County Borough.
- ▶ To reduce traffic growth, congestion and commuting levels while promoting the safe and efficient use of the transport network through integrated transport solutions and measures.

To protect and enhance the **Environment**



The objectives for this theme are:

- ▶ To promote, conserve and enhance the natural, historic and built environment of Bridgend County Borough.
- ▶ To tackle the sources of poor surface water and air quality.
- ▶ To manage development in order to reduce or mitigate against the risk and fear of flooding.
- ▶ To meet the council's commitments for mineral resources, waste management and waste disposal.
- ▶ To contribute towards the energy needs of Wales with a focus on the promotion of renewable energy.

To spread prosperity and opportunity through **Regeneration**



The objectives for this theme are:

- ▶ To build a more diverse, dynamic and self-reliant economy and business environment
- ▶ To provide a realistic level and variety of employment land
- ▶ To bring the benefits of regeneration to valley communities by directing new development to those areas at an appropriate scale
- ▶ To create sustainable destinations which capitalise upon the environmental assets and tourism potential of the area
- ▶ To enable Bridgend town to become an attractive and successful sub-regional retail and commercial centre
- ▶ To support realistic and viable town and district centres
- ▶ To protect and promote the role of smaller settlements.

To create safe, healthy and inclusive **Communities**



The objectives for this theme are:

- ▶ To provide a land use framework that recognises the needs of deprived areas within Bridgend County Borough, and which gives those communities the opportunities to tackle the sources of their deprivation.
- ▶ To ensure that there is equality of access to community services for all sectors of the community.
- ▶ To deliver the level and type of residential development to meet the identified needs of Bridgend County Borough, ensuring that a significant proportion is affordable and accessible to all.
- ▶ To provide for the required quantity and range of accessible leisure, recreational, health, social and community facilities throughout Bridgend County Borough.

Round Table Discussions



▶ Each table will discuss:

- Issues
- Vision
- 4 Themes
- Objectives under the theme which has been allocated to your table:
 - Places
 - Environment
 - Regeneration
 - Communities

Chapter 7 Growth Options

- ▶ **5 Housing Growth Options developed**
(discussed at the last LDP Key Stakeholder Forum meeting)
 - Population and Household Do Nothing Option
 - Population and Household UDP Growth Option
 - Population and Household Trend Based Growth Option
 - Population and Household High Growth Option
 - Population and Household Very High Growth Option
- ▶ **3 Employment Growth Options**
(introduced following feedback from previous consultation / advice)
 - Low Employment Growth Option
 - Medium Employment Growth Option
 - High Employment Growth Option

Growth Options Taken Forward

- ▶ **Population and Household Trend Based Growth Option – 3**
 - Resulting in Population in 2021 of 141,378
 - Total additional dwellings between 2006-2021 of 8100
 - Annual dwelling requirement of 540 units
- ▶ **Medium Employment Growth Option – 7**
 - Retain 160-170 hectares of the “committed” employment land primarily for B class and sui-generis employment uses and waste facilities
 - Re-assess remaining 40-50 hectares of UDP employment allocations for alternative and/or mixed use developments
 - Investigate the possibility of allocating additional employment land

Growth Options Taken Forward

- ▶ This combined approach offers the most realistic & flexible way of bringing housing & employment growth together, & restructuring the urban areas, whilst providing community benefits & protecting the environment.

Chapter 8 Spatial Strategies

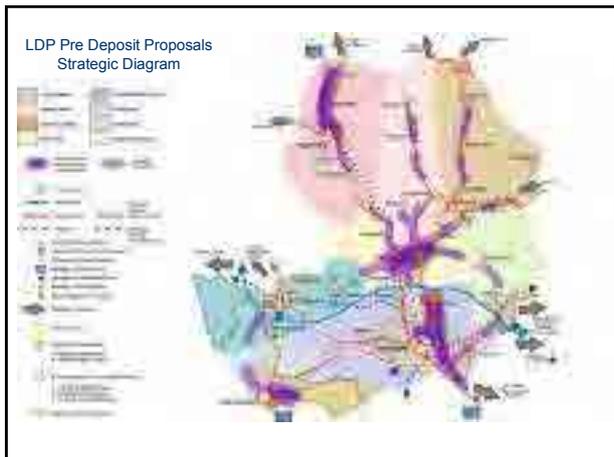
- ▶ Three alternative Spatial Strategies have been formulated for distributing development up to 2021.
- ▶ The Spatial Strategies are: -
 - **Strategy 1: Economic Led**
Distribute development in line with employment land supply
 - **Strategy 2: Regeneration Led**
Distribute development in line with the Regeneration priorities of the Council
 - **Strategy 3: Population and Settlement Led**
Distribute development in line with the existing population

Regeneration Led Spatial Strategy

- ▶ Best achieves the LDP Vision & Strategic Objectives
- ▶ Best overall fit with national & regional Policy
- ▶ Best at realising the regeneration priorities of the Council
- ▶ Makes the most meaningful contribution to securing social, environmental & economic benefits within the County Borough

Chapter 9 Preferred Strategy

Trend Based Population / Housing Growth Option incorporating the underlying principles of the **Medium Employment Growth Option** distributed in accordance with the **Regeneration Led Spatial Strategy**



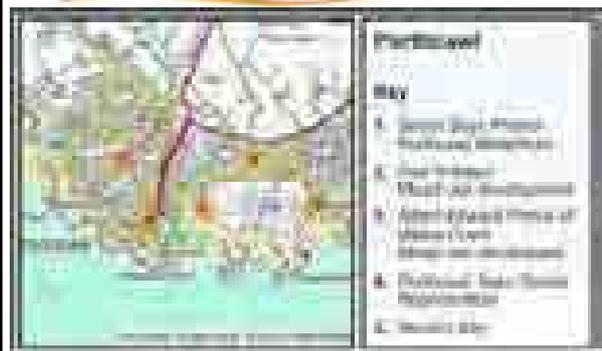
Delivery of the Preferred Strategy

- ▶ The successful delivery of the LDP Strategy relies on three elements:
 - 4 Strategic Regeneration Growth Areas
 - 4 Strategic Employment Sites
 - Targeted Regeneration Projects

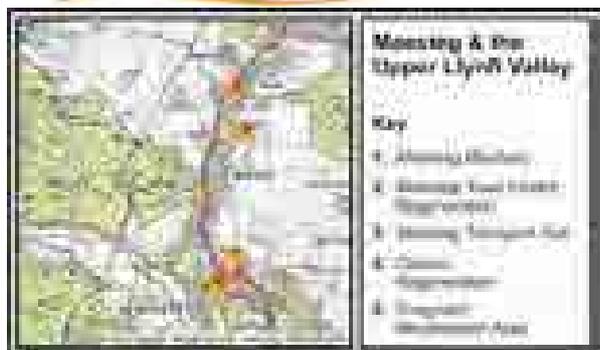
Preferred Strategy Strategic Regeneration Growth Areas

- ▶ The Strategy designates 4 Strategic Regeneration Growth Areas which will significantly contribute to the delivery of the LDP Vision & Objectives.
- ▶ The 4 SRGAs are located in:
 - Porthcawl (including 7 Bays Project)
 - Maesteg and the Upper Llynfi Valley (including Maesteg Washery and Coegnant Colliery)
 - The Valleys Gateway (including a range of inter-related private and public opportunities)
 - Bridgend (including Parc Derwen, Brackla Industrial Estate and Parc Afon Ewenni)

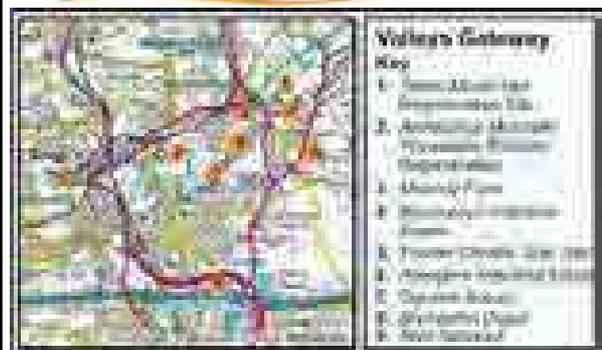
Preferred Strategy Strategic Regeneration Growth Areas



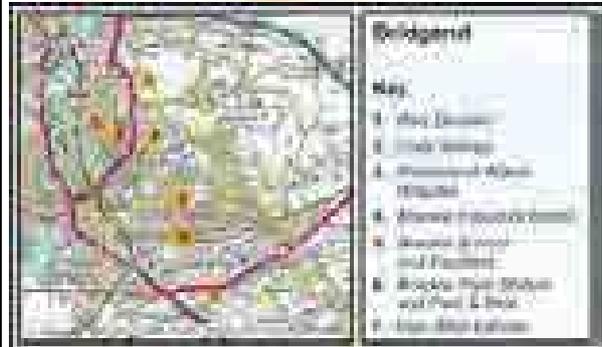
Preferred Strategy Strategic Regeneration Growth Areas



Preferred Strategy Strategic Regeneration Growth Areas



Preferred Strategy Strategic Regeneration Growth Areas



LDP Pre Deposit Proposals
Strategic Diagram



Preferred Strategy Strategic Employment Sites



- ▶ Also crucial to the Strategy and the future success of the economy is the establishment of high quality strategic employment sites.
- ▶ The proposed Strategic Employment Sites are:
 - Brocastle, Waterton
 - Island Farm, Bridgend
 - Pencoed Technology Park
 - Ty Draw Farm, North Cornelly

Preferred Strategy Targeted Regeneration Projects



- ▶ The Strategy also relies upon other targeted regeneration projects especially in:
 - Ogmore Valley
 - Garw Valley
 - Pyle / Kenfig Hill / Cornelly
 - Pencoed

Preferred Strategy Summary of Components and Actions



- ▶ **The Strategy:**
 - requires all development to meet Sustainable Place Making Principles;
 - requires all development to meet Strategic Transport Planning Principles;
 - requires the protection of sites of acknowledged natural or historic interest;
 - safeguards areas of aggregates and coal resources;
 - seeks to meet the County Borough's contribution to regional and local waste facilities;

Preferred Strategy Summary of Components and Actions



- ▶ **The Strategy:**
 - requires that the County Borough contributes towards the country's renewable energy requirements;
 - identifies and protects 160 – 170 hectares of employment land and re-assess 40-50 hectares of existing employment land;
 - directs new retail and leisure development to the town and district centres of the County Borough;
 - encourages high quality sustainable tourism.

Preferred Strategy



Summary of Components and Actions

▶ The Strategy:

- requires 8100 new dwelling units to be accommodated in the County Borough during the LDP period;
- requires the retention of existing community uses and facilities and seeks to develop new ones, where they are needed;
- requires new development to be accompanied by an appropriate level of infrastructure.

Round Table Discussions



▶ Each table will discuss:

- The LDP Preferred Strategy components which relate to the theme previously allocated.

LDP Pre Deposit Proposals
Strategic Diagram



Planning Our Future

Public consultation on the Bridgend Local
Development Plan Pre-Deposit Proposals

12 February - 31 March 2009



For further information
see www.bridgend.gov.uk/planning
or call 01493 60079 or email planning@bridgend.gov.uk

Planning Our Future Consultation



- ▶ Consultation being carried out under the 'Planning Our Future' banner
- ▶ Newsletter being delivered to every household in the County Borough
- ▶ 6 LDP Exhibitions
- ▶ 8 Community Drop In Sessions with Local Member / Community Council Briefings
- ▶ Bridgend Festivals Committee Valentines Event
- ▶ 1,000 Consultee Letters from LDP Database
- ▶ Website / Online Consultation
- ▶ Statutory Procedures and Requirements

Your Role as a Stakeholder



- ▶ To represent the views of your organisation / group for the purposes of the round table discussions
- ▶ To disseminate information from the meeting to members of your group / organisation
- ▶ Attendance at the Stakeholder Forum meeting does not represent an official representation to the Bridgend LDP Pre Deposit Proposals by your organisation.

Your Role as a Stakeholder



- ▶ **Please encourage your organisation to respond formally to the consultation process**
- ▶ **Please encourage members of your organisation to attend one or more of the many consultation events being staged across the County Borough over the next few weeks**

Appendix 2: Table of responses from Specific Consultees

Specific Consultee Responses

Summary of Representations Received from Consultee	Council's Initial Response and Identified Actions for Deposit LDP
<p>WELSH ASSEMBLY GOVERNMENT</p> <p>Having considered all the submitted documents provided by Bridgend CBC under Regulation 15, we acknowledge the amount of work undertaken by the authority to reach this stage. We also appreciate that the LDP system is new and that authorities have to learn as they progress.</p> <p>To ensure your authority secures a sound plan in due course, we have provided a strategic assessment of the Preferred Strategy document (as supported by the other documentation you have provided). We have indicated where evidence of soundness is not immediately clear.</p> <p>The annex to this letter sets out the detailed comments of the Assembly Government on the Preferred Strategy document; some comments relate to more than one test of soundness and we have provided cross-references where most appropriate.</p> <p>There is a lack of clarity over the growth options considered. It is unclear how the low, medium and high employment growth options (options 6-8) relate to proposed levels of housing provision. The preferred option may potentially not provide sufficient labour to meet projected employment growth with implications for commuting patterns. There are concerns whether the choice of the Trend Based Growth Option suitably reflects aspirations for economic growth in the sub-region.</p> <p>Clarify and evidence that all the options for increasing the affordable housing target have been explored, and clarify the reasons for and viability of the thresholds chosen to deliver affordable housing.</p> <p>A key component of the evidence base to support housing growth is the authority's Local Housing Market Assessment (LHMA) which is not due to be completed until later in 2009. This evidence may require refinement of growth levels in the Deposit LDP.</p> <p>Under sections 225 and 226 of the Housing Act 2004, local authorities have a duty to</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>The Council acknowledges that there is currently an apparent incompatibility between the change in economic participation (+1,283) which the LDP Trend Based Growth option predicts, and the Economic Forecasts for Bridgend County Borough (+3,846) predicted in table 7.1 of the Pre-Deposit Proposals (PDP). The data sources are separate, with the economic participation derived from the Chelmer Model and the Economic Forecast sourced from the Regeneration Strategy. Further work is being undertaken to streamline the data sources, examine relationships, particularly in light of the current economic situation, recent house-building activity and the role of Bridgend as sub regional employment centre serving a wider catchment to ensure that the figures in the Deposit LDP are realistic and viable. Details of the outcome of this work will be included in the Deposit LDP.</p> <p>Consideration for increasing the affordable housing targets will be examined, and viability of the thresholds chosen will be evidenced to inform the Deposit LDP.</p> <p>The Local Housing Market Assessment (LHMA) is currently being prepared and its results and implications for planning policy will be included in the Deposit LDP.</p> <p>An assessment regarding Gypsy and Traveller Accommodation has recently been commissioned. The results and implications of this study will be</p>

Welsh Assembly Government cont.

assess and consider the needs of Gypsy Travellers. There is no evidence of a Gypsy

Travellers assessment being undertaken in the Preferred Strategy, as no reference is made to Gypsy Travellers.

The employment land bank is an over allocation (217 hectares) when comparing short term and long term take up rates (the plan appears to favour the latter), which represents 11 hectares per year or 165 hectares over the Plan period.

Minerals safeguarding zones and buffer zones must be identified and taken into account in the strategy at an early stage.

The delivery of infrastructure to support development should be integral to the plan and articulated accordingly. This should have regard to, in broad terms, the scale, location, timing and funding of infrastructure to demonstrate sufficient certainty of delivery over the plan period.

It is unclear how flooding and inundation have been addressed by the strategy and the impact of flooding on the proposed strategic sites located in flood zones C1 and C2, including mitigation measures.

The Deposit LDP will need to be flexible enough to respond to circumstances such as emerging regional work (WSP, RTP, etc.) and evolving national / regional population / housing numbers and to include contingency approaches if the private sector are unable to deliver or the planned infrastructure required cannot be funded.

Providing that data exists and work has been undertaken where apparent gaps in the evidence base have been identified, we believe that much of this advice can be accommodated by refining and including emerging background material, for the deposit LDP and its supporting documentation. This should not delay deposit plan preparation and should improve the prospects of the plan being deemed sound.

You should document your response to our comments in your Consultation Report.

APPENDIX

included in the Deposit LDP.

The Preferred Strategy contains proposals for the assessment and reallocation of suitable employment sites in paragraphs 9.2.41 – 9.2.47 and will be further assessed in light of emerging evidence.

These have been considered but have not been included at this strategic stage of the plan. Details will be included at the Deposit LDP stage.

The Council considers that every development site will have its own individual circumstances when considering requirements for policy / infrastructure obligations. **Site viability will be an important factor when allocating sites for development in the Deposit LDP, the Council will be undertaking site viability assessments to inform this process.**

The PDP recognises flood risk issues and this is referenced in paragraph 3.3.13 and Policy SP2. **The Council considers that flooding is an important issue when considering future land uses and is undertaking a Strategic Flood Consequences Assessment to inform the Deposit LDP.**

Noted.

Noted.

Noted.

Welsh Assembly Government cont.

The Preferred Strategy generally aligns with the Swansea Bay – Waterfront and Valleys Area and the South East – The Capital Network Area of Wales Spatial Plan.

The preferred strategy document has a logical flow, from context and the identification of issues, through to the vision, options, preferred strategy and strategic policies. The plan is longer than would generally be expected at Regulation 15 stage, and some of the background information could have been put in background papers, however the information provided is clear and detailed.

- **Suggested Action:**
Whilst the background contextual information on key issues is very useful for this consultation stage, the Deposit LDP will need a more succinct format, supported by evidence.
- **Suggested Action:**
It is unclear what relationship the 8 sub areas in chapter 3 have to the statement in paragraph 6.1.4 which clearly identifies only 3 distinct areas.

The LDP vision (para 6.1) is distinct from the Community Plan Strategy and contains a spatial dimension indicating where key changes are to take place. However, it could be phrased around how places will have changed by 2021 rather than what will be the “catalysts for change”.

- **Suggested Action:**
The vision goes somewhat to dealing with spatial distinctiveness, yet it could be reworded to identify how places will change by 2021.

The LDP objectives (para 6.2) appear on the whole to be logical and numbering the issues and objectives increases transparency of how the objectives relate to the issues. Improvement would be to have SMART objectives which include details of the actions that need to be taken to achieve the vision (and timescales if appropriate) and which would make them easier to monitor and ensure the strategy is being delivered.

- **Suggested Action:**
Consider developing into SMART objectives for the Deposit LDP to aid

Noted.

The 3 areas referenced in paragraph 6.1.4 refers to the geography and physical character of the County Borough as discussed in Chapter three. These broad areas were refined into the 8 more detailed sub areas used for further assessment and drawing out issues. **The Council agrees this has created confusion and will amend text accordingly.**

The draft LDP Vision covers the whole of the County Borough. The spatial references within it refer to those areas which will provide the strategic development catalysts which are required to be delivered by 2021 to achieve the Vision.

The Council considers that the Visions / objectives can be achieved by the Strategic Policies, which are to be monitored. **However the objectives will be looked at for the Deposit LDP to assure that there are no inconsistencies or conflicts between them and that they are properly linked and prioritised.**

Welsh Assembly Government cont.

clarity for monitoring; ensure that any links / inconsistencies / conflicts between objectives are identified and also identify any prioritisation that is required.

The range of growth options considered appears to contain some anomalies.

Options 4 and 5 consider growth of 20% (648 dwellings per annum) and 30% (702 dpa) above the long term build rate over 1991-2006 (540 dpa). These are described as 'High' and 'Very High' growth options. The Council's Preferred Strategy encompasses Option 3, the trend based growth option (540 dpa) because it scores the highest in their assessment. However, it is unclear how the low, medium and high employment growth options (options 6-8) relate to proposed levels of housing provision. The level of housing provision in option 3 may not provide sufficient economically active labour to meet projected employment growth. This also has implications for commuting levels and patterns.

- **Suggested Action: It is advised that greater clarity is required to demonstrate why option 3 best meets the authorities needs, particularly in relation to employment labour provision, commuting patterns and impacts on adjoining plans.**

It is also unclear why Appendix D, which concerns the Consultation and Sustainability Appraisal, states at paragraph D1.5 that the Key Stakeholders Forum was "requested to give particular consideration to the merits of the trend-based growth strategy option, and the UDP growth based strategy option, with a view to informing which should be taken forward as the Preferred Strategy for growth in the LDP". This raises concerns as to whether the other alternative growth options were ever viewed by the Council as being possible options to be taken forward.

- **Suggestion Action: The opportunities and implications surrounding all options should be available to stakeholders to make fully informed conclusions.**

The Council acknowledges that there is currently an apparent incompatibility between the change in economic participation (+1,283) which the LDP Trend Based Growth option predicts, and the Economic Forecasts for Bridgend County Borough (+3,846) predicted in table 7.1 of the Pre-Deposit Proposals (PDP). The data sources are separate, with the economic participation derived from the Chelmer Model and the Economic Forecast sourced from the Regeneration Strategy. Further work is being undertaken to streamline the data sources, examine relationships, particularly in light of the current economic situation, recent house-building activity and the role of Bridgend as sub regional employment centre serving a wider catchment to ensure that the figures in the Deposit LDP are realistic and viable. **Details of the outcome of this work will be included in the Deposit LDP.**

All 5 options were presented to Council and the LDP Stakeholder Forum for consideration and debate. However the LDP Stakeholder Forum was informed that the UDP Growth Option and the Trend-Based Growth Option were the Councils preferred options for consideration.

Welsh Assembly Government cont.

Whilst the housing apportionment process is referred to it is unclear as to how evidence for the individual authority influenced its conclusions and thus how that relates to the chosen growth level.

- **Suggested Action:**
Clarify the evidence base that underpins the housing apportionment figure and demonstrate how further evidence has refined the process and influenced the strategy.

The strategic policies (section 6) appear to be well aligned to the objectives and the chosen strategy option; they usefully provide clear links to the objectives. A few wording amendments are suggested below. The package of policies in the Deposit LDP should provide greater detail.

Monitoring indicators are identified for the majority of Strategic Policy in section 9. The monitoring and implementation framework is critical in showing how the strategy will be delivered.

Employment

Policy SP10 (Employment and the Economy)

As of 2006, there were 217 hectares in the employment land bank, which was and continues to be an over allocation based on the figures provided. The Plan describes an over allocation based on the figures provided. The Plan describes short term and long term take up rates and appears to favour the latter as a basis for a land bank, which represents 11 hectares per year or 165 hectares over the Plan period. The Plan suggests existing sites will be reviewed, and those falling in to the surplus identified above are likely to be 'reassigned' for mixed use purposes.

The preferred growth option is medium employment growth which corresponds to the land bank referred to above. Most of this land appears to be made up of existing allocations although it was suggested some new sites may come forward following review. The first spatial strategy is economic led and suggests this would be based on the spatial distribution of existing employment allocations. Whilst the second strategy, regeneration is the preferred option it would be useful to see how regeneration will differ from the first strategy spatially, considering much of the employment land may be the same. It is appreciated that regeneration refers to other forms of employment too.

The plan also estimates an increase of 3,836 workers over the plan period, to be made up from increases in local population and inward commuters. At a UDP job density this equates to a requirement of 77 hectares of land (obviously different from the 160+

The SEWSPG Housing Apportionment exercise (referenced in paragraph 4.3.3 of the PDP) is a working hypothesis agreed between 10 Local Planning Authorities in South East Wales. The apportionment to Bridgend was used in broadly assessing growth options for the LDP, however it was not the determining factor (See Appendix C of PDP).

Welsh Assembly Government cont.

hectares based on past build rates), but a predicted sectoral change in the economy could lead to higher densities over the LDP period. The preferred Population and Household Trend based Growth Option predicts a population increase of 9,774 by 2021 of which 1,283 participate in economic activity. However, the latter figure is somewhat lower than Cambridge Econometrics predicted 3,846 increase in workers, which raises the issue of where the difference is coming from. As the document acknowledges (pages 79 and 80), such a difference could be made up for by additional commuting into the Borough or by increased employment rates, particularly in the 18-25 age group. However, the former would be unsustainable and it is questionable whether the latter would be realistic, given there have been initiatives operating in the past.

Looking forward over a 15 year period these figures are difficult to assess with any accuracy. There is of course the added factor that the economy is presently in a recession and it is not clear how hard this will affect certain areas or how long it will take to return to a more buoyant position.

Strategic employment sites are identified and represented on the Strategic Diagram.

There is a general underlying concern about whether the choice of the Trend Based Growth Option suitably reflects aspirations for economic growth in the sub-region.

Table 9.1 would have been more meaningful for consultation purposes on the Preferred Spatial Strategy if there was an attempt to provide a broad breakdown of the level of housing units/employment land envisaged in each sub-area rather than simply whether it will mean breaking out of existing settlement boundaries or not.

- **Suggested Action:**

- The Deposit LDP and its evidence base should;**

- **provide robust evidence to support the chosen employment growth option;**
 - **identify any strategic employment sites;**
 - **be robust and realistic in terms of employment land allocations and their deliverability;**
 - **clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas;**
 - **provide greater evidence to justify a policy shift to increase prosperity in the more deprived areas through greater articulation of regeneration activities, bringing labour back into the workforce, skills training and market analysis demonstrating a viable future;**
 - **ensure flexibility to adapt to the cyclical economy;**

The Council agrees that the Deposit LDP should be based on a sound evidence base and that the Preferred Strategy is sufficiently flexible and deliverable. **The Council will ensure all the identified actions are considered, implemented and developed through a robust evidence base for the Deposit LDP and its supporting documentation.**

Welsh Assembly Government cont.

- **ensure the Plan is deliverable.**

Housing (page 118-122 & policy SP13)

The Preferred Strategy aims to meet the identified housing needs of Bridgend and to ensure that a significant proportion is affordable housing. However, the authority's Local Housing Market Assessment (LHMA) is not due to be completed until later in 2009. The current evidence base is their 2006 Local Housing Needs Assessment which indicates an annual affordable housing requirement of 636 homes. This compares with an annual average build rate for both market and affordable housing of approximately 500 units and the 2007 Joint Housing Land Availability Study estimate of the provision of 84 affordable homes per annum up to 2012. Bridgend state that they are awaiting the results of the 2009 LHMA before establishing their affordable housing target. The Preferred Strategy therefore establishes a growth option without taking this critical information into account, whereas other growth options might result in a higher housing figure which would provide greater scope for the delivery of affordable housing.

Bridgend also state that they will be reviewing their affordable housing threshold and quotas (currently 15 units and 15% and 30% respectively). However, about 70% of the plan's housing requirement is to be delivered on committed sites. The Preferred Strategy recognises that the planning system alone will not be able to meet the affordable housing requirement, but due to the lack of up-to-date evidence it is unclear how the plan will reconcile the position to enable it to meet the objective of meeting identified need.

A review of the growth options may be required, alongside the proposed review of the threshold and quotas and a review of the sites in the land supply. A low or medium growth option (albeit higher than the trend based option 3) may have matched the scores of the trend based growth option or even bettered them given a higher housing figure would provide greater scope for the delivery of affordable housing, (through additional allocations) and it would more closely reflect economic growth aspirations. (Paragraph D2.16 in Appendix D appears to acknowledge these potential benefits).

Also comparisons of the 'High' and 'Very high' growth options with the housing apportionment figure (500 dpa) and the resulting comments that they 'significantly exceed' it, is naturally skewed by the fact the apportionment figure is below the past long term trend figure (540 dpa).

There does not appear to be any evidence of an assessment of the inter-relationship between the housing and employment land allocations and those of neighbouring

Welsh Assembly Government cont.

authorities.

- **Suggested Action:
The Deposit LDP should:**

- **provide robust housing figures which are adequately evidenced and supported by an up to date Local Housing Market Assessment;**
- **clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas;**
- **clarify and evidence that all the options for increasing the affordable housing target have been explored;**
- **identify and provide sufficient evidence to clarify the reasons for and viability of the thresholds chosen to deliver affordable housing.**

Retailing and Commercial Centres (policy SP11)

Bridgend CC wish to maintain a retail hierarchy based on the largest settlements i.e. Bridgend, Porthcawl and Maesteg Town Centres. Details are provided on town centre regeneration schemes.

It is unclear why there is an indicator concerning renewable energy schemes under this retail policy.

Transport (page 112 & policy SP3)

Policy SP3 Strategic Transport Planning Principles, introduces 8 strategic transport planning principles. It also lists 14 strategic transportation schemes as identified in the Regional Transport Plan. It is not clear as to how some of the proposals are deliverable in terms of a realistic likelihood that the necessary finance is, or will be, available and committed.

- **Suggested Action:
The Deposit LDP should reflect the RTP and provide clarity on deliverability.**

Gypsy and Travellers

Under sections 225 and 226 of the Housing Act 2004, local authorities have a duty to assess and consider the needs of Gypsy Travellers. There is no evidence of a Gypsy Travellers assessment being undertaken in the Preferred Strategy, as no reference is made to Gypsy Travellers. The Assembly Government is aware from Gypsy Traveller Count figures (which should be available to the Council) that an unauthorised site with 12 caravans within Bridgend was recorded.

The Council agrees that the Deposit LDP should be based on a sound evidence base. The Council will ensure all the identified actions are implemented and developed through the evidence base for the Deposit LDP and its supporting documentation. This will include supporting the Deposit LDP with an up to date Local Housing Market Assessment which is currently being prepared.

Furthermore it should be noted that since the publication of the Pre-Deposit Proposals, the Council has submitted to the WAG the Affordable Housing Delivery Statement which has a target delivery of 503 new affordable homes up to 2011 and an estimated 672 up to 2016, demonstrating that additional options for increasing affordable housing are being explored.

Indicator concerning renewable energy schemes to be deleted.

Noted.

Welsh Assembly Government cont.

- **Suggested Action:**
Provide evidence on how Gypsy Traveller needs are identified and addressed in the plan.

Infrastructure (Policy SP15)

The first part of the policy, which relates to planning obligations, should be phrased around developments addressing the infrastructure needs they create rather than providing “appropriate benefits”.

- **Suggested Action:**
To consider. Greater clarity on the type of infrastructure required, linkages to development, funding and phasing. Deliverability is critical.

Conservation of the Built and Historic Environment (page 112/113 & policy SP5)

It is considered that the Preferred Strategy document has taken adequate account of the historic environment. It is suggested that the policy should be worded “significant adverse impact” rather than “adverse impact” to allow more flexibility.

Suggested Action: To Consider

Landscape (page 112/113 & policy SP4 Conservation of the Natural Environment)

The relationship between protecting the landscape, and the proposed volume and location of development (including residential, tourism etc), could be explored further in the Deposit LDP. The importance of local landscape character should be considered. It is suggested that the policy should be worded “significant adverse impact” rather than “adverse impact” to allow more flexibility.

Suggested Action: To Consider

Nature Conservation and Biodiversity

The prominence given to valuing, promoting, sustaining and protecting the natural environment for the future is welcomed. Reference to the requirements of the Natural Environment and Rural Communities Act (2006) (NERC Act), in particular the biodiversity duty would support the plan's approach. Implementation will be the key factor determining how well the LDP achieves its aims regarding biodiversity, and detailed site based guidance, possibly through SPG, may be required.

- **Suggested Action:**
Consider referring to the NERC Act in the Deposit LDP.

An assessment regarding Gypsy and Traveller Accommodation has recently been commissioned. **The results and implications of this study will be included in the Deposit LDP.**

Agree to rephrase Policy SP15 to reflect this comment.

Agree to rephrase Policy SP5 to reflect this comment.

Agree to rephrase Policy SP4 to reflect this comment.

Noted – consideration will be given to this in the Deposit LDP.

Welsh Assembly Government cont.

Minerals (page 17, 52, 113 & 114 & policy SP6 Minerals Supply, SP7 Minerals Protection)

No new allocations are anticipated. This is in accord with the RTS, although the RTS does refer to the consideration of areas of search for high quality materials, and this should be assessed within the plan period.

Limestone

The proposals identify the safeguarding of high purity limestone around Cornelly Quarry and high PSV sandstone in the north of the County Borough. Additional limestone other than high purity and proximate to Cornelly should be safeguarded. The RTS refers to safeguarding limestone and sandstone, and it is important that these areas are not drawn too narrowly.

Sand and Gravel

Reference to the safeguarding of sand and gravel resources should also be made in section 4 to avoid any conflict with 9.2.34.

Coal

The reference to coal in 4.3.20 should refer to resources not reserves. Para 9.2.34 refers to the safeguarding of coal, but it is suggested that a paragraph should be added referring to the areas where coal working will not be acceptable over the plan period.

The reference to coal in the North suggests that none of the extensively worked primary resources will be protected. The evidence base should justify this.

It should be considered whether the absence of a development management policy on extraction will lead to difficulties – consider extensions, sand and gravel, vernacular building stone, pre-extraction of coal, borrow pits, There is no proposal for SPG on minerals which could potentially leave a gap.

With reference to the transport of minerals, do any rail links or wharves need to be protected?

Policy SP6

Regarding the landbank, it is suggested that hardrock should be added. There may be wider needs for minerals supply other than for local and regional needs and the policy should not be restrictive.

Welsh Assembly Government cont.

Policy SP7

This policy refers to minerals generically, whereas the following buffer zones vary for the type of mineral. A 500m buffer zone should be shown for coal sites, 200m for hard rock quarries, 100m for sand and gravel.

Policy SP13

It is noted that the following strategic sites are identified for residential development:

Parc Derwen, Bridgend
Maesteg Washery
Coegnant Colliery
Porthcawl Waterfront

Are any of these sites on areas for minerals safeguarding? If so, it needs to be clear what factors will determine the decisions.

- **Suggested Action:**

- The Deposit LDP should:**

- **adequately safeguard mineral resources in line with national policy;**
- **identify the appropriate Buffer Zones on the proposals map and include a policy;**
- **ensure references are made to coal resources not reserves;**
- **Clarify areas where coal working will not be acceptable over the plan period;**
- **Consider the inclusion of a development management policy on coal extraction and SPG on minerals;**
- **Consider the transportation of minerals.**

Waste (page 114 & policy SP8 waste management)

Five sites are also identified for up to four waste treatment facilities in policy SP8 to meet regionally identified need. The deposit LDP should clarify the regional search criteria and clarify the principles of sustainable waste management contained in the policy.

The Preferred Strategy states “at present there is no landfill capacity within the County Borough and this issue will need to be the subject of further assessment in the Deposit LDP”.

- **Suggested Action:**

- Ensure Deposit LDP is sufficiently robust.**

These issues will be considered for inclusion in the Deposit LDP.

Agree that references should be made to coal resources not reserves in the Deposit LDP.

Noted.

Welsh Assembly Government cont.

Climate Change

While Climate Change is given due consideration in the draft Preferred Strategy further explanation of how the LDP responds to the effects of Climate Change on the county and how this will affect the strategy is recommended for the Deposit LDP.

- **Suggested Action:**
Ensure clarity in the Deposit LDP.

Renewable Energy (Policy SP9)

A policy is included on Energy Generation and Conservation (policy SP9). It is suggested that the policy should be worded “significant adverse impact” rather than “adverse impact” to allow more flexibility.

Water and flooding

The Preferred Strategy states (para 3.3.13) that “according to the EAW’s flood risk maps, human health and property in the southern parts of Bridgend town, the Ewenny Valley upstream to Pencoed and the valley towns of Maesteg and Ogmore Vale are at ‘significant risk’ of flooding. Parts of Porthcawl and the coast are also at risk from tidal inundation and storm surges.”

- **Suggested Action:**
To note and ensure development is directed away from areas at significant risk of flooding.

It is unclear how flooding and inundation have been addressed by the strategy and the impact of flooding on the proposed strategic sites. It is noted that a number of strategic sites are located in flood zones C1 and C2 yet it is unclear how the issue of flooding will be addressed and what mitigation measures will be in place to reduce the impact of potential flooding.

The authority should follow the precautionary approach as set out in TAN 15, and direct new development away from those areas which are at high risk of flooding. “Allocations should only be made in zone C if it can be justified that a development has to be located there in accordance with TAN 15 and if the consequences of a flooding event can be effectively managed.

Water Quality

(para 3.3.14) It is stated that surface water quality of several rivers may fail objectives of the Water Framework Directive, (WFD) especially where river

Noted.

Agree to rephrase Policy SP9 to reflect this comment.

The Council considers that flooding is an important issue when considering future land uses and is undertaking a Strategic Flood Consequences Assessment to inform the Deposit LDP.

Welsh Assembly Government cont.

courses have been artificially changed in towns and villages, and where they are polluted from agricultural and industrial discharges. It is also stated that three ground water locations are 'at risk' or 'probably at risk' of failing the WFD.

- **Suggested Action:**
The WFD is European legislation and should be addressed accordingly.

Water infrastructure

Ensure that adequate evidence is provided to ensure that there is sufficient resource available to deal with additional demand for water. Early engagement with Dwr Cymru is recommended.

- **Suggested Action:**
Ensure adequate evidence. The deposit plan should address the issues in relation to increased demand for water. Early engagement with Dwr Cymru.

Land contamination (page 18)

The outcomes of the review of contaminated land inspection is awaited to identify whether this will be a significant issue in terms of delivery. National planning policy advises that the nature, scale and extent of contamination, which may pose a risk to human health, should be considered as part of plan preparation to ensure that development is not undertaken without an understanding of the risks. Some understanding of the scope to overcome any actual or potential contamination may be a necessary part of understanding the risks if this is to impact on delivery.

- **Suggested Action:**
Consider for Deposit LDP

Agricultural land

There are no issues of consistency with the national planning policy requirement to conserve the best and most versatile agricultural land (PPW para 2.8.1).

Suggested Action: To Note

Design (policy SP2 Sustainable Place Making Principles)

Assume that the deposit plan will clarify if there are parts of the area that need specific LPA guidance regarding what will be required in design statements (e.g. town centre), and any information on SPG (development briefs, masterplans etc).

Noted.

The Council agrees that the Deposit LDP should be based on a sound evidence base. The Council are having continued discussions with Dwr Cymru and Environment Agency to inform the Deposit LDP and its evidence base.

Noted.

Welsh Assembly Government cont.

- **Suggested Action:**
Consider for Deposit LDP

Welsh Language

Consideration should be given to whether the Welsh language should feature in any of the LDP objectives, taking account of PPW paragraph 2.10.2.

- **Suggested Action: To consider**

A monitoring framework is at section 9 which sets out indicators and targets for the majority of the strategic policies.

SP1/2: The monitoring target should perhaps be 100% compliance with EAW advice, rather than 95-100%.

- **Suggested Action:**
Ensure the monitoring and implementation framework will be satisfactory for measuring the effectiveness of the plan strategy and policies. (+ see LDP Manual para 9.5)

The Deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.

It is indicated that implementation will be dealt with in more detail in the deposit version of the plan.

- **Suggested Action:**
Particularly important will be ensuring that the significant developments identified can be delivered, including clarification of timescales. Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.

Ensure the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.

Noted.

Noted.

Noted.

Site viability and deliverability will be an important factor when allocating sites for development in the Deposit LDP, the Council will be undertaking site viability assessments to inform this process. In addition the Council is currently working in partnership with the relevant delivery agents to progress significant developments and inform the Deposit LDP.

ENVIRONMENT AGENCY

Chapter 3 - The Spatial Context (Page 12)

3.3.13 - 'According to the Environment Agency Wales (EAW's) flood risk maps'. This statement should be changed to 'According to the Welsh Assembly Governments Development Advice Maps (DAM) including along with supporting evidence from a Strategic Flood Consequence Assessment'.

Bridgend Town, Ewenny, Maesteg and Ogmores Vale are stated as being at significant risk of flooding within the plan - we would agree with this statement. These areas however have also been earmarked as Key Strategic Growth Areas. We would highly recommend for the soundness of the plan that Strategic Flood Consequence Assessments (SFCA) are undertaken. TAN15 advises that the Development Advice

Maps are to be used to identify where flood risk is a strategic issue. However the Local Planning Authority (LPA) needs to provide justification in the form of a broad level assessment of the consequences of flooding where allocations are required in areas of high risk.

3.3.14 - The paragraph states that 'surface water quality of several rivers' the wording should be changed to 'the water quality of several rivers'. It is also stated that several of the rivers in the area may fail the Water Framework Directive (WFD). From our data there are several stretches and water bodies which are already failing and these include the Llynfi, Ogmores, Blackmill, Kenfig and Kenfig Pool.

The paragraph also states that the Ogmores and Llynfi are at risk from point source pollution but improvements in the waste water treatment works has improved this situation. Welsh Water should be consulted to determine whether these improvements will support additional development.

From our data the Ogmores and Llynfi are failing due to the cumulative effect of the Georgia Pacific Paper Mill discharge and the Lletty Brongu Treatment Works. However, improvements undertaken at the Paper Mill have improved the situation.

3.3.15 - 'Kenfig Pool is probably not at risk', this statement is incorrect. According to the WFD, Kenfig Pool is currently failing due to nutrient pollution.

3.3.16 - Clarification is needed on where these groundwaters are located. The groundwaters are stated as failing but this hasn't been raised as an issue and has also not been taken through to the objectives. This can be included as part of OBJ 2b (page 68).

Information will be used to inform the Deposit LDP.

The Council considers that flooding is an important issue when considering future land uses and is undertaking a Strategic Flood Consequences Assessment to inform the Deposit LDP.

Information will be used to inform the Deposit LDP.

Agree to change wording of Objective 2b.

Ongoing discussions with Welsh Water are taking place and will inform the Deposit LDP.

Noted.

Information will be used to inform the Deposit LDP.

Agree to change of wording of Objective 2b.

<p>Environment Agency cont.</p> <p>This section also states that ‘water resources are abundant but should be kept under review’, this issue isn’t taken through to the objectives. We would wish to clarify that even though there are no public water supply issues in Bridgend County Borough there are issues with water abstractions from the Llynfi, Ogmore and Ewenny. Your Authority will need to consider the type of industry to be located along these stretches.</p> <p>3.3.17 - This paragraph needs clarification. It is stated that air quality is good and should improve due to cleaner technology, particularly cars. However, later in the same paragraph it is stated that there is a risk of poor air quality from the M4.</p>	<p>Ongoing discussions with Dwr Cymru are taking place to inform the Deposit LDP.</p> <p>Local Air Quality Management and Assessment currently being updated which will inform the Deposit LDP.</p>
<p>The Natura 2000 sites have exceeded the Acid Critical Loads. Your Authority should investigate this issue in more detail with an assessment under the Conservation (Natural Habitats &c.) Regulations 1994, (the Habitat Regulations).</p> <p>3.3.21, 3.3.22, 3.3.23 - These paragraphs cover evidence and data. They refer to waste arising in 2001; the source of the data is the SW Wales Regional Waste Plan (RWP). Construction and demolition wastes are highlighted as the largest waste stream, followed by commercial and industrial waste then municipal wastes. No information is provided on how wastes other than municipal wastes are managed nor to current waste management provision/capacity in the Bridgend County area. The Local Authorities have recently been provided with a CD (Waste Data Interrogator 2007) containing data on wastes managed in their area. The plan should always be based on the most current up to date information.</p> <p>The plan does give further consideration to municipal wastes and there is heavy reliance on the MREC facility located in Neath Port Talbot. Whilst the Local Authority may be performing well against current targets, all local authorities will need to increase recycling of their municipal wastes stream to 70% by 2025 from a current performance of some 30-40%. It is unlikely that this can be accommodated within the current facilities as there will be a requirement to recover 18% of their municipal wastes as food wastes - this will require new facilities, i.e. anaerobic digestion plant.</p> <p>There needs to be more detailed consideration of the current picture, what wastes are arising and how they are being managed, what else is happening in neighbouring authorities and future needs with appropriate tie into the RWP.</p> <p>3.3.24 - What are the outcomes of the review? There is no further mention of contaminated land within the plan and it hasn’t been taken through to the objectives.</p> <p>Chapter 4 - The National, Regional & Local Policy Context</p>	<p>Noted.</p> <p>Revised figures will be included in the Waste background paper to support the Deposit LDP and its and detailed waste policies.</p> <p>The Council is part of a consortium investigating the preferred location for a sub regional facility. This will be referred to in the Deposit LDP.</p> <p>This will be included in the Deposit LDP stage.</p> <p>This is a matter which will be covered by the Public Protection department under other legislation. The outcome of the review and other emerging evidence will be considered at the Deposit LDP allocation stage on a site by site basis to inform viability.</p>

<p>Environment Agency cont.</p> <p>4.3.16, 4.3.17 - These paragraphs consider the spatial element. The plan does identify potential locations for waste sites, but appears to imply that further waste policies will be formulated in the light of the 1st Review of the RWP – this was signed off in late 2008.</p> <p>The RWP suggests that there will be a need for further landfill capacity for both inert and hazardous wastes in SW Wales by 2013. The Plan says that these needs will be subject of “collaborative working” to facilitate such provision but it is unclear as to how and when this work will be undertaken?</p>	<p>The issue of collaborative working will be covered in the Waste background paper which will be prepared as part of the Deposit stage.</p>
<p>What policy needs have been identified further to agreement of the RWP 1st? What is going to the mechanism to consider landfill needs?</p> <p>Chapter 5 - The Key National, Regional & Local Needs & Issues</p> <p>5.2.1 - LS7 - The issue states that there is no significant landfill capacity within Bridgend County Borough. This issue needs to be given more weight within objective 2d (page 68) and SP2 (page 127).</p> <p>Chapter 6 - Vision and Objectives</p> <p>Objective 2 - To protect and enhance the Environment (page 68)</p> <p>OBJ 2b - ‘To tackle the sources of poor surface water and air quality’. The objective mentions nothing about other water bodies such as groundwaters which were flagged as failing in Chapter 3. The objective also doesn’t mention soils. The wording of the objective could be altered to read ‘To safeguard and improve the quality of water, air and soil’.</p> <p>OBJ 2c - ‘To manage development in order to reduce or mitigate against the risk and fear of flooding’. The wording of this objective is not strong enough, it could be changed to ‘To manage development in order to avoid and minimize the risk of flooding both to the development and third parties’.</p> <p>OBJ 2e - ‘To contribute towards the energy needs of Wales with a focus on the promotion of renewable energy’. We would request that the wording be amended to ‘To substantially contribute’.</p>	<p>An assessment of the possible provision for landfill other than household waste will be undertaken and the results included in the Waste background paper. Residual waste from household waste processing at the MREC is disposed mainly at the Pwllfawtkin site in Neath.</p> <p>Regional landfill capacity is the subject of ongoing collaborative working and assessment.</p> <p>Agree to rephrase objective 2b to include reference to land quality if further evidence supports this.</p> <p>Agree to rephrase objective 2c by replacing, reduce or mitigate by avoid or minimise.</p>

<p>Environment Agency cont.</p> <p>Additional Issues</p> <p>Areas of concern to EAW, which have not been included within the issues or objectives, are as follows:</p> <p>Water resources need to be managed sustainably.</p> <p>Contaminated land and the remediation of such land should be included.</p> <p>To develop Brownfield sites in preference to Greenfield sites where appropriate.</p> <p>Although infrastructure is mentioned within the document there is no specific mention of sewage infrastructure.</p>	<p>This is a matter which will be covered by the Public Protection department under other legislation. The outcome of the contaminated land review and other emerging evidence will be considered at the allocation Deposit LDP stage and inform viability.</p> <p>The preference for brown field sites over green field is an inherent part of the Regeneration led Spatial Strategy.</p> <p>Strategic Policy SP2 states “Incorporating appropriate arrangements for the disposal of foul sewage, waste and water”.</p>
<p>Biodiversity – taking opportunities to restore habitats. For example, de-canalising and de-culverting watercourses.</p> <p>Climate change and strategies to adapt to this for the future.</p> <p>Chapter 9 – Preferred Strategy including Strategic Policies</p> <p>To protect and enhance the Environment (Page 112)</p> <p>The text highlighted in green states;</p> <p>‘The Strategy requires the protection of sites and buildings of acknowledged natural, built and historic interest’.</p> <p>As covered in the heading we would request that the word ‘enhancement’ is included within the above statement.</p> <p>9.2.30 - In the third sentence of this paragraph the word ‘overriding’ should be included before public interest. We would also want to see Sites of Importance for Nature Conservation (SINCs), Local Nature Reserves (LNRs) and UK Priority Habitats added to the list.</p> <p>9.2.31 - This paragraph states that the landscape quality will be maintained and enhanced wherever possible. To this we would also request that the protection of river</p>	<p>Noted for possible inclusion on a site by site basis for the Deposit LDP.</p> <p>Noted for possible amendment.</p> <p>Noted for possible amendment.</p> <p>Noted for possible amendment.</p> <p>Noted for possible inclusion as policy in the Deposit LDP but distinct from</p>

<p>Environment Agency cont.</p> <p>corridors is included in order to safeguard and promote connectivity between sites/areas; which in turn would safeguard species migration routes due to climate change.</p> <p>9.2.35, 9.2.36, 9.3.37 - These paragraphs fairly represent the position described in the RWP and the provision of four new strategic waste treatment facilities. These allocations should be flexible to ensure the suitability of the sites to house different treatment facilities.</p> <p>Consideration needs to be given to smaller scale activities such as community composting, reprocessing/recycling schemes.</p> <p>9.2.79 - There are already problems with an ageing sewerage system however this has not been raised as a specific issue in previous chapters. Are improvements planned? This should be checked with Welsh Water and a strategy put in place supported by objectives and policies (i.e. within SP15).</p> <p>9.3 - Strategic Policies</p>	<p>landscape quality.</p> <p>Noted.</p> <p>Noted for possible inclusion in Deposit LDP.</p> <p>Noted - Ongoing discussions with Welsh Water is taking place.</p>
<p>SP2 - Sustainable Place Making Principles (page 127)</p> <p>The 7th bullet point states ‘Minimising and/or mitigating against the pollution of air and water’. This policy needs to be stronger and as raised in OBJ2 to include soils. The policy can read, ‘Avoiding or minimising the pollution of water, air and soils’.</p> <p>The 8th bullet point should be split into two separate issues. The first should read ‘Avoiding or minimising the risk of flooding’, and the second ‘Promote the use of sustainable drainage systems (SUDS) in order to reduce surface water flooding and infiltration of the sewerage system’.</p> <p>Indicators</p> <p>We recommend that the first indicator be changed to read ‘Number of planning permissions granted contrary to the advice of the Environment Agency’, this should be on any grounds not just flood risk and water quality.</p> <p>Sustainability Factors and Equalities Assessment – what does this involve and how will targets be set?</p> <p>SP3 - Strategic Transport Planning Principles (page 128)</p>	<p>Noted for possible amendment.</p> <p>Consider that one point is sufficient. Cannot place too much emphasis on SUDS as site conditions may not be conducive to implementation in all cases. Will add the word ‘promotion’ of the use of SUDS to reflect this.</p> <p>Noted.</p> <p>Sustainability factors will become more evident in emerging SPG. Equalities Assessment to be considered for LDP to comply with emerging equalities regulations.</p>

Environment Agency cont.

EAW would support the proposals for sustainable travel improvements.

SP4 - Conservation of the Natural Environment (page 129)

The title of this policy should also include the enhancement of the natural environment as well as conservation.

The words protect and improve could be removed from the first paragraph as they are just reiterating conserve and enhance which are strong enough.

Integrity of the countryside – what does this mean?

We would want the list of strategically important areas to include SINCs, LNRs and UK Priority Habitats.

Indicators

We feel this monitoring is inadequate. Additional indicators could include fish stock monitoring (EAW could provide data) and hectares of UK Priority Habitats lost to development per annum.

SP8 - Waste Management (page 131)

Village Farm and Brynmenyn Industrial Estates are both within flood zones therefore they may not be appropriate for such a facility and alternative may be Bridgend Industrial Estate. It has good transport routes and isn't located within a flood zone.

The classification of these sites will need to be flexible to allow for different types of waste facilities.

SP9 - Energy Generation and Conservation (page 132)

EAW supports this policy and encourages the inclusion of alternative forms of energy generation i.e. biomass, ground source heat pumps, hydropower, etc.

Indicator

We would suggest that the local target to be set higher than the National target.

SP13 - Housing (page 134)

Parc Derwen, we understand that this development has already been approved but

Noted.

Noted for possible amendment.

Noted for possible amendment.

'Integrity' relates to the protection of the countryside for the countryside's sake in accordance with national policy.

By definition these are more locally important sites. UK Priority Habitats are covered in HRA.

Noted for consideration.

Noted. Only parts of the industrial estates mentioned are in the floodzone. Consequently any proposals will take this into account. This will be considered further and amendments made as appropriate.

Noted.

Noted.

Targets will be confirmed in the Deposit LDP.

<p>Environment Agency cont.</p> <p>your Authority should be aware that there are still outstanding surface water issues associated with the site.</p> <p>Should you wish to pursue the Maesteg Washery site, SUDS will need to be incorporated and consideration given to the sewage infrastructure.</p> <p>Coegnant Colliery, this site has been reclaimed but has not been remediated. Any potential developer would need to be made aware of this issue.</p> <p>The Porthcawl Waterfront development has the potential to compromise the Kenfig SAC. Pollution prevention during the construction phase is paramount.</p> <p>SP14 - Community Uses (page 135) Cemeteries - Your Authority should be made aware that if there is provision for a new cemetery or extension to an existing cemetery within the plan there are certain constraints to its location. The cemetery cannot be located upon a major aquifer or source protection zone, it must be a minimum of 250m from any potable groundwater supply source, 30m from any watercourse/spring and 10m from any field drains. All of these factors should be taken into consideration during site allocations, which must be included within the deposit plan.</p> <p>SP15 - Infrastructure (page136) As water quality is an issue within Bridgend County Borough we would require reference to the provision of adequate sewage infrastructure to be included within this policy.</p> <p>Your Authority should be made aware that the Environment Agency's Corporate Strategy is currently under review. The strategy will highlight our key areas of work over the next five years (2010-2015) and will give you some background as to why we have raised certain issues/topics. It may be prudent to include this within the 'Other Plans and Strategies' section.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p> <p>The relevant AA relating to Porthcawl Waterfront did not reveal this as a potential threat.</p> <p>Noted as matter for consideration in the Deposit LDP.</p> <p>Sewerage Infrastructure Capacity and relationship to surface drainage issues and flooding will be acknowledged in Deposit LDP and considered on a partnership basis. SFCA and pilot study analysis will also further inform Deposit LDP.</p> <p>Noted.</p>
<p>DWR CYMRU WELSH WATER</p> <p>Strategic Policy SP15 identifies specific topics for inclusion within a legal agreement but excludes 'water and sewerage infrastructure'. These are essential components for development. Where a developers needs does not align with a water company's investment programme, then it is reasonable for these essential services to be acquired via a unilateral agreement of the Town and Country Planning Act. We request the inclusion of 'water and sewerage infrastructure' within this policy.</p>	<p>Water company's investment programme will inform Deposit LDP and be taken into account in terms of viability, deliverability and phasing of developments.</p>

COUNTRYSIDE COUNCIL FOR WALES

CCW welcomes and supports the work that has been undertaken so far in the preparation of the LDP and particularly welcomes the strategic LDP objective to protect and enhance the environment.

However, we do have some general concerns, which are summarised below.

We welcome the aim to focus development on principal towns and key settlements to reinforce their role, providing this aim is considered in the context of sustainability as a whole with the relevant emphasis given to the protection and enhancement of the environment and natural heritage. Proposals should be sensitively integrated with the quality natural and built heritage features that many of the settlements and their surrounding environment possess. This aim should also look to secure an integrated transport network to reduce people's reliance on the car as their mode of transport to access facilities/ jobs etc.

Whilst supporting the identified vision for sustainable, healthy and inclusive network of communities, CCW notes with concern that the Draft LDP Vision aspiration of "protecting and enhancing the environment" (Report to Extraordinary Council, 29 November 2007, Appendix C) is absent in the Preferred Strategy LDP Vision, and we seek further clarification for this omission. Given the variety and quality of natural heritage interests within the county borough, that provide a sense of place and important social and economic benefits to the county, we consider the protection and enhancement of the environment, a serious omission from the vision.

As currently drafted, CCW does not consider that the Vision achieves the balance between economic, social and environmental objectives that is recommended in 'LDP Manual' (2006, section 5.5).

CCW welcome the protection proposed for acknowledged natural history interest within the LDP Strategy, but suggest that this needs to include mention of all designated sites, international, national, and local importance.

As a general observation there are a number of statements within the document where the language used may not be easily understood by laypersons or the general public. CCW would therefore recommend that the document is more in line with use of Plain English guidelines.

CCW added several detailed comments in the form of annexes to their general representations. These are helpful, and will be taken on board where practicable.

The Council does not favour use of the term 'natural heritage' in the same sense as the 'built heritage' as this implies that what we have inherited limits what we can achieve for the future. **This will be clarified in the Deposit LDP.**

The Council will consider reference to the environment in the vision to acknowledge the flow to the high level objective to protect and enhance the environment.

Sites of local importance will be considered for inclusion as policy in the Deposit LDP, including recognising the importance of wildlife corridors for connectivity of habitats important to protected species.

Noted.

CCW have concerns about how the SA / SEA and HRA processes have been integrated into the plan making process to date. This will be better acknowledged in the further consultation report which will also include a 'change log' as suggested by our consultants to support the deposit Plan and the full SA / SEA and HRA. In this regard the Council will be guided and are working closely with consultants Baker Associates who have been commissioned for this purpose.

	<p>Porthcawl 'Waterfront' is the subject of adopted SPG and a matter of public accountability and due process. The relevant AA relating to Porthcawl Regeneration did not reveal any threat to SACs and the Council consider the work is sufficiently robust to satisfy HRA regulations.</p> <p>CCW were concerned over the process for HRA Screening especially in respect of air quality issues, the buffer zones of 15km around SACs, and 'in combination' effects regarding resources e.g. water. The Council agree to consult with CCW regarding the Consultation and SA / SEA and HRA Reports before it formally publishes them for statutory consultation in order to clarify any risks in the regional resource context.</p>
<p>VALE OF GLAMORGAN COUNCIL</p> <p>The Vale of Glamorgan Council supports the LDP core strategy and considers that it represents a logical approach for the management of development that will address the issues and needs within the authority.</p> <p>Proposed Change N/A</p> <p>Paragraphs 4.3.1 to 4.3.4 (a) Housing Apportionment</p> <p>The Vale of Glamorgan Council supports the proposed housing requirement figure identified within the pre-deposit proposals, which is generally consistent with the apportionment process undertaken by SEWSPG.</p> <p>Proposed Change: N/A</p> <p>Paragraph 4.3.9 (d) - Special Landscape Area Designation</p> <p>The Vale of Glamorgan Council supports the proposal to ensure cross boundary consistency of SLA designations. In this regard, the Council has undertaken a review of its Special Landscape Areas as part of its LDP background evidence. The boundary of the existing Castle Upon alun SLA which adjoins the boundary of BCBC has not been affected by this review.</p> <p>Proposed Change: N/A -----</p> <p>Paragraphs 4.4.2 to 4.4.4.</p> <p>Linkages with Adjoining Local Authority Areas</p>	<p>Noted.</p> <p>Noted.</p> <p>The existing Special Landscape Areas of the County Borough are currently being reviewed against a regionally-agreed methodology using data from LANDMAP. Adjoining Local Authorities will be consulted as part of this process to maintain cross boundary consistency. The updated areas will then be included within the Deposit LDP.</p>

Vale of Glamorgan cont.

Paragraph 9.2.16 Brocastle Waterton

The proposed Brocastle Link Road connects the A473 with A48 and a section passes through the western part of the Vale of Glamorgan. The route has been formally submitted as a candidate site to the Council by BCBC. In addition, BCBC raised an objection to the Council's Draft Preferred Strategy as there was no reference to the new road proposal. However, as the Council has not assessed its candidate sites it is considered premature for either authority to include it within their Pre-Deposit Proposals documents.

Paragraph 4.4.4. - states that the Brocastle Link Road will provide improve access to the proposed St. Athan development "as well as being a vital component in realising the development opportunities at the Brocastle employment site and Waterton Industrial Estate, this scheme is equally important to improve access to Cardiff Airport." Whilst it is accepted that the new road will help to reduce pressure on the existing Waterton roundabout it will increase pressure on the A48 at Brocastle. Furthermore, the Council feels that the references to St. Athan and the airport in terms of justification are tenuous.

Proposed Change: Provide further supporting evidence to justify the need for this proposal.

Map 10 - Strategic Diagram

The identification of a strategic cycle route on the A48 is noted. However, the Council has no current plans to develop cycle routes along the A48 that might link with this proposal.

Proposed Change: Delete reference on the strategic diagram to the strategic cycle link on the A48.

Map 10 - Strategic Diagram

The Strategic diagram indicates a strategic cycle link into the Vale of Glamorgan via the A48. However, the Sustrans feasibility study shows a route that would link the NCN in Cardiff with that in Bridgend via links at Ewenny Priory.

Proposed change: Amend strategic diagram to show the proposed NCN route as a strategic cycle link.

The Brocastle link is considered to be important to the status and accessibility of the Strategic Employment site at Brocastle and the wider accessibility of the Strategic Regeneration Growth Area to the east of Bridgend. This is in addition to providing better links to St Athan and Cardiff Airport. A proposed new masterplanning exercise for Brocastle by WAG is likely to consider its role further and provide the relevant supporting evidence.

The proposed cycle route along the A48 serves as a strategic link between the two adjacent territories and its retention provides a strategic cycle route for future local cycle routes to be linked.

Noted.

<p>Vale of Glamorgan cont.</p> <p>Policy SP8 - Waste Management</p> <p>The identification of sites for the development of regional waste sites is welcomed. However it is unclear within the policy as to whether the sites identified are of sufficient size to meet the land requirements identified within the South East Regional Waste Plan, or the extent to which other sites will be relied upon to meet the land take required.</p> <p>Proposed change: Amend Policy SP8 to include the amount of land allocated / available for waste management facilities at the sites identified.</p> <p>Policy SP13 - Housing</p> <p>The Pre-Deposit Proposals document states that the Council has undertaken a Local Housing Market Assessment which has identified a need for the provision of affordable housing, and the issue of affordable housing is cited within the spatial context as an issue for many of the sub areas. However, Policy SP13 does not provide and indication of the number of affordable houses that will be sought during the LDP period. Whilst reference is made to a target being set in the LDP, the identification of affordable housing as an area wide issue arguably warrants the inclusion of a strategic policy for affordable housing, or reference to it within Policy SP13.</p> <p>Proposed Change: Consider the inclusion of an affordable housing target within Policy SP13.</p>	<p>This will be a matter for the Deposit LDP.</p> <p>This will be a matter for the Deposit LDP and evidenced through an up-to-date LHMA.</p>
<p>WESTERN POWER DISTRIBUTION</p> <p>No specific comments given.</p>	
<p>NATIONAL GRID</p> <p>National Grid high voltage overhead lines exist in the vicinity of the following Strategic Regeneration Growth Areas, as identified by Chapter 9 of the Bridgend Pre-Deposit Local Development Plan: Abergarw Industrial Estate; Ogmor School; Bryncethin Depot; Parc Afon Ewenni.</p> <p>National Grid request that they are adequately consulted, and that the operating procedures and practices of National Grid are considered, during the formulation of all relevant planning policies. Information on the policies, operations and assets of National Grid, is contained within the covering letter which accompanies this representation form.</p>	<p>Noted.</p> <p>National Grid are a Specific Consultee and will be consulted at as part of the LDP preparation process.</p>

<p>CORNELLY COMMUNITY COUNCIL</p> <p>1. There is a need to continue protecting existing open spaces and play parks within settlements from development - particularly the Cornelly area.</p> <p>2. Transport - provide bus service to / past Kenfig Nature Reserve and surrounding area.</p> <p>3. The provision of a swimming pool as part of the regeneration of Porthcawl would benefit Cornelly and the surrounding area.</p>	<p>Ongoing work is currently being undertaken with respect to the Assessment of Open Space. The results of this analysis will be included in the Deposit LDP, in accordance with the requirement of TAN16.</p> <p>Decisions relating to bus service frequencies do not rest with the Council unless they are tied up with infrastructure enhancement.</p> <p>Scope is identified in the Seven Bays Project: Porthcawl Waterfront Supplementary Planning Guidance for incoming leisure proposals.</p>
<p>COYCHURCH HIGHER COMMUNITY COUNCIL</p> <p>There is very little information concerning the community of Coychurch Higher, which makes it difficult to comment, however, members are adamant that the green belt and environment, including the allotments must be protected and all building work maintained within the current building lines. Current infrastructure would be totally inadequate to support any significant development.</p> <p>Report does not indicate protection of wildlife many varieties of birds and habitat will be threatened should any development occur within this community.</p>	<p>The existing Special Landscape Areas of the County Borough are currently being reviewed against a regionally-agreed methodology using data from LANDMAP. These updated areas will be included within the Deposit LDP. Settlement Boundaries and Greenwedges will be reviewed to inform the LDP.</p> <p>The Pre-Deposit Proposals document identifies environmental issues throughout the document. Policy SP4 specifically requires the conservation and enhancement of biodiversity which will be further developed in the Deposit LDP.</p>
<p>LALESTON COMMUNITY COUNCIL</p> <p>I refer to the Page 135 - Preferred Strategy including Strategic Policies - SP14 Community Uses.</p> <p>With the development of the Broadlands housing estate, this Council has experienced a far greater demand for allotment provision - currently there are 18 applicants on the waiting list. The Council provides 40 allotment spaces but this year's renewal of annual rent resulted in no turnover in plots.</p> <p>Neighbouring land to the current allotments has been bought from the ex Mackworth Estates by Mr Williams of Margam Farm and he is not interested in leasing or selling land for allotments.</p> <p>As a long term project, is it possible please for BCBC, within the Local Development Plan, to identify land for recreational allotment use. With the present economic climate, demand will only increase.</p>	<p>The Council is currently undertaking an assessment of allotment land in the County Borough and is likely to develop an Allotment Strategy; as part of the wider assessment of Open Space, the results of this will be used to inform the Deposit LDP.</p>

<p>MERTHYR MAWR COMMUNITY COUNCIL</p> <p>1. We endorse the key objectives of the Pre-Deposit plan in terms of sustainability, the provision of high quality places to live and the protection of the environment.</p> <p>2. In relation to the MMCC area we reiterate that this is an area of high environmental quality which provides a green lung to the south of the town of Bridgend and includes many special areas such as the Heritage coast and MM dunes. We ask that that all decisions on land use to be included in the Deposit LDP reflect this.</p> <p>3. We note and endorse that the land at Island Farm set aside for employment use is retained as a special site for High Technology.</p> <p>4. We point out that the Inspector at the UDP Inquiry considered it essential that a land settlement boundary be included to the south of the island farm site and ask for this to be included in the Deposit plan.</p> <p>5. We have previously asked, and ask again, that the mineral land identification in the UDP south of Island Farm land be subject to sequential testing in the Borough if and when the land is subject to a planning application.</p>	<p>Noted.</p> <p>All national and regional environmental designations will be acknowledged in the Deposit LDP. The existing Special Landscape Areas of the County Borough are currently being reviewed against a regionally-agreed methodology using data from LANDMAP. These updated areas will be included within the Deposit LDP.</p> <p>Noted.</p> <p>There is an existing settlement boundary at this location designated by the adopted UDP. This, along with all settlement boundaries will be reviewed for inclusion within the Deposit LDP.</p> <p>This is a safeguarding area and is not an allocation. Hence any proposals would be considered against detailed mineral policies in the Deposit LDP.</p>
<p>NEWCASTLE HIGHER COMMUNITY COUNCIL</p> <p>Preferred Growth option Given the current circumstances it is suggested that growth will be much lower than the document assumes.</p> <p>Preferred Spatial Strategy This seems to be the fairest and most beneficial, according to your analysis.</p> <p>Further Comments Community Councillors wish to suggest the following: (all of equal importance).</p> <p>1. Essential to carry out road upgrading and improvements between Tondu and Maesteg on A4063 road. This is considered essential to the plans for future of Maesteg area.</p> <p>2. Suggest the retention of Pandy Infants school, Aberkenfig (after merge with Tondu School) as a preserved Listed Building for use by the Community.</p> <p>3. Suggest provision of a new access to Tondu primary school to relieve the congestion problems in West Street and Meadow Street, Aberkenfig.</p>	<p>It is acknowledged that the LDP will need to be flexible enough to respond to changing circumstances.</p> <p>Noted.</p> <p>Improvements to the A4063 between Sarn and Maesteg is one of the Strategic transportation schemes identified in SP3 of the Pre-Deposit Proposals.</p> <p>The outcomes of the land-use requirements of the School's Modernisation Programme will be taken into account in the Deposit LDP.</p> <p>Issues of this nature will be considered to inform the Deposit LDP.</p>

<p>Newcastle Higher Community Council cont.</p> <p>4. It is important to allow meaningful contributions from Community Council and the public.</p>	<p>Noted.</p>
<p>OGMORE VALLEY COMMUNITY COUNCIL</p> <p>Key national, regional and local needs and issues</p> <p>Commercial areas are needed in the Ogmore Valley.</p> <p>There is no plan for the washery site - Ogmore Vale that attracted money and was deemed unsafe some time ago only to lose out to the LG site. The shafts haven't even been capped.</p> <p>Preferred Strategy</p> <p>Ogmore Valley is losing ground economically to surrounding towns wouldn't strategy be better being economically led?</p> <p>Further Comments</p> <p>Cosmetic regeneration of the Ogmore Valley is needed. The High Street Ogmore Vale is boarded up.</p> <p>J36 needs a car park to promote car sharing etc. Cars are parked on the verges through a working week.</p> <p>A4061 is the only direct route - Why no diversion route for Valley?</p>	<p>A Review of Commercial Centres, their role, accessibility and their boundaries will be evidenced for the Deposit LDP.</p> <p>A Regeneration Strategy for the Ogmore Valley is shortly to be commissioned as part of the Rural Development Programme and will address particular issues concerning the area. If possible within the existing time-scales, the Deposit LDP will include the land use implications of this Strategy.</p> <p>The Economic Led Spatial Strategy Option Scored the least in terms of achieving all high level strategic objectives.</p> <p>The Council consider that the Regeneration Strategy which includes Valleys Gateway SRGA represents the main catalyst to assist in the regeneration of the wider area positively impacting upon the Ogmore Valley.</p> <p>As stated above a Regeneration Strategy for the Ogmore Valley is shortly to be commissioned as part of the Rural Development Programme and will address particular issues concerning the area. If possible within the existing time-scales, the Deposit LDP will include the land use implications of this Strategy.</p> <p>New park and share facilities at M4 junctions 35 & 36 are Strategic transportation schemes indentified in SP3 of the PDP. The park-and-ride site at Sarn near J36 is currently being considered for expansion to 40 spaces for train passengers to help reduce the length of car-borne journeys and encouraging sustainable travel for residents of Sarn. It is envisaged that this expanded facility will reduce the verge parking at J36. A proposal for a P&R facility at Pencoed could provide approximately 50 spaces adjacent to the station and is intended to encourage greater use of alternative methods of transport around the Pencoed area.</p> <p>Bypasses are another form of road building based on predict and provide. Although they may bring some environmental relief, the Council is mindful of the land-take and the environmental impact of bypasses. It is envisaged that policies</p>

	to encourage the use of public transport will help to keep traffic on the A4061 at manageable levels.
<p>PENCOED TOWN COUNCIL</p> <p>Would you please note that the members of Pencoed Town Council support the need for a second crossing over the main South Wales Railway line, as essential to the regeneration of Pencoed.</p>	<p>Issue LS12 of the PDP is derived from the current policy position under operation by the Council. It is for the LDP options to determine if it is a future priority to resolve this issue in the future by the allocation of new development which could fund the necessary improvements. There is a long term aspiration to close the level crossing at Pencoed and replace it with a widened bridge at Penprysg Road which would be development related or via third party funding.</p>

**Appendix 3: Table of responses from other Individuals /
Organisations**

Issues (including National, Regional and Local Policy context)

Comments relating to Policy and Context Review and Specific Issues

Summary of Representations Received by Issue	Council’s Initial Response and Identified Actions for Deposit LDP
<p>Settlement Role and Function</p> <ul style="list-style-type: none"> NR1 - Porthcawl and Pyle are two dissimilar places. Not a hub NR2 – (Bridgend as sub-regional centre) Difficult to fulfil as locations in Bridgend are dispersed and create additional travel especially to areas poorly served by Public Transport. Pencoed allocations: reference in 3.6.94 should expand to state "...to any development beyond existing commitments allowed for in the UDP". Recognises rationale for focusing development on hubs; there are flaws in relying on trickle down approach to community development, particularly the benefits to valley communities with poor transport. Support development of sub regional service centres as they could benefit Bettws by offering localised employment opportunities. <p>Tourism</p> <ul style="list-style-type: none"> Does not agree with LS 44 (Majority of visitors to CB only come for the day). <p>Wind Farms</p> <ul style="list-style-type: none"> Concern over NR7 and the potential that wind power developments has in sterilizing Coal reserves. Section 4.2 a contains very little information on the national policy context especially in comparison with section 4.2 b. Specific mention should be made of TAN8, presently the document refers to it as a regional matter. NR7 - We do not support wind power. 	<p>The status of Porthcawl and Pyle as a hub is reflective of the Wales Spatial Plan which the LDP must have regard to. This is true also of Bridgend’s role as a sub-regional centre. The Wales Spatial Plan aspirations for these settlements will be reflected in the Deposit LDP.</p> <p>At this stage, the LDP Pre-Deposit Proposals (PDP) document is setting out the current situation in Pencoed, therefore reference to future development is not appropriate.</p> <p>The principle of focusing development on hubs to spread prosperity is contained within the Wales Spatial Plan, the LDP PDP reflects this. However the Preferred Strategy also recognises the benefits of, and supports, smaller regeneration schemes in the Garw Valley. The Valleys Gateway has also been identified as a Strategic Regeneration Growth Area, in close proximity to Bettws.</p> <p>The evidence which the Council has (paragraph 3.5.10 of the LDP PDP) suggests that the issue identified is accurate. The objector does not provide their own evidence to counter this.</p> <p>The objector raises points regarding two land uses. It will be the role of the LDP to provide the policy framework in which balanced-decisions can be made on these two uses at the point of determining a planning application.</p> <p>LDPs should not repeat national policy; however such policy will be taken fully into account when developing locally-specific policies for the Deposit LDP. In terms of the objectors reference to not supporting wind power; national policy, including TAN8 requires the Council to provide policies for renewable energy (including wind power) in its LDP.</p>

Summary of Representations Received by Issue	Council's Initial Response and Identified Actions for Deposit LDP
<p>Open Space Assessment</p> <ul style="list-style-type: none"> The Council should undertake an appropriate open space assessment as required by TAN 16 and remove LS 4 until this has been completed. <p>Traffic / Transport</p> <ul style="list-style-type: none"> NR6 – (RTP) The provision of footpath developments included in the Rights Of Way Improvement Plan and links from the communities to railway stations and bus stops should be added. LS10 – (Poor air quality around M4) There is still poor noise quality adjacent to the M4 corridor which has not been reduced. LS26 – (Poor transport links to Garw) Links should be re-established to Tondy railway station. LS11 (road network) A4106 between Bridgend and Porthcawl - current traffic flows are considerable and will increase under the proposals. The road is substandard but not shown as requiring strategic improvement. 3.6.86 - problems with traffic accessing Kenfig IE at Junction 37 instead of 38. <p>Natural and Built Environmental Quality</p> <ul style="list-style-type: none"> LS3 – (built heritage) concerned about deterioration of Bridgend TC especially the upper floors. 3.2.4 - Garw Valley's pre-industrial heritage is also significant. 3.2.17 - Area to west of Bridgend CB at risk of poor air from industries. <p>Retail / Commercial / Community</p> <ul style="list-style-type: none"> 3.6.89 (Health facilities) bigger supply to serve increased population. 	<p>Ongoing work is currently being undertaken with respect to the Assessment of Open Space. The results of this analysis will be included in the Deposit LDP, in accordance with the requirement of TAN16.</p> <p>This issue reflects the need to identify at a strategic level schemes in the Regional Transport Plan in the LDP. More locally important schemes identified within the Rights of Way Improvement Plan will be considered for inclusion within the Deposit LDP.</p> <p>The European Noise Directive requires WAG to produce strategic noise maps for road, rail, and for major settlement areas. These noise maps are used to produce action plans to manage noise issues. WAG has now completed draft strategic noise maps for major roads, railways and the major urban areas of agglomerations. Implications arising from these will be taken account of in the Deposit LDP where appropriate.</p> <p>The suggested schemes are not included within the Regional Transport Plan and so cannot be included within the LDP Pre-Deposit. However, road improvements are identified as part of the Porthcawl Waterfront SPG and will be delivered as part of the regeneration of the area.</p> <p>Issue LS13 identifies this.</p> <p>Issue LS3 and the LDP generally seeks to protect the built environment. The Bridgend Regeneration Strategy and ongoing working within the town centre (THI etc.) seeks to improve the quality of the built fabric.</p> <p>This area of the County Borough has not been identified as being at risk from poor air quality. However the situation will continue to be monitored by the Council.</p> <p>The LDP will require all new development to take account of infrastructure requirements including, where identified, health facilities. Where identified the land-use requirements of health facilities will be earmarked in the Deposit LDP.</p>

Summary of Representations Received by Issue	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • LS41 – (A3 uses in Aberkenfig) This requires increase in car parking. • LS42 – (neighbourhood / community retail areas with community facilities) should include specific reference to "Places of Worship". • Great concern over deficiency of child's play area not average in North Cornelly / Pyle, also deficiencies identified in 3.3.9 in N Cornelly. <p>Employment Land</p> <ul style="list-style-type: none"> • Agree with issues but: Para 3.5.20 (employment land availability) - should confirm if land is available within existing settlements. • 3.6.7 (employment land reassessment) Location of other sites should be made known. <p>Minerals and Waste</p> <ul style="list-style-type: none"> • Civic Amenity Sites: no reference indicates any change to locations. • Disagree with NR11 (safeguarding). Opencast coal mining is not needed by the localities of Bridgend. Conflicts with health, wellbeing, social and environmental issues. Opencast coal mining is totally alien to the aspirations of the LDP for sustainable development, protection of local character, diversity and environment. 	<p>A Review of the role and accessibility of District Centres and their boundaries will be evidenced for the Deposit LDP. The provision of car parking spaces in all locations will be determined in line with land-use development and according to approved parking standards. It is envisaged that strategies to encourage reduced car use and promote walking and cycling will reduce the demand and need for parking spaces.</p> <p>Places of Worship are defined as Community Facilities in paragraph 9.2.73 of the LDP Pre-Deposit Proposals and will therefore be included in analysis of role and function.</p> <p>Ongoing work with respect to Open Space assessment will inform specific allocations in the Deposit LDP.</p> <p>It is not possible to confirm this as some existing employment sites are already outside of the settlement boundary which, after assessment, may continue to be allocated in the Deposit LDP.</p> <p>The location of these sites is outlined further in the document at table 9.2 (pg 116).</p> <p>There has been no proposed change in the location of Civic Amenity Sites at this stage of the process. However, sites are still being investigated for potential regional waste facilities.</p> <p>The LDP Pre-Deposit Proposals does not propose new opencast coal mining. However, national planning policy requires the Council to identify and safeguard areas of mineral resources, including coal.</p>

Additional Issues Raised / Identified by Respondents

Summary of Representations Received by Issue	Council's Initial Response and Identified Actions for Deposit LDP
<p>Environmental Issues</p> <ul style="list-style-type: none"> • Noise disturbances from M4 have not been identified. • Environmental issues are not given a sufficiently high profile in the plan. • Document does not recognise severe flood risk to parts of the County Borough. Development on floodplain should not be permitted unless you can deal with the consequences. <p>Minerals Issues</p> <ul style="list-style-type: none"> • Llynfi, Garw, Ogmore, Valleys Gateway and parts of Pen-coed should recognise that coal resources are present in the sub area. • National Policy Context should refer to MTAN2 and its content should be applied to Deposit LDP. • Need for additional issue on mining legacy in the north of the county borough which will need to be taken account of in development proposals. • Comments set out in the Regional Technical Statement for Aggregates (RTS) are not fully reflected in the pre-deposit proposals, most notably the importance of limestone extraction in the administrative area of Bridgend. • Greater recognition of the County's mineral resources is needed; coal in particular. • LDP will need to make reference to MTAN2. Areas of un-worked coal are a valuable resource which must be safeguarded from sterilisation. 	<p>The European Noise Directive requires WAG to produce strategic noise maps for road, rail, and for major settlement areas. These noise maps are used to produce action plans to manage noise issues. WAG has now completed draft strategic noise maps for major roads, railways and the major urban areas of agglomerations. Implications arising from these will be taken account of in the Deposit LDP where appropriate.</p> <p>The Pre-Deposit Proposals document identifies environmental issues throughout the document. One of the four high level objectives also concerns environmental issues. The Council will consider reference to the environment in the vision to acknowledge the flow to the high level objective to protect and enhance the environment.</p> <p>The Pre-Deposit Proposals recognises flood risk issues and this is referenced in paragraph 3.3.13 and Policy SP2. A Strategic Flood Consequences Assessment (SFCA) is currently being undertaken and will inform the Deposit LDP.</p> <p>National planning policy requires the Council to identify coal resources that are present in the County Borough. These will be identified in the Deposit LDP.</p> <p>All National Planning policy will be taken into account when considering the content of the Deposit LDP.</p> <p>The mining legacy of the County Borough is referenced in paragraph 3.2.4 of the Pre-Deposit Proposals, and will be considered in future landscape assessment work.</p> <p>The importance of limestone extraction in the County Borough is referenced in paragraph 3.3.20 of the PDP. The Council is aware of the requirements of national policy in relation to mineral resources, including the safeguarding of limestone and coal resources, and this will be reflected in the Deposit LDP.</p>

Summary of Representations Received by Issue	Council's Initial Response and Identified Actions for Deposit LDP
<p>Housing Requirements</p> <ul style="list-style-type: none"> • Include information related to the new 2006 population projections. • Housing requirement for the LDP should be kept under review in light of likely release during 2009 of household projections from the Welsh Assembly. • Information on the Local Housing Market Assessment should be included. • New national issue reflecting the requirement to provide a sufficient amount of good quality accommodation that is affordable and appropriate for peoples needs. • Housing apportionment is not based on a scrutinised strategy or robust evidence base. • Dwellings allocations should not rely on apportionment numbers. • No clear mechanism for implementation and monitoring of apportionment. • There is a lack of low cost housing in Porthcawl. It is therefore the responsibility of the Council to support young people by providing affordable housing. <p>Renewable / Sustainable Energy Issues</p> <ul style="list-style-type: none"> • SSA F imposition and refinement should be looked at again. Large Scale wind farms will have a deleterious effect upon the Authorities stated intention of regenerating the Valleys and growing tourism and recreational pursuits in these areas. Threat of communities being surrounded, particularly Evanstown. Likewise the Pen y Cymoedd development to the north of the Borough's boundary will impinge upon settlements in the upper Llynfi, Garw and Ogmore Valleys. • Needs to be more emphasis on Sustainable energy, not just renewable energy. (refers to Coal Bed Methane). • The LDP should ensure the strategy; policies and allocations are sufficiently flexible and capable of delivering a broad range of sustainable and renewable energy solutions. 	<p>The 2006-based household projections were released in early 2009. The Council is currently examining the implications of these figures in light of its own projections used in determining future growth options for the County Borough. Reference to, and the implications of, the new 2006-based projections will be included in the Deposit LDP.</p> <p>The Local Housing Market Assessment is currently being prepared and its results and implications for planning policy will be included in the Deposit LDP.</p> <p>Whilst not stated as a national issue related to the County Borough, issues LS18 – LS23 in the PDP refer to the need to ensure a sufficient amount of good quality housing that is affordable and meets people's needs.</p> <p>The SEWSPG Housing Apportionment exercise (referenced in paragraph 4.3.3) is a working hypothesis agreed between 10 Local Planning Authorities in South East Wales. The apportionment as it relates to Bridgend was used as one factor in broadly assessing growth options for the LDP, however it was the not the determining factor (See Appendix C of PDP).</p> <p>The lack of low cost housing in Porthcawl is highlighted in issue LS22. The requirements for affordable housing are highlighted throughout the Pre-Deposit Proposals and recognised in Policy SP13. This will be further informed by the completion of the Local Housing Market Assessment.</p> <p>The LDP is required to reflect local circumstances arising from national planning policy guidance. In the case of the Strategic Search Areas identified in TAN 8: Renewable Energy, the 2006 refinement exercise forms part of the evidence base to the LDP and will be used to inform policies within the Deposit LDP. The LDP PDP also promotes tourism and recreational developments in the Valleys areas. These issues will be considered at the point of determining planning applications to ensure that balanced decisions are taken.</p> <p>Such locally occurring sources of energy would need to be considered on its merits at planning application and master planning stage, balanced against the requirements to combat implications of climate change.</p> <p>The Strategy and Strategic Policies do not preclude a broad range of energy solutions. The use of other energy sources will be considered on their merits, subject to other policies within the Deposit LDP.</p>

Summary of Representations Received by Issue	Council's Initial Response and Identified Actions for Deposit LDP
<p>Community Facility / Development Issues</p> <ul style="list-style-type: none"> • BCBC is a beautiful and diverse place but there is a great need to protect the country from over development. More facilities for young people should be provided such as skate parks, adventure playgrounds and open green spaces. Meeting areas should be provided in each town or village with seating and flowers, even a fountain. • We need more sport facilities and youth centres and boxing gyms to keep kids off the streets for less crime. • Coal Board land in Caerau should be looked at to provide a BMX track with earth ramps for local children. Site would keep them off the pavements and roads. Would it also be possible to site a ramp for skateboards etc. next to the Brewers Field site when it is finished? <p>Tourism Issues</p> <ul style="list-style-type: none"> • NR3 and 4 (Porthcawl and Valleys): Need to acknowledge tourism development in rural areas not just Porthcawl. Development of attractions and activity products in the destination that stimulate longer stays and not just accommodation. • Plan should recognise specific heritage assets which will attract tourism and economic sustainability, thus providing higher standards of living. <p>Employment Issues</p> <ul style="list-style-type: none"> • LDP should seek to balance and reflect more closely the likely need and demand for employment land. <p>Porthcawl Specific Issues</p> <ul style="list-style-type: none"> • Objects to reference to Pwll y Waun as an employment site. Porthcawl lacks recreational space and this site should be developed for public open space. <p>Ogmore Valley Specific Issues</p> <ul style="list-style-type: none"> • Lack of community facilities in Ogmore Valley. • A4061 and A4093 must be kept in good order. • Parking at J36 for car sharing should be improved • Car parking in Ogmore Valley needs to be looked into. • Old Washery Site, Ogmore Vale has never been put into good order • Coalfield Plateau will become industrialised if wind farms are allowed to surround the area. 	<p>One of the four high level objectives for the LDP is to protect and enhance the environment. The protection of the countryside is included in Policy SP4. The provision of infrastructure, including facilities for young people, is a key component of the LDP Preferred Strategy, will be further evidenced for the Deposit LDP and secured through section 106 agreements associated with planning applications.</p> <p>Issue LS5 recognises that the outcomes of the Sport and Leisure service review and these will be reflected where appropriate in land-use terms in the Deposit LDP.</p> <p>The Council is currently actively progressing with Regeneration proposals for the Caerau area. The land use implications and requirements of any regeneration programmes will be reflected where appropriate in the Deposit LDP.</p> <p>The tourism potential of the whole of the County Borough is acknowledged in issue LS43. This is carried forward to promote tourism developments in Policy SP12. As part of the Preferred Regeneration-Led Spatial Strategy the aspirations of the newly designated Western Valleys Regeneration Area will also be considered in land-use terms and appropriately reflected in the Deposit LDP.</p> <p>The LDP does seek to balance the need and demand for employment land. Paragraphs 9.2.41 – 9.2.47 refer to updating the employment land supply of the County Borough including a reassessment of existing land for alternative uses, whilst recognising the need to retain strategic sites.</p> <p>The adopted Bridgend UDP currently allocates Pwll y Waun as a regeneration site. The LDP affords the opportunity for this situation to be reassessed, particularly in light of the results of the Open Space Assessment which is currently being carried out and balanced against the need to retain a balanced portfolio of employment sites.</p> <p>The objector does not reference specific community facilities which the Ogmore Valley lacks, however the LDP does seek to identify 'Community Hubs' where such facilities could co-locate. It will also seek to facilitate appropriate levels of infrastructure, the need for which may result from new developments. Park and share facilities at Junction 36 of the M4 is included in Policy SP3. Assessment of parking demand or need in the county borough will be based on a comprehensive assessment of a local area's transport infrastructure requirement in order to spread the load of traffic growth across all modes including public transport,</p>

Summary of Representations Received by Issue	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Ogmore Valley has been excluded from rural development. <p>Garw Valley Specific Issues</p> <ul style="list-style-type: none"> • Garw Valley has a TWA to develop a heritage railway on the railway corridor between Pontycymmer and Tondy. • Potential for substantial regeneration in Oxford Street, especially with regard to the railway, offering an attractive centre in the context of tourism. • Garw Valley should have conservation area status due to landscape improvements as well as natural history interest. • In the context of SLAs we hope the setting surrounding the scheduled Tudor Gardens at Plas-y-Betws will be protected and conserved. <p>South Cornelly Specific Issues</p> <ul style="list-style-type: none"> • Object to South Cornelly being in Pyle Kenfig Hill sub area as M4 forms a firm boundary. Village has physical and socio economic similarities with Porthcawl. S Cornelly provides employment land for Porthcawl. Should be included within Porthcawl sub area. <p>Pencoed Issues</p> <ul style="list-style-type: none"> • Objection to issue L12 - level crossing in Pencoed is not a significant constraint - a quota rather than a moratorium on development west of the level crossing Pencoed should be in operation to allow for small-scale development on existing UDP allocations. <p>Miscellaneous Issues</p> <ul style="list-style-type: none"> • There are lots of people waiting to take up allotments. There is a need for more allotments. Where are you going to build them and when are they going to have their opening? • Need for the improvement and reinstatement of bridle paths. Many safe riding areas cannot be reached by horse riders without them having to ride on busy roads. 	<p>walking and cycling. Basing parking demand on a 'predict and provide' approach would compromise the Council's sustainable development policies.</p> <p>A Regeneration Strategy for the Ogmore Valley is shortly to be commissioned as part of the Rural Development Programme and will address particular issues concerning the area. If possible within the existing time-scales, the Deposit LDP will include the land use implications of this Strategy.</p> <p>The LDP PDP promotes tourism developments under Policy SP12. In the Garw Valley particularly, the Regeneration Strategy promotes new activity-based attractions, services and facilities, to complement developments in adjacent areas.</p> <p>The existing Special Landscape Areas of the County Borough are currently being reviewed against a regionally-agreed methodology using data from LANDMAP. These updated areas will be included within the Deposit LDP.</p> <p>The sub-areas are based on well-established local Policy Forum areas which are based on the geography of the area, the transport network, existing settlements and the linkages between them. It is considered appropriate therefore that South Cornelly remains within the Pyle Kenfig Hill sub area. The links between the Porthcawl and Pyle Kenfig Hill Area is however recognised at the Spatial Plan level as a Hub settlement.</p> <p>Issue LS12 is derived from the current policy position under operation by the Council. It is for the LDP options to determine if it is a future priority to resolve this issue in the future by the allocation of new development which could fund the necessary improvements.</p> <p>The Council is currently undertaking an assessment of allotment land in the County Borough and is likely to develop an Allotment Strategy; as part of the wider assessment of Open Space, the results of this will be used to inform the Deposit LDP.</p> <p>The land-use implications of the Council's Rights of Way Improvement Plan will be used to inform the Deposit LDP.</p>

Summary of Representations Received by Issue	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Vital that crime prevention becomes a key consideration as it contributes towards the overall aims of the LDP and needs to be considered in all development proposals in terms of design, layout, lighting and landscape. Development should incorporate the principles of 'Secured by Design'. • Pen Y Fai School needs replacement as buildings are no longer fit for purpose. • With the decline in the production of oil by 6% in the next couple of years. What are plans are you making for when petrol and diesel cost £5 a litre. • Very uncertain about planning for only 18 years. Longer term vision and expertise is vital. 	<p>The Council recognises the importance of design in crime prevention. It has included this as one of its Sustainable Place Making Principles in Policy SP2 of the PDP.</p> <p>The adopted UDP includes a policy for a new educational facility at Pen Y Fai school. The Council is currently pursuing this project.</p> <p>The LDP seeks to promote the use of public transport as part of the LDP Strategy. (Objective 1f and Policy SP3 refer). The Council's recently adopted Walking and Cycling Strategy and active promotion of Travel Plans as part of the development control process will help reduce the-over- reliance on motorised transport by encouraging more people to walk, cycle and car-share in order to address those issues associated with global warming'.</p> <p>Paragraph 1.2v of <i>LDP Wales</i> states that “<i>LDPs need to contain clear and concise statements of how places will change over the plan period (i.e. the next 10-15 years)</i>”</p>

LDP Vision

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Not enough Vision for the whole of the County Borough through regeneration. Parts of the Borough miss out. • Vision does not recognise catalyst that other settlements can provide in achieving vision. North Cornelly and Pencoed could provide a future role in accommodating present and future population. The omission of these settlements gives rise to uncertainty of their future role. • Vision should acknowledge that all settlements will play a role in achieving a sustainable, safe, healthy and inclusive network of communities. • Include more emphasis on the need to provide good quality appropriate housing in the Vision. • The catalysts for the transformation will need integrated 7 days a week transport linking all communities. • In some way, good and open communication is very important for today and the future. • Vision should be amended to read " The catalyst for this transformation will be: A successful regional employment, commercial and service centre in and around Bridgend. • Broad based plans seem sound and logical. However this is a specific lack of focus on the Garw Valley. Contrast with Llynfi Valley treatment. Absence of mention of investment in developing tourism in the Garw Valley. Bettws Boys and Girls Club have secured funding for a bunk house project. Affordable residential development references do not specify whether this is for new housing or enhancement of current stock. Mention of improvements to existing residential stock would be welcomed. • Vision for 'thriving communities' does not address the substantial potential for tourism in Garw Valley. Development in Valleys Gateway should also be of a 	<p>The draft LDP Vision covers the whole of the County Borough. The spatial references within it refer to those areas which will provide the strategic development catalysts which are required to achieve the Vision. The Preferred Strategy continues by covering specific areas for regeneration, and particularly the scale of that regeneration which will assist in achieving the overall Vision for the County Borough.</p> <p>The Vision is not intended to be land-use specific. However the issue of good quality and appropriate housing is covered within the issues, objectives and policies of the LDP PDP.</p> <p>The Council acknowledge this need. Transportation related issues, objectives and policies to assist in the achievement of this are contained within the LDP PDP.</p> <p>The Vision statement in relation to Bridgend town is derived from the Wales Spatial Plan's envisaged future role for the town. The rest of the vision statement refers to the whole of the County Borough including those areas around Bridgend. It is therefore not considered necessary to amend the statement. The planning, provision and management of transport infrastructure such as highways, footpaths and cycle routes in many instances, are the responsibility of the Council. However, the provision of services such as the running of buses and trains is a commercial undertaking which does not lie with the Council, beyond some limited influence with contracts.</p> <p>The Vision statement includes reference to visiting and relaxing in the area which encompasses tourism development. These aspirations are carried forward into specific objectives and policies within the LDP Pre-Deposit Proposals.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>high quality to give visitors good first impression.</p> <ul style="list-style-type: none"> • Vision needs to acknowledge that a tourism offer is needed that's vibrant, diverse and appealing throughout the destination and entire BCB area. 	<p>In relation to the Garw Valley and Valleys Gateway, the Vision recognises the value of these areas as catalysts for development by the reference to: "thriving valley communities" with further clarification given to the role of these areas within the Preferred Strategy.</p>

LDP Objectives

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Amend OBJ1c and 1d in relation to tourism. Specific wording suggested. • 1e - the existing transport network will not achieve this objective. • obj1f - should read provide not support • objj2a - should include geological • obj2b - should include noise reduction • Agree with objectives but environmental objectives are weak. Obj 2b is too broad, too high level. This objective should ensure better compliance with WFD objectives. There is no mention of protecting biodiversity within this section. • Support OBJ 2d: additional wording "...commitments for mineral resources (including through minerals safeguarding and dealing with responding to mining legacy), waste management....." 	<p>Tourism developments are referenced and supported by objective 3d. Objectives 1c and 1d are place-specific objectives rather than issue-specific.</p> <p>The purpose of the LDP is to provide the policies and framework which will achieve this objective. The LDP PDP provides for the improvements of the existing transport network. The adopted Walking and Cycling and a suite of Travel Plans will promote integrated transport and spread travel across all modes. This will help reduce road congestion particularly during peak periods.</p> <p>Government transport policy no longer supports the 'predict and provide' approach where road capacity is expanded to meet traffic growth. Instead, the Council works in partnership with developers to provide the transport requirements of their developments. Some of the measures that may be provided include soft and voluntary measures such as walking and cycle routes and car-sharing. The success of these initiatives will depend on mutual support.</p> <p>The Council works in partnership with developers and public transport operators to provide integrated transport solutions. However it will consider changing the wording of the objective in the Deposit LDP.</p> <p>References to the geological environment of the County Borough are covered under the term 'natural environment'.</p> <p>Following a review of the strategic noise maps, the Council will consider if an objective relating to noise reduction is justifiable for the Deposit LDP.</p> <p>The Council consider that the environmental objectives (including the high level objective) adequately reflect the environmental issues raised in the preceding chapters of the documents. The protection of biodiversity is addressed by objective 2a.</p> <p>The Council consider that the suggested form of wording is too specific for the objective and the wording as it stands would cover this point. However, reference to mineral safeguarding is included within the Preferred Strategy and Strategic Policies.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • obj2e - disagree, Bridgend can contribute from coal extraction • Obj 2e states that renewable energy should be promoted not just by wind farms but also solar, tidal and hydro-electric. • There is an over reliance on Renewable Energy rather than sustainable energy. i.e. Obj2e. • 4b and 4d - needs specific mention for Places of Worship. • Broadly support four strategic objectives. Omission to reference to new housing being provided where people wish to live in the communities theme. LDP should follow PPW by providing a choice of locations allowing people to exercise choice in terms of where they wish to reside. Objective 4c should be recast to reflect this. Such an objective would allow the LDP to respond to population and household growth over the Plan period whilst supporting a sustainable pattern of development. • Objective 4c should be reworded to ensure allocation of an appropriate quantity and variety of housing sites to deliver high quality choice in sustainable locations well served by essential facilities and accessible by a range of transport modes. • Additional objective "To ensure that all development is well designed, sustainable and inclusive, contributing to the local distinctiveness and the place in which it is located". • Whilst we agree with the main objectives we feel the Borough would benefit more if a greater emphasis was placed on the spread of employment and housing to other areas within the Borough and not centred around large development sites reducing choice of location and house type. 	<p>The objective does not specifically exclude coal extraction; however it does reflect national policy for the promotion of renewable energy generally which includes solar, tidal and hydro-electric power.</p> <p>Such locally occurring sources of energy would need to be considered on its merits at planning application and master planning stage, balanced against the requirements to combat implications of climate change.</p> <p>The Strategy and Strategic Policies do not preclude a broad range of energy solutions. Solution at planning application stage and for allocations will acknowledge local circumstances. In principle, sources of renewable energy are considered to constitute sustainable resources worthy of inclusion in the plan.</p> <p>Places of Worship are defined as a Community Facility in paragraph 9.2.73 of the PDP. They are therefore already covered by the objective as worded.</p> <p>Objectives 1a – 1f cover spatial aspects of all development types, including housing, to create Places where people wish to live. There is therefore no requirement to update objective 4c in relation to this as it is covered elsewhere.</p> <p>Good design is implicit with the high level objective of Producing High Quality Sustainable Places. Although not specifically defined as an objective – these aspirations are reflected in SP2.</p> <p>The specific spread of employment and housing land throughout the County Borough is covered in the Spatial and Preferred Strategies outlined in the PDP.</p> <p>National Planning Policy Guidance favours brownfield land developments over greenfield sites. This is acknowledged by the Council and will be taken forward in its</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none">• Further objective which confirms development should come forward in a sequence which prioritises brownfield sites.	assessment of sites for allocation in the Deposit LDP. Brownfield site prioritisation is also inherent in the Regeneration-Led Spatial Strategy.

Growth Options

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Housing requirement should increase. The LDP must be based on the most up to date information with respect to housing and population which means consideration should be given to the latest evidence provided within the new Local Authority Population Projections. • The LDP must include a thorough assessment of the ability of the county borough to accommodate housing development. • Support existing proposals in UDP; no need for an increase in provision. • Demand fallen recently and local employment opportunities have declined. • Agree with option as long as communities are provided with their needs. • Option 3 could increase outflow of commuters to Cardiff and Swansea making Bridgend dormant. • We support option 7 provided there are sites that have potential to be accessed by rail. • Current house building allocation is not compatible with development and sustainability goals in South East Wales. • Objects to the (SEWSPG) apportionment process. • 7.2.12 - penultimate sentence should identify or explain "other delivery mechanisms and models". • 7.2.15 - the 52 hectares should be reassessed to identify alternative uses: preferably new growth industries and housing towards achieving housing target. 	<p>The Council has set out its rationale for choosing the preferred growth option for the LDP in sections 7.4 and 7.5 and Appendix C of the PDP document. There has been support for the full range of growth options from different respondents to the consultation.</p> <p>Whilst the reasoning for coming to this decision remains the same, the Council will respond as follows to particular points made.</p> <p><i>Local Authority Household / Population Projections</i> The 2006-based household projections were released in early 2009. The Council is currently reviewing these figures in light of its own projections used in determining future growth options for the County Borough. Reference to, and the implications of, the new 2006-based projections will be included in the Deposit LDP.</p> <p><i>SEWSPG Apportionment Process</i> The SEWSPG Housing Apportionment exercise (referenced in paragraph 4.3.3) is a working hypothesis agreed between 10 Local Planning Authorities in South East Wales. The apportionment to Bridgend was used in broadly assessing growth options for the LDP, however it was not the determining factor (See Appendix C of PDP).</p> <p><i>Affordable Housing – Other Delivery Mechanisms</i> Paragraph 7.2.12 refers to the use of “<i>other delivery mechanisms and models</i>” in relation to affordable housing. This is in recognition that the planning system alone cannot meet the affordable housing needs of the County Borough from contributions from market-housing developments. Other delivery mechanisms include the use of Social Housing Grant, Development Trusts, Land Sale protocols etc. to deliver affordable housing in partnership with Housing Associations.</p> <p><i>Employment Land Reassessment</i> The Council has undertaken a review of its employment land portfolio and has identified 45 Hectares of employment land which can be reassessed (paragraph 9.2.41-9.2.47 of the PDP refers) for mixed-use purposes. The final mixed-use proposals will be contained within the Deposit LDP.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Affordable housing should be built in areas where regeneration is needed. Too much agricultural land is being used for housing developments. New housing should have solar panels and triple glazing etc. Energy saving reduce climate change and the need for further coal extraction. • Would appear that Option 4, the High Growth option is the one that produces a population change comparable with the 2006 based population projections. Options 1 is considered to be an underestimation when compared to projections. Option 2 would not bring forward sufficient population to support employment growth. Option 3 again would not meet employment growth, and would fail to bring forward sufficient affordable housing. Option 4 would bring forward comparable population and economic activity levels. Option 5 would exceed projections and give greater quantum of affordable housing. • We await 2006 based housing projection which would need to be taken into account. Evidence points towards levels of housing that accords with strategies 4 and 5. • Comments relating to 'build rates not ever / inconsistently being achieved' are irrelevant as house building would respond to a level of demand which had never been achieved. Infrastructure would additionally need to be supplied as is the intention of the strategy. • As regards to housing supply if option 4 were taken forward this would increase residual requirement and additional sites considered as evidenced by the JHLAS. • Believe that windfall sites allocation should not be based on past rates as opportunities are finite and a reduction in this allowance would be more realistic. • Potential for double counting with windfall sites if new housing allocations are to be found within existing settlement boundaries. • Growth options supported as representing a realistic balance of growth to be accommodate during the plan period. • We support option 3 although housing targets should be a minimum rather than a maximum. 	<p><i>Windfall figures based on past rates</i></p> <p>In order to assess the likely contribution that Windfall sites can make to the dwelling supply, it has been necessary to monitor such sites coming forward under the respective Policies in the Ogwr Borough Local Plan and the Bridgend Unitary Development Plan. As stated in the LDP PDP it is not unreasonable to expect a further contribution of 30 dwellings per annum, coming forward on such sites, during the LDP however continued monitoring will be undertaken for the Deposit LDP.</p> <p><i>Housing Requirements and Employment Needs</i></p> <p>The Council acknowledges that there is currently an apparent incompatibility between the change in economic participation (+1,283) which the LDP Trend Based Growth option predicts, and the Economic Forecasts for Bridgend County Borough (+3,846) predicted in table 7.1 of the Pre-Deposit Proposals (PDP). The data sources are separate, with the economic participation derived from the Chelmer Model and the Economic Forecast sourced from the Regeneration Strategy. Further work is being undertaken to streamline the data sources, examine relationships, particularly in light of the current economic situation, recent house-building activity and the role of Bridgend as sub regional employment centre serving a wider catchment to ensure that the figures in the Deposit LDP are realistic and viable. Details of the outcome of this work will be included in the Deposit LDP.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Support option 7 as over-allocation may lead to employment growth in unsustainable locations. • Growth option is largely supported as established realistic and flexible level of growth required. • Conclusions do not properly follow from the assessments that have gone before in the preceding chapters. • 2003 based population projections are out of date. To use out of date forecasts renders this Plan out of date before it starts. • High Growth Rate should be used for calculating housing provision and greater flexibility needed to allow for modest expansion of significant settlements within the connections corridor. • The housing requirement figure should be reviewed, to ensure that it will contribute towards an appropriate alignment with local employment levels. • The overall housing requirement should be increased to reflect anticipated population demand in Bridgend over the LDP period. • Preferred Growth Option is number 1: 498 dwellings up to 2016. • Flexibility of the preferred growth option seems rational. • 7.4.1 - development of tourism in Garw valley has not been covered satisfactorily. • Mineral resources could give rise to well paid employment opportunities provided they are safeguarded. • Population and household growth option is objected to. Valley areas have experienced low growth compared with rest of County Borough, this trend should be redressed by encouraging higher level of growth. • Housing is important in order to provide homes, consideration leads to sustainability, proper drainage and sewerage. 	

Spatial Strategies

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Welcome the Regeneration Led Strategy as it will present opportunities to address mining legacy issues e.g. Maesteg Washery and former Coegnant Colliery site. • Objects to the Regeneration Led Strategy as the Strategy must allow areas that are attractive to investment to be the prime focus for major development. • The Strategy should utilise incentives and opportunities to attract investment to areas that have experienced lower levels of demand rather than trying to force investment into these areas by restricting opportunities in more attractive areas. • Growth in population also means the demand for allotments is higher. • Fragmentation of regeneration activity with some communities not included in any scheme. Large areas of post-war Council estates are included in these areas. Welcome preservation of industrial and historic buildings. • Good transport links to distribute growth are not mentioned in this section. • There should be a rail led spatial strategy; both for travel to work and for the transportation of raw materials. • 8.4.28 (Population Led Strategy) Worrying that Pyle, Kenfig and Cornelly will lose even more of their green field sites even with close proximity to the Kenfig LNR. Housing and Industry could be placed in other areas such as Stormy Down airfield, where damage to the environment and landscape would be minimal. • Do not disagree with regeneration objectives. However expectation that on the delivery of sites within valleys areas will seek to re-orientate demand which will require sustained investment. The extent to which this can be achieved is uncertain. Table 9.1 states that Pencoed and N. Cornelly, which have previously accommodated modest growth are now to be restricted in terms of growth within the settlement boundary. A distinction should be drawn between settlements which accommodate strategic growth and those suitable for modest expansion where other benefits can be achieved. Such approach provides greater flexibility for the plan to accommodate growth levels. 	<p>The Council has set out its rationale for choosing the preferred spatial strategy option for the LDP in sections 8.4 and 8.6 and Appendix E of the PDP document. There has been support for all the spatial options from different respondents to the consultation.</p> <p>Whilst the reasoning for coming to this decision remains the same, the Council will respond as follows to particular points made.</p> <p><i>North-South Issues</i></p> <p>Several respondents claim that the strategy seeks to 'push' development into the northern valleys area at the expense of other, more attractive parts of the County Borough in the south.</p> <p>However, the Regeneration-led strategy allows for development in all parts of the County Borough, including the large settlements of Bridgend and Porthcawl. This is demonstrated by the spread of activity outlined in paragraph 8.2 of the PDP. The resultant Preferred Strategy allocates growth areas in Bridgend, Porthcawl and the Valleys Gateway which are in the south of the County Borough. There are also a variety of strategic site allocations contained in the Preferred Strategy which are located in the south. The abandonment of the 'predict and provide' approach to transport investment implies that transport provision will be predicated on land-use development. It means that developers will be required to meet the transport demand generated by their development by providing new infrastructure where none exists or expanding or improving existing ones. Consequently significant consideration will have to be given to the accessibility of any sites allocated for development.</p> <p>The regeneration-led strategy seeks to ensure that, wherever a development is located in the County Borough, it seeks to improve the social, economic or environmental well-being of the area.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Support selection of regeneration led strategy. Welcome recognition of Valleys Gateway area to offer scope and capacity for mixed use developments. • Broad approach is generally sensible. There is a risk that sites in the north of the County Borough could not be delivered. It is considered approach is unrobust and create an imbalance. Need for BCBC to anticipate challenge that an over reliance on sites in the north could bring in terms of delivery. Council may need to temper strategy to allow appropriate proportion of growth in the south. • Conclusions do not properly follow from the assessments that have gone before in the preceding chapters. • We agree with strategies 1-3 and feel that given the considerable potential for tourism in the Garw Valley more support should be given in the context of regeneration including promotion of B&B's and hotels. • Population and settlement led strategy would be most appropriate. Limited development in S Cornelly would be beneficial in the context of such a strategy. A strategy which does not permit brownfield site development directly adjacent to settlement boundaries in villages would be inappropriate and inflexible. • Plan should allow for some forms of growth which can seek to provide appropriate leisure and tourism schemes which by their nature may involve built development. Such schemes may be appropriate to rural locations and it is often preferable to locate them close to existing settlements. Flexibility is therefore required to adjust settlement boundaries. • As we now live in uncertain times, morale is necessary to meet the challenges and opportunities. Education in schools can be the basis for inspiration and knowledge. • It is important that the LDP reflects the guidance contained within the Wales Spatial Plan which identifies Bridgend as a Key Settlement and thus acting as a focus for development for housing and employment within the County Borough. 	

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none">• Greater spread of development needed.• We consider there is a need for a greater spread of development throughout the county borough.	

Preferred Strategy

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>Strategic Regeneration Growth Areas</p> <p><i>Bridgend</i></p> <ul style="list-style-type: none"> • Strategy should allow for the allocation of sites within urban limits and on the urban periphery of Bridgend. Concern is expressed regarding the deliverability of sites within the SRGAs particularly in the early part of the LDP period. • Bridgend SRGA relies too heavily on development to the north east. Consequential effect on settlements such as Laleston where growth will be constrained. In order to provide mix of dwellings and sizes, therefore consideration of a range of dwelling sizes and appropriate locations must be given. Laleston provides an ideal and desirable location for helping achieve the necessary range and choice. Executive homes would be the most appropriate type of provision in this area. Laleston is a desirable and sustainable location to live, reflecting objective 1a. An over reliance on difficult, costly and marginal schemes will undermine any recovery. • This is a very high risk strategy which has the potential to damage the principal settlement of Bridgend. Preferred Strategy proposes to choke off Bridgend's growth over the plan period with little potential to attract inward investment. We object to the underlying rationale behind the preferred strategy. • The LDP should refer to the emerging Brackla Regeneration Framework to vision and assist in delivering the comprehensive mixed use regeneration of the site and surrounding area. <p><i>Porthcawl</i></p> <ul style="list-style-type: none"> • Preferred Strategy is objected to. Porthcawl strategic growth is limited to within the settlement boundary. The LDP is aimed at reviewing boundaries in an objective way, existing boundaries may not have been carried out consistently and since those exercises were undertaken characteristics could have changed. Cypress Gardens site has previously been considered acceptable within boundary by UDP Inspector. Consider that if no review of boundaries takes place the Population and Settlement led strategy would be more appropriate. 	<p>The Council has set out its rationale for choosing the Strategic Regeneration Growth Area for the LDP in sections 9.2.3 - 9.2.16 of the PDP document. Development in these areas will significantly contribute to the achievement of the LDP Vision and Objectives.</p> <p>Many of the individual sites mentioned in the PDP document which contribute to an individual SRGA are existing proposals or developments which are significantly far along in the planning process.</p> <p>However, it is important to note that developments outside of the SRGAs will be permitted. However, it is envisaged that these schemes will be small-scale in nature or are those will existing consents.</p> <p>Paragraph 9.2.14 already reference this and outcome of this process and future Development Brief will be included in the Deposit LDP.</p> <p>All settlement boundaries will be reviewed as part of the LDP process and the Council is currently formulating a consistent methodology by which to do this. Likewise, it is also adopting a process by which Candidate Sites submitted at an earlier stage of LDP preparation can be assessed for inclusion in the Deposit LDP.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> Pyle's identification in the WSP as a hub is not reflected in the LDP Strategy. The Porthcawl SRGA should be amended to make reference to Pyle as a hub. This approach is not consistent with WSP and the LDP needs and issues raised in the document regarding Pyle. Pwll y Waun is unsuitable for a mixed use scheme. Consider residential is better in current context. <p><i>Maesteg and Upper Llynfi Valley</i></p> <ul style="list-style-type: none"> Strategy should allow for the allocation of sites within urban limits and on the urban periphery of Cwmfelin. Concern is expressed on deliverability of sites within SRGA at Maesteg, particularly in the early part of the LDP. <p><i>Valleys Gateway</i></p> <ul style="list-style-type: none"> Support general thrust of strategy. Support recognition of Christie Tyler Site. Affordable Housing reference should be removed as this does not appear anywhere else in relation to specific sites. Largely support the Regeneration-led spatial strategy, the recognition of the potential of the Valleys Gateway to provide future development and the identification of Sarn Park MSA as a site with potential for employment uses. Would prefer range of uses stated in document to include A3 uses, crèche and health club/ gym as well as a business park. <p>General Locational Representations</p> <ul style="list-style-type: none"> 4 SRGAs do not address the potential for tourism in the Garw Valley. The Preferred Strategy should give greater clarity regarding the anticipated distribution of housing and employment growth so that the implications of the proposed approach can be better understood. A greater emphasis should be given to the potential role of the South Eastern part of the County Borough. 	<p>Pyle's identification as a hub settlement within the Wales Spatial Plan is dependent upon its link with Porthcawl. The Council consider that the Porthcawl SRGA represents the main catalyst to assist in the regeneration of the wider area positively impacting upon the Pyle area as identified in the Strategic Diagram. This impact is identified in the Wales Spatial Plan as a rationale for the designation of hub settlements. Smaller-scale regeneration-led initiatives with Pyle are not precluded by the existence of the Porthcawl SRGA or the Strategy.</p> <p>The adopted Bridgend UDP currently allocates Pwll y Waun as a regeneration site; this is based upon the recommendation from the previous UDP Inspector. No evidence has been submitted to suggest why a mixed use scheme is not the most appropriate means of delivering regeneration benefits.</p> <p>The LDP Strategy does not preclude small-scale sites within settlement boundaries from being developed during the Plan period.</p> <p>Housing delivery references inherently means an element of affordable housing and this could also have been referenced elsewhere. The reference to affordable housing on the Christie Tyler site within the LDP PDP is an anomaly. All sites will require specific affordable housing targets as part of their policy designation – the Deposit LDP.</p> <p>The detailed proposals for the Sarn Park MSA will need to be submitted as part of a planning application for the area. Other ancillary or complementary proposals as part of mixed-use scheme will need to be judged on their merits as part of detailed considerations for the site.</p> <p>Paragraphs 9.2.52, 9.2.53 and Policy SP12 of the LDP Strategy supports tourism developments.</p> <p>The precise distribution of employment and housing land will be included in the Deposit LDP.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Concern regarding Penyfai has 'No Strategic Growth' with 'Development within the existing settlement'. Pleased that there is a commitment to reviewing settlement boundaries. Would like Table 9.1 in relation to Penyfai to read: "No Strategic Growth. Development within existing settlement with minor amendments to settlement boundary". • Strategy should allow for the allocation of sites within urban limits and on the periphery of Pont Rhyd y Cyff. Concern is expressed regarding the deliverability of sites within the SRGA of Maesteg particularly in the early part of the LDP period. • Pencoed is identified as being constrained by the level crossing, but strategy does not address this. Moratorium is stifling investment. Sites west of the railway line should be encouraged if suitable measures to mitigate against the perceived highway impacts. This could unlock the future regeneration of Pencoed. <p>Candidate Sites / Settlement Boundaries</p> <ul style="list-style-type: none"> • Individual settlements must be able to retain clear identity (no sprawling or ribbon development). • The Council's predicted housing supply generated by Candidate Sites within the settlement boundaries appears optimistic. • Tondu and Aberkenfig's strategic location and good transport links could generate growth requiring provision of additional housing. • South Cornelly's location and good transport links and close relationship with Pyle / Kenfig / Cornelly could generate growth requiring provision of additional housing. • 9.2.20 - Settlement boundaries should be reviewed only where it is essential for the strategic development of adjoining land. • 9.2.67/68 (Windfall sites)- where possible these sites should be within the existing settlement boundaries. 	<p>All settlement boundaries will be reviewed as part of the LDP process and the Council is currently formulating a consistent methodology by which to do this.</p> <p>The LDP Strategy does not preclude small-scale sites within settlement boundaries from being developed during the Plan period.</p> <p>The Council has chosen not to pursue a level of growth in Pencoed west of the railway line in order to facilitate development as the scale of development required could severely restrict the distribution of development to other areas of the County Borough. However, the Council is committed to producing a Regeneration Strategy and Action Plan for Pencoed, the land-use implications of which will be expressed in the Deposit LDP.</p> <p>The Council currently pursues a policy of designating Green Wedges between settlements in order to protect their identity. These designations will be reviewed for inclusion in the Deposit LDP.</p> <p>The housing supply generated by Candidate Sites that are proposed to be included in the Plan will be confirmed in the Deposit LDP. This can only be undertaken once the Candidate Site assessment process has been undertaken.</p> <p>This is reflected by Tondu and Aberkenfig's location in the Valley's Gateway SRGA.</p> <p>Neither South Cornelly nor Pyle / Kenfig / Cornelly are designated as areas of growth in the LDP PDP.</p> <p>The Council is committed to reviewing all settlement boundaries in order that the LDP is up-to-date. Windfall sites are, by their very nature, within settlement boundaries.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • A settlement boundary at Island Farm has been urged by the previous Inspector and should be included in the new LDP. • Agree with overall policy with no further extension into countryside. At Coity however, some of the sites have poor public transport links. • Nobody knows and values 'the countryside' more than the local population who appreciate and love their area. • There remains an apparent reluctance to consider favourably any new dwellings outside settlement boundaries. <p>Affordable Housing</p> <ul style="list-style-type: none"> • If affordable housing is a priority the Policy must clearly indicate that other contributions funded from land value will be adjusted to ensure development viability is not affected. • Affordable percentage targets and thresholds within the deposit LDP must include an appropriate assessment of the likely impact of the Policy on development viability. • Land supply needs to be increased and a 10% contingency allowance should be added for flexibility. <p>Gypsies and Travellers</p> <ul style="list-style-type: none"> • The Bridgend LDP does not seem to be consistent with national policy as regards Gypsy and Traveller accommodation and must be considered unsound because of this. <p>Environment</p> <ul style="list-style-type: none"> • Merthyr Mawr and it's environs have special environmental characteristics which need to be preserved. • LDP should prohibit planning applications which could have an adverse impact upon the Llangynwyd Village conservation area and the landscape conservation area. Footpaths and bridleways in these areas should be maintained to allow for public access. 	<p>There is an existing settlement boundary at this location designated by the UDP. This, along with all settlement boundaries will be reviewed for inclusion within the Deposit LDP.</p> <p>Policy SP4 reflects national policy and states that development proposals which impact upon the integrity of the countryside (i.e. land outside settlement boundaries) will not be permitted.</p> <p>The Council considers that every development site will have its own individual circumstances when considering requirements for policy / infrastructure obligations. It is therefore not seen as appropriate to prioritise one issue over another for every site across the County Borough. Site viability will be an important factor when allocating sites for development in the Deposit LDP, the Council will be undertaking site viability analysis report to inform this process.</p> <p>An assessment regarding Gypsy and Traveller Accommodation has recently been commissioned. The results and implications of this study will be included in the Deposit LDP.</p> <p>All national and regional environmental designations will be acknowledged in the Deposit LDP. Policy SP4 of the LDP PDP seeks to protect these areas.</p> <p>The existing Special Landscape Areas of the County Borough are currently being reviewed against a regionally-agreed methodology using data from LANDMAP. These updated areas will be included within the Deposit LDP. Policies SP4 and SP5 seek to protect SLAs and Conservation areas. The land-use implications of the Council's Rights of Way Improvement Plan will be used to inform the Deposit LDP.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>Minerals</p> <ul style="list-style-type: none"> Mineral Workings should adopt a sequential test throughout the County Borough. 9.2.34 No mention here of 500m buffer zone which should be included and made absolute in the LDP to protect individual dwellings. 9.3.6 We disagree that coal extraction should be 'safeguarded'. In the interests of damaging the climate and contributing to CO2 emissions from coal burning, a move away from coal extraction should be Bridgend's aim. <p>Community Facilities</p> <ul style="list-style-type: none"> The pre-deposit proposals fail to embrace opportunities for private funding initiatives to provide much needed community facilities. <p>Tourism</p> <ul style="list-style-type: none"> Fails to promote tourism and associated benefits. References to 'green tourism' and 'eco-tourism' should be replaced with 'sustainable tourism'. Bridgend LDP should include a policy relating to the rationalisation of Happy Valley. The improvement of this site would be compatible with the Council's intention to promote Porthcawl as a strategically important tourist resort. <p>Retail</p> <ul style="list-style-type: none"> LDP does not allocate further large scale sites for retailing. Justification is based on CACI Retail Needs Study but this lacks clarity and is a simply theoretical exercise. A robust assessment of retail need is not given and study does not recognise pressures on existing retail facilities. Policies should be flexible to allow for the emergence of proposals which have not been realised which could bring about benefits. Need test has been removed in England. Retail's role in economic development and regeneration has not been acknowledged. 	<p>There is a requirement of the LDP to adhere to National Guidance by designating mineral safeguarding and buffer zones where deposits occur locally.</p> <p>Such issues will be covered in mineral policy in the Deposit LDP.</p> <p>The Pre-Deposit Proposals was issued prior to the issue of the Coal TAN. Hence, the inclusion of a reference to a 500m buffer zone was not possible.</p> <p>Coal resources not coal extraction will be safeguarded in the Deposit LDP in accordance with the advice contained in the Coal TAN. The Council has no choice in this matter.</p> <p>Policy SP15 of the LDP PDP sets out the requirements for the provision of infrastructure in association with land-use planning applications. It cannot require that Private Funding Initiatives are used to deliver infrastructure that is not associated with a development proposal.</p> <p>Paragraphs 9.2.52, 9.2.53 and Policy SP12 support tourism developments.</p> <p>The Council agrees with this suggestion and will make the necessary changes in the Deposit LDP.</p> <p>This issue will be considered as part of the settlement boundary review and assessment of candidate sites.</p> <p>The LDP PDP states that there is a requirement to allocate a site for Bulky Goods retailing in the south of the County Borough and that this will be designated in the Deposit LDP. The Council considers that the CACI study is a robust assessment of retail need and that, as it has calculated a negative need for convenience goods retailing until 2021 that pressure on existing retail facilities is not an issue at this time. Whilst the retail need test is proposed to be removed in England, Welsh national planning policy still requires it to be demonstrated. The Deposit LDP will contain policies which facilitate the required quantum of retail development for the Plan Period, and associated policies will allow for flexibility if this situation changes.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>Employment</p> <ul style="list-style-type: none"> The LDP should provide for greater flexibility and support for the reallocation of suitable and underused employment sites and allocations to other purposes including housing and or mixed use developments. <p>Transport</p> <ul style="list-style-type: none"> Increasing the number of trains using the line daily would reduce level of privacy and also increase noise and vibration levels. Should the services increase during peak periods only. All new developments to take account (fully) the needs of cyclists and walkers. <p>Energy</p> <ul style="list-style-type: none"> It would be useful if you would consider including locations of refined strategic search areas for wind farm developments on future editions of the LDP. Objects to inclusion of wind farms within the latest version of the LDP as over development of wind farms will lead to more and more gas fired stations being required as wind farms require back up from conventional sources. Refined SSA has already exceeded recommended capacity in terms of planning applications. SSA is elevated site and turbines would be significant and incongruous; could compromise other LDP objectives. Site provides habitats and development could damage environment and local ecology. Potential cumulative impact with other wind farms at Taff Ely. Noise impact on health and quality of life of local residents. Economic threat - property prices and difficulty in attracting business to the area. Road safety risk during transportation. Site has a Special Landscape Area status which would be seriously compromised. Objects strongly to inclusion of wind farms. Can't equate them to regeneration of valley communities when they have so many negative sides such as their impact on tourism, walking groups, mountain bikers plus the destruction of beautiful upland areas. Object to wind farm proposals in north of the County Borough. North has beautiful landscape which has special landscape status, which would have 	<p>The Preferred Strategy contains proposals for the assessment and reallocation of suitable employment sites in paragraphs 9.2.41 – 9.2.47 and will be further assessed in light of emerging evidence.</p> <p>The operational frequencies of public transport providers cannot be influenced by the LDP. The LDP can only seek to provide the infrastructure to facilitate increased service frequencies.</p> <p>Policy SP3 states that development proposals should promote transport through good design and enhanced walking and cycling provision.</p> <p>The LDP is required to reflect local circumstances arising from national planning policy guidance. In the case of the Strategic Search Areas identified in TAN 8: Renewable Energy, the 2006 refinement exercise forms part of the evidence base to the LDP and will be used to inform policies within the Deposit LDP. The LDP PDP also promotes tourism and recreational developments in the Valleys areas as well as protecting areas of landscape importance. These issues will be considered at the point of determining planning applications to ensure that balanced decisions are taken.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>been designated as a national park. Tourism and cultural heritage resources will be despoiled by wind farms and will adversely affect the local community's employment prospects. Wind farms reduce the vale of homes and prevent business people from raising capital to start and expand businesses leading to the long term economic decline of the area. Decisions on these will affect region for generations to come; need an independent inquiry on the long term economic effects.</p> <p>Disabled Access</p> <ul style="list-style-type: none"> Do the proposals address the needs of disabled people for accessible and affordable housing and employment opportunities? 	<p>Policy SP2 states that all development proposals shall ensure equality of access for all. National policy requires all planning applications to submit design and access statements to demonstrate how this will be achieved.</p>

Strategic Policies

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>SP1: Strategic Development Distribution</p> <ul style="list-style-type: none"> should be revised to state: "outside of these areas, but within revised settlement boundaries" with a new bullet point stating: "meeting local needs to provide for a range of housing opportunities". Object to the omission of Pyle in SRGA. Request it is included. does not allow flexibility for considering sites that fall outside settlement boundaries but represent a natural extension to the settlement boundary whilst also meeting the social, economic and regeneration criteria. <p>SP2: Sustainable Place Making Principles</p> <ul style="list-style-type: none"> Acknowledge policy, but should refer to prioritising of brownfield sites. Principles covered by national guidance; message become diluted. Some of the objectives could go in SP3, 4 or 5. Code for Sustainable Homes should be included in monitoring. should contain additional criteria to state: Mitigating against any ground stability issues arising from mining legacy or other sources. 	<p>The settlement boundaries of the current adopted UDP are being reviewed and revised, where appropriate for the LDP. It is not considered appropriate to include the word 'revised' in the policy wording as the reviewed boundaries will be those contained within the Deposit LDP. Housing opportunities are referred to in Policy SP13.</p> <p>The Regeneration-led strategy requires development to be focussed in accordance with the Council's regeneration priorities. Whilst the Preferred Strategy acknowledges that regeneration-led developments in Pyle will take place, they are not considered individually significant to warrant the designation of a SRGA.</p> <p>The settlement boundaries of the current adopted UDP are being reviewed and revised, where appropriate for the LDP. The Candidate Site process will also inform this review of boundaries. The LDP will seek to accommodate all anticipated urban related growth within the reviewed settlement boundaries. There will therefore be no requirement for additional development sites unrelated to countryside activities that fall outside, but adjacent to the settlement boundary.</p> <p>The preference for brown field sites over green field is an inherent part of the Regeneration led Spatial Strategy.</p> <p>The purpose of Policy SP2 was to provide Sustainable Place Making Principles or Development Management principles in one policy rather than repeating the principles / criteria again in lots of LDP policies. Policy SP2 will be applied to all developments.</p> <p>In line with emerging national planning policy on the use of the Code for Sustainable Homes in new housing development it seems a sensible suggestion to monitor the number of dwellings built to different code levels. This will be included in the Deposit LDP.</p> <p>Unstable land will be the subject of a specific policy in the Deposit LDP.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Objects to requirement of SUDS because of Welsh Waters policy position. • "Having a location and layout...." BCBC needs to make it more attractive and convenient and easier for people to choose to walk, cycle and use public transport. • Target should be 100% compliance with EA advice. Implies 5% of developments at risk from flooding cannot be managed to an acceptable level. • "...minimising the risk from flooding..." is unclear. Should read: "Avoiding or reducing the consequences of flooding to an acceptable level, as judged by advice from the Environment Agency". <p>SP3: Strategic Transport Planning Principles</p> <ul style="list-style-type: none"> • Supports the rail related schemes under SP3 except for Brackla Railway Station and foot Bridge. • Disappointed only reference to P&R schemes is at Brackla Rail Station. This scheme is in doubt and another site should be identified. • All road schemes opposed. • No mention of Garw Valley railway line in Transport Strategy. Key tourism project. • Does not refer to Pencoed bridge scheme. • Walking and Cycling: Welcomes number of RTP schemes, including Llynfi Valley and Bridgend to Porthcawl routes. The following routes should also be included: Brewery Field to Town Centre; link from Celtic Trail at Brynmneyn to Bryngarw Country Park. 	<p>The Council recognises that the requirements for SUDS within developments will not be feasible or practical in all instances. Adding the phrase: "...where appropriate" to the end of the criteria will assist in clarifying this point.</p> <p>Agree, this is the aim of the Policy.</p> <p>The Council considers that flexibility is required in assessing applications which lie in areas of flood risk. The 95% target does not imply that 5% of developments in flood plains cannot be managed to prevent flooding to an acceptable level, rather it allows the Council to consider all material matters relevant to a planning application before taking a decision. It should be noted that, whilst the Environment Agency Wales has requested the indicator wording to be changed, it has not objected to this target.</p> <p>The Council considers that the risk of flooding should be kept to a minimum in line with national planning policy. However the Council has agreed to examine the precise wording of the policy following representations from the Environment Agency Wales.</p> <p>Policy SP3 reiterates the strategic transportation schemes which are in the South East Wales Regional Transport Plan. These include the Brackla Railway Station proposal. The inclusion of these schemes does not preclude the identification in the Deposit LDP of more locally-significant scheme (including additional park and ride facilities) such as at Wildmill Station.</p> <p>The Garw Valley railway is a heritage rail scheme which is operated for leisure rather than for transport purposes.</p> <p>There is a long term aspiration to close the level crossing at Pencoed and replace it with a widened bridge at Penprysg Road which would be development related or via third party funding.</p> <p>Policy SP3 reiterates the strategic transportation schemes which are in the South East Wales Regional Transport Plan. The link between the Garw Valley Community Route at Bryngarw Country Park and the Celtic Trail is included in the draft RTP, The Brewery Field to town centre route can be considered as part of potential future re-development of the Embassy site.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Rail: Greater frequency on Maesteg line is welcome as is Brackla Station. However, no mention in greater service frequency from Pencoed. • Principles do not ensure a full integrated transport network for Bridgend. There must be links between all and not just the key settlements. • In order to travel sustainably to the 4 main development areas, further plans that go beyond the RTP will need to be put in place. <p>SP4: Conservation of the Natural Environment</p> <ul style="list-style-type: none"> • monitoring: delete "non-essential" from indicator. <p>SP5: Conservation of the Built and Historic Environment</p> <ul style="list-style-type: none"> • Disused railway and tram lines should be safeguarded for future sustainable walking and cycling routes. • Is manor house at Plas - y- betws on the at risk register? <p>SP6: Minerals Supply</p> <ul style="list-style-type: none"> • Suggested amendments to policy: Coal in centre and north of County Borough. • Policy as drafted is not consistent with MTAN 1, para 49, which confirms that land banks should be maintained during the entire plan period. In this case, with a plan period of 15 years to 2021, the LDP will need to ensure a minimum 10 year land bank at the end of the plan period. Provides amended Policy wording. • 15 year land bank is too prescriptive. No evidence land banks will be maintained at the end of the plan period. Policy is unsound. Resources are minerals that do not have planning permission and therefore do not count towards the land bank which is a stock of permitted reserves. 	<p>Decisions relating to rail frequencies do not rest with the Council unless they are tied up with infrastructure enhancement.</p> <p>The Council has recently commissioned work to identify the role and function of settlements within the County Borough, part of this study will identify the current connections between settlements. However, it is not practical for every settlement to be directly linked to every other settlement in the County Borough by road or public transport. The use of transport hubs in the major settlements will, however, facilitate easy transfers between services to other settlements within and beyond the County Borough.</p> <p>In line with national policy guidance, some developments are acceptable in the countryside, for example those requiring a countryside location or agricultural / forestry development. It is therefore necessary to include the "non-essential" element to the indicator so that the results do not give an inaccurate picture of the implementation of policy.</p> <p>National planning states that disused railways and should be safeguarded from development where there is a realistic prospect for their use for transport purposes in the future. A policy to protect such routes will be considered for inclusion in the Deposit LDP.</p> <p>The Manor House at Plas y Betws is not on the Buildings at Risk register.</p> <p>This amendment is accepted and will be included in the Deposit LDP.</p> <p>Agree change to Policy in Deposit LDP by referring to resources as opposed to land bank. Whilst the Council must identify sufficient resources to ensure a 15 year supply throughout the plan period to 2021, the onus is on mineral operators to seek planning permission for mineral extraction.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>SP7: Minerals Protection</p> <ul style="list-style-type: none"> • para 9.3.6 suggests the national policy requirements will be satisfied. However Policy only protects coal resources and not aggregate. MPAs are required to safeguard these resources in their development plans and make it clear whether or not it will be acceptable for the resource to be exploited during the plan and what criteria future proposals will be judged. SP7 is therefore not in accordance with national policy and fails soundness test C2. • Policy as drafted is not consistent with National Policy and is incorrect in requiring separation zones around what are ill-defined "relevant environmental designations. Provides amended Policy wording • Buffer zone distance needs to be altered to 500m. • Suggested amendments to policy: All primary, secondary and tertiary coal resources located outside of settlement boundaries will be safeguarded from built development. • The extraction of valuable mineral resources prior to the development of beneficial after uses will benefit regeneration and avoid unnecessary sterilisation of reserves. Policy does not accord with MTAN2. Para 9.2.34 lacks sufficient detail. • Add new sentence to end: "These buffer zones do not apply to the development areas for Coal Bed Methane extraction". <p>SP9: Energy Generation and Conservation</p> <ul style="list-style-type: none"> • wind farm developments in areas already suffering from problems. Record of poor health in wards with most deprivation. The Coalfield Plateau is a Special landscape area and should remain so. Wind farms will not meet the plans aims to generate tourism and increase standards of living and local wealth. Will also create landscape and visual interruption with a knock on effect to our ecology and heritage. • Policy refers to locally refined search areas. Reference to this should not be included as Council has not adopted refined boundaries as yet and has not consulted upon them. Suggests new wording for policy. • Policy sets inappropriate and unnecessarily high hurdle for development so meet. Wording should reflect the balance of interests needed. 	<p>Aggregate resources will be safeguarded in the deposit plan and a criteria based policy will be included in the Deposit LDP to assess mineral proposals.</p> <p>This policy was drafted in accordance with the <u>draft</u> Coal TAN and will be revised in accordance with the final coal TAN which has now been issued.</p> <p>The LDP is required to reflect local circumstances arising from national planning policy guidance. In the case of the Strategic Search Areas identified in TAN 8: Renewable Energy, the 2006 refinement exercise forms part of the evidence base to the LDP and will be used to inform policies within the Deposit LDP. The LDP PDP also promotes tourism and recreational developments in the Valleys areas as well as protecting areas of landscape importance. These issues will be considered at the point of determining planning applications to ensure that balanced decisions are taken.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>SP11: Retailing and Commercial Centres</p> <ul style="list-style-type: none"> Does not reflect national guidance on new retail development by establishing criteria against which edge and out of centre retail proposals will be assessed against. <p>SP12: Tourism</p> <ul style="list-style-type: none"> Welcomes development of Porthcawl, Maesteg and Upper Llynfi Valley. However, visitors should be encouraged to travel sustainably. <p>SP13: Housing</p> <ul style="list-style-type: none"> The overall housing requirement is generally supported however this should be updated to reflect new household projections which will become available during 2009. Object to SP13 - no reference to number of dwellings on strategic housing sites, nor does it identify opportunities for new site allocations. The policy as drafted suggests all 8,100 dwellings required will only be met through 4 strategic sites. Policy SP13 should be amended to ensure the Policy reflects the emerging proposals within the Brackla Regeneration Proposals. <p>SP14: Community Uses</p> <ul style="list-style-type: none"> Policy states existing community facilities will be retained and enhanced; whereas in respect of NHS modernisation, some health facilities will be closed during the Plan period. Would like inclusion of "The Council will, in principle, regard the former community / public buildings and former commercial / industrial premises located outside residential areas as the most appropriate locations for places of worship and associated community activities. <p>SP15: Infrastructure</p> <ul style="list-style-type: none"> The Policy should make clear the Councils priorities in terms of its policy objectives, in order to set out the policy hierarchy to be applied where land values will not support the requirements of every Policy obligation. The Policy should take full account of its impact on development viability. 	<p>LDPs should not repeat national planning policy unless local variations are required.</p> <p>Policy SP3, the Strategic Transport Planning Principles, apply to all developments including tourism developments, and encourages the use of safe, healthy and sustainable forms of transport.</p> <p>The 2006-based household projections were released in early 2009. The Council is currently reviewing these figures in light of its own projections used in determining future growth options for the County Borough. Reference to, and the implications of, the new 2006-based projections will be included in the Deposit LDP.</p> <p>It was not the intention of Policy SP13 to imply that all 8,100 dwellings would be accommodated on 4 strategic sites. This will be amended by reference to individual housing figures in the Deposit LDP. In addition, non-strategic sites for housing that meet the requirements of the Preferred Strategy will also be identified in the Deposit LDP.</p> <p>NHS Modernisation will enhance community facility provision even if this involves the closure of some not fit-for-purpose buildings. However this may be clarified by changing the word "community facility" to "community facility provision" in the policy.</p> <p>Community facilities should, by their very nature, be located within the residential communities which they serve. It is therefore not appropriate to suggest that they should be located outside of these areas in former commercial / industrial premises.</p> <p>The Council considers that every development site will have its own individual circumstances when considering requirements for policy / infrastructure obligations. It is therefore not seen as appropriate to prioritise one issue over another for every site across the County Borough. Site viability will be an important factor when allocating sites for development in the Deposit LDP, the Council will be undertaking site viability analysis to inform this process.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<ul style="list-style-type: none"> • Appropriate infrastructure must accompany increased development (both sewage and transportation infrastructure). • should refer to organisations such as Reserve Forces and Cadets Association for Wales (RFCA) that are capable of delivering these community facilities. • could be strengthened by the inclusion of greater support for new community facilities that are to be developed by organisations such as the RFCA. <p>Policy Omissions</p> <ul style="list-style-type: none"> • Need for Policy on Mineral extraction proposals. • Inclusion of overarching climate change Policy. • Promote awareness of climate and weather change. Sustainability. The Environment. Wildlife. Natural World. Forest, woodlands, rivers and storms. Waste management and preservation. Farming - food limitations. Energy - all aspects. Coastal erosion. • Would like to see a green space within Bridgend Town Centre. • TAN8 SSA represents national spatial policy and should be represented on Map 10: Strategic Diagram. • There is a need for a strategic policy for sustainable energy. Specific policy wordings have been suggested for Sustainable Energy, Onshore Gas extraction and Coal Bed Methane (CBM) extraction policies. These will enable the Council to properly determine CBM applications. 	<p>Policy SP15 covers this provision.</p> <p>Whilst the Council encourages the provision of infrastructure and/or community facilities associated with new developments it is not appropriate to refer to individual organisations in the wording of its policies as the relevant parties involved will change on a case-by-case basis.</p> <p>A criteria based mineral policy will be included in the Deposit LDP.</p> <p>The LDP is subject to the Strategic Environmental Assessment which is used to inform the plan to ensure it is sustainable and takes account of climate change issues. There is therefore no need to have a single climate change policy in the LDP as this is an overarching consideration for the Plan which will be embedded in future proposals in the deposit.</p> <p>The Deposit LDP will include specific allocations for uses within Bridgend Town Centre. The Council will shortly be undertaking a Master planning exercise for the town centre which may include proposals for green space. Recommendations arising from the Master planning exercise will be included in the Deposit LDP where appropriate.</p> <p>The LDP is required to reflect local circumstances arising from national planning policy guidance. In the case of the Strategic Search Areas identified in TAN 8: Renewable Energy, the 2006 refinement exercise forms part of the evidence base to the LDP and will be used to inform policies and allocations within the Deposit LDP.</p> <p>Such locally occurring sources of energy would need to be considered on its merits at planning application and master planning stage, balanced against the requirements to combat implications of climate change.</p> <p>The Strategy and Strategic Policies do not preclude a broad range of energy solutions. Solution at planning application stage and for allocations will acknowledge local circumstances.</p>

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>General Comment</p> <ul style="list-style-type: none"> We feel the policies have been historically influenced and do not cater for demand which we see regularly through our dealings with those representing local and national retailers, manufacturers, service centre providers. 	<p>The existing planning policy framework and allocations in the County Borough (i.e. the adopted UDP) will be reassessed before inclusion within the Deposit LDP. However, the Council acknowledges there are a number of committed sites which need to be recognised in the LDP, in order to present a realistic framework of the current and future planning situation in Bridgend.</p>

LDP Structure

Summary of Representations Received	Council's Initial Response and Identified Actions for Deposit LDP
<p>Supplementary Planning Guidance</p> <ul style="list-style-type: none"> • New Supplementary Planning Guidance (SPG) documents were suggested on the following issues: - Outdoor Recreation - Footpath Design - Countryside and Motorised Sport - Dogs in the Countryside - Community and Religious Meeting Places - Minerals - Sustainable Drainage Systems (SUDS) - Water Framework Directive 	<p>The Council is grateful for the suggestions of topic areas for Supplementary Planning Guidance to the LDP. Once more details of work has been undertaken with respect to the Deposit LDP and it is published, it will be clearer where policy will need to be expanded upon in additional guidance documents where these are appropriate land use matters. This will include a review of the existing suite of SPGs.</p>

Appendix 4: Specific Consultee Notification Letter

**Pennaeth Adfywio a Datblygu
Y Gyfarwyddiaeth Cymunedau**

Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr
Swyddfeydd Dinesig
Stryd yr Angel
PEN-Y-BONT AR OGWR
CF31 4WB

Ffôn: 01656 **643643**
Ffacs: 01656 **668249**

Gwefan: www.bridgend.gov.uk

**Head of Regeneration & Development
Communities Directorate**

Bridgend County Borough Council
Civic Offices
Angel Street
BRIDGEND
CF31 4WB

Telephone: 01656 **643643**
Fax: 01656 **668249**

Website: www.bridgend.gov.uk

Direct line / *Deialu Uniongyrchol*: 01656 643670

Ask for / *Gofynnwch am* : Development Planning

Our Ref / *Ein cyf*: 315A158E/SAI

Your Ref / *Ein cyf*:

Date / *Dyddiad*: As postmark

Dear Sir / Madam

**Bridgend Local Development Plan: Pre Deposit Proposals Statutory Public Consultation
12th February – 31st March 2009**

I am writing to inform you of the forthcoming consultation on the Pre Deposit Proposals for the Bridgend Local Development Plan (LDP) which will take place between 12th February and 31st March 2009.

The *Bridgend LDP Pre Deposit Proposals* document contains a Vision, Objectives, Growth Options, Spatial Strategies and Preferred Strategy including Strategic Policies. It was approved for consultation by Bridgend County Borough Council on 11th December 2008.

The Pre-Deposit Proposals have also been the subject of an independent Initial Sustainability Appraisal (SA) (which incorporates the Strategic Environmental Assessment (SEA)) and have been screened for a Habitats Regulations Assessment (HRA).

All the documents can be viewed on a computer using the enclosed CD. Copies are also available to inspect at every library in the County Borough as well as at the Customer Service Centre at the Civic Offices, Angel Street, Bridgend. Additional representation forms are available from all the above locations and representations can be made directly on-line via the website. A copy of the consultation Statutory notice is attached to the reverse side of this letter, together with information relating to Consultation exhibitions and drop-in sessions where the documentation may be viewed and where officers will be available to answer any questions.

If you wish to comment on the Pre-Deposit Proposals we would be grateful if you would use the official form enclosed and that it is received by **5:00pm on 31st March 2009**. Any comments received after this deadline will not be accepted

If you have any queries, please contact the Development Planning Team on (01656) 643670.

Yours faithfully



Group Manager – Development
enc.

Appendix 5: LDP Consultation Database Notification Letter

**Pennaeth Adfywio a Datblygu
Y Gyfarwyddiaeth Cymunedau**

Cyngor Bwrdeistref Sirol Pen-y-bont ar Ogwr
Swyddfeydd Dinesig
Stryd yr Angel
PEN-Y-BONT AR OGWR
CF31 4WB

Ffôn: 01656 **643643**
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Ask for / *Gofynnwch am* : Development Planning

Our Ref / *Ein cyf*: 315A158E/SAI

Your Ref / *Ein cyf*:

Date / *Dyddiad*: As postmark

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12th February – 31st March 2009**

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All the documents can be viewed online at the Council's website: www.bridgend.gov.uk. Copies are available to inspect at every library in the County Borough as well as at the Customer Service Centre at the Civic Offices, Angel Street, Bridgend. Additional representation forms are available from all the above locations and representations can be made directly on-line via the website. A copy of the consultation Statutory notice is attached to the reverse side of this letter, together with information relating to Consultation exhibitions and drop-in sessions where the documentation may be viewed and where officers will be available to answer any questions.

If you wish to comment on the Pre-Deposit Proposals we would be grateful if you would use the official form enclosed and that it is received by **5:00pm on 31st March 2009**. Any comments received after this deadline will not be accepted.

The Bridgend LDP Delivery Agreement was revised in October 2008. Copies of the revised document are also available to view at all of the above locations.

If you have any queries, please contact the Development Planning Team on (01656) 643670.

Yours faithfully



Group Manager – Development

Appendix 6: Representation Form



FOR OFFICE USE ONLY	
Date Received:	Acknowledged:
2 0 0	2 0 0
Reference/Representation Numbers:	

SECTION 2 - AGENTS DETAILS

Name of Agent (if appropriate): _____ **Client's Name:** _____

Person to Contact: _____

Address: _____

Postcode: _____ **Telephone No:** _____ **Fax No:** _____

E-mail: _____ **Please specify your preferred method of communication: Letter [] E-mail []**

Note that if agents details are included, all correspondence will be sent to the agent and not to the persons/organisations given in Section 1

SECTION 3 - COMMENTS ON PRE-DEPOSIT PROPOSALS

Q1. Do you agree that all of the key national, regional and local needs and issues that have land use implications have been identified in Chapter 5 and that they take account of the key environmental, social and economic trends identified in Chapter 3 and the relevant policies considered in Chapter 4?

Please specify: Yes [] No [] Don't Know []

If you answered No, what other key needs and issues are missing that should be considered?

(Continue on a separate sheet if necessary)

Q2. Do you agree that the LDP Vision and objectives in Chapter 6 reflect the aspirations of the community strategy and adequately address the needs and issues identified?

Please specify: Yes [] No [] Don't Know []

If you answered No, what additional objectives need to be considered and/or how does the LDP Vision need to be amended?

(Continue on a separate sheet if necessary)

Q3. Do you agree that the Preferred Growth option in Chapter 7 is the most appropriate to meet the social, economic and environmental needs and objectives identified in the plan?

Please specify: Yes [] No [] Don't Know []

If you answered No, what do you feel should be the most appropriate level of growth?

(Continue on a separate sheet if necessary)

SECTION 3 (Continued) - COMMENTS ON PRE-DEPOSIT PROPOSALS

Q4. Do you agree that the Preferred Spatial Strategy in Chapter 8 is the most appropriate means of distributing growth in the County Borough?

Please specify: Yes [] No [] Don't Know []

If you answered No, what do you consider to be the most appropriate spatial strategy?

(Continue on a separate sheet if necessary)

Q5. Do you agree that the Preferred Strategy and Strategic Policies set out in Chapter 9 and illustrated in the Strategic Diagram provide a proper framework for the delivery of the LDP's vision and strategic objectives?

Please specify: Yes [] No [] Don't Know []

If you answered No, please give reasons

(Continue on a separate sheet if necessary)

Q6. Do you agree with the proposed structure of the future Deposit LDP and the programme for the review and production of Supplementary Planning Guidance identified in Chapter 10?

Please specify: Yes [] No [] Don't Know []

If you answered No, what matters need to be considered in the Deposit LDP or what additional Supplementary Planning Guidance should be considered?

(Continue on a separate sheet if necessary)

Q7. If you have any further comments or suggestions on the Pre-Deposit Proposals document, please submit them below.

(Continue on a separate sheet if necessary)

Appendix 7: Public Notice and Media Release



PLANNING AND COMPULSORY PURCHASE ACT 2004
THE ENVIRONMENTAL ASSESSMENT OF PLANS AND
PROGRAMMES (WALES) REGULATIONS 2004
THE TOWN & COUNTRY PLANNING (LOCAL DEVELOPMENT PLAN)
(WALES) REGULATIONS 2005 (REGULATION 15)



**Notice of Pre-Deposit Public Consultation for a
Local Development Plan**

BRIDGEND LOCAL DEVELOPMENT PLAN 2006-2021

Bridgend County Borough Council has prepared pre-deposit proposals documents for the above plan. The Local Development Plan (LDP) will, upon adoption, replace the current development plan and be the basis for decisions on land use planning for Bridgend County Borough.

The pre-deposit proposals documents outline the Authority's vision, strategic options, preferred strategy and key policies, and include key background information and an initial sustainability appraisal report (which includes the environmental report).

Copies of the document are available for public inspection free of charge at:-

The Customer Service Centre, Bridgend County Borough Council, Civic Offices, Angel Street, Bridgend, CF31 4WB **from 8.00am to 7.00pm Mondays to Fridays** and at all Public Libraries in the County Borough during their normal opening hours, details of which can either be obtained from the Council's website, or by contacting the relevant library **from Thursday 12th February 2009 to Tuesday 31st March 2009**. They are also available on the Council's website at www.bridgend.gov.uk/planning

Representations (including objections) in respect of the proposals should be sent on the prescribed form in writing to: Group Manager - Development, Bridgend County Borough Council, Civic Offices, Angel Street, Bridgend, CF31 4WB or by email to: planning@bridgend.gov.uk or online via www.bridgend.gov.uk/planning **and be received at the Council before 5.00pm on 31st March 2009**.

Representations (including objections) should specify the matters to which they relate. **Representations received after 5.00pm on 31st March 2009 will not be considered.** The prescribed form for making representations is available at the deposit locations listed above, or online at the Council's website at www.bridgend.gov.uk/planning

Representations which are properly made, and duly submitted within the specified consultation period, will be acknowledged and reported in an appropriate manner to Council for its consideration.

Representations may be accompanied by a request to be notified at a specified address of the next stage of the LDP and/or that the LDP has been submitted to the Welsh Assembly Government for independent examination and/or of the adoption of the plan.

The Authority is only required to consider representations made in accordance with this notice. Representations made at the current pre-deposit stage will not be considered by the Inspector appointed to carry out the Independent Examination. There will be a further opportunity for representations to be made at the deposit stage and these representations will be considered at the examination.

Further information on the LDP process and relevant background documents are available on the Council's website at www.bridgend.gov.uk/planning

Louise Fradd
Corporate Director - Communities
DATED 12/02/2009

Media Release

I'r Cyfryngau



REF: MR10.02.09LR

10 February 2009

Have your say on local development

Bridgend County Borough Council is asking local residents for their opinions over a strategy which will decide what sort of development takes place in the area between now and the year 2021.

The Local Development Plan Strategy sets out how much growth can take place and how land is distributed for purposes such as housing, employment, retail, education and open space. It will also feature policies that the council will use when making decisions over future planning applications.

The plan is currently at a pre-deposit stage and a series of exhibitions and drop-in sessions have been organised to give local residents and landowners an opportunity to find out more information, view the plans in detail and let the council know what they think about the proposals.

Councillor John Spanswick, Cabinet Member for Communities, said: "The Local Development Plan is something that could potentially have an effect on the lives of each and every person in Bridgend County Borough.

"It will determine exactly what sort of developments will take place in local communities. That's why we want to give everyone an opportunity to have their say and help the proposals take shape."

A Local Development Plan exhibition will be available at the following venues:

- Friday 13 and Saturday 14 February – Caroline Street, Bridgend Town Centre 9am – 5pm
- Saturday 14 February - Tesco, Maesteg 9am - 5pm
- Friday 20 February - Bridgend Bus Station 9am - 6pm
- Saturday 21 February - Rhiw Shopping Centre, Bridgend 9am 5.30pm
- Friday 27 February - Porthcawl Tourist Information Centre 9am - 4.30pm
- Monday 2 March - Pontycymmer OAP Centre, Oxford Street 9am - 6pm
- Tuesday 3 March - Noddfa Chapel, Caerau 9am - 5pm

More...

Community drop-in sessions will also provide an opportunity to discuss the proposals with officers in more detail. These will be available at:

- Monday 16 February - Ynysawdre Pool, 11am - 7pm
- Tuesday 17 February - Pencoed Welfare Hall 11am - 4.30pm
- Wednesday 18 February - Pyle Life Centre, 11am - 6pm
- Monday 23 February - Blaengarw Workmen's Hall, 11am - 6pm
- Tuesday 24 February - BAVO, Commercial Street, Maesteg, 11am - 4.30pm
- Thursday 26 February - Ogmore Life Centre, 11am - 6pm
- Saturday 28 February - Porthcawl Tourist Information Centre, 11am - 4pm
- Friday 6 March - Civic Offices, Customer Service Centre 11am - 7pm

The consultation period runs from 12 February until 5pm on 31 March 2009. To view the proposals online, visit the planning pages of www.bridgend.gov.uk. You can also view them at your local library or at the Customer Service Centre in the Civic Offices, Angel Street, Bridgend.

For more information, call 01656 643670 or email planning@bridgend.gov.uk

Ends - for more information please contact the Public Relations team on (01656) 643217, 643663 or 643210. Website: www.bridgend.gov.uk Email: talktous@bridgend.gov.uk

Appendix 8: *Planning Our Future* Summary Newsletter

Planning Our Future

www.bridgend.gov.uk



The Bridgend Local Development Plan Newsletter

January 2009



Welcome

to the first edition of **Planning Our Future**, a newsletter created by **Bridgend County Borough Council** to keep residents informed about the progress of the **Bridgend Local Development Plan**.

The Local Development Plan will determine what developments will take place in Bridgend County Borough up until the year 2021. Please take a few moments to read this newsletter and tell us what you think.

This first issue of **Planning Our Future** focuses on public consultation for the Local Development Plan's Pre-Deposit Proposals, a document which outlines the plan's vision, objectives and preferred strategy.

The following is a summary of the contents of the proposals. It provides details about where you can view the documents and explains how you can give us your comments.



What is the Local Development Plan?

The Local Development Plan (LDP) is a statutory document which sets out the council's planning policies for how land will be used in Bridgend County Borough up until the year 2021.

As well as guiding and promoting development which is in the public interest, the LDP will be used when making decisions over planning applications.

The policies will cover how land is allocated for different types of development such as housing, retail, education and open space. They will also provide criteria for assessing individual proposals.

As a result, the LDP could potentially have a direct effect on the lives of every resident of Bridgend County Borough, and major implications for landowners and developers.

What is happening now?

Bridgend County Borough Council has prepared Pre-Deposit Proposals for the LDP. The proposals contain information about important national, regional and local planning issues, gathered through established evidence and local consultation.

This information has been used to develop a vision, strategic objectives and a preferred strategy for the LDP, which would be implemented through the development of strategic policies.

The council has agreed how much development should take place up to 2021 and generally where in the county borough development should take place.

Now we want to know what YOU think about it.

Please note that as the proposals are strategic at this stage, the document does not currently allocate specific boundaries for towns and villages.

It also does not contain detailed policies for managing developments or detailed land use allocations, although it does feature significant strategic development proposals that help to fulfil the aims of the strategy.

All of these matters will be included in the full (deposit) Bridgend Local Development Plan which is scheduled to be produced in 2010.

Turn over to find out more.

Local Development Plan Strategy

Vision

Bridgend County Borough Council's land use vision for the LDP is that:

"By 2021, Bridgend County Borough will be transformed to become a sustainable, safe, healthy and inclusive network of communities comprising strong, interdependent and connected settlements with improved quality of life and opportunities for all people living, working, visiting and relaxing in the area.

The catalysts for this transformation will be:

- a successful regional employment, commercial and service centre in Bridgend
- a vibrant waterfront and tourist destination in Porthcawl
- a revitalised Maesteg
- thriving Valley communities"



Themes

The Pre-Deposit Proposals are based around the following four themes derived from the Bridgend Community Strategy.

One: To produce high quality sustainable places

The objectives for this theme are:

- To promote Bridgend town as a regional hub and the key principal settlement.
- To revitalise Maesteg by recognising its role as the principal settlement serving the Llynfi Valley.
- To realise the potential of Porthcawl as a premier seaside and tourist destination.
- To realise the strategic potential of the Valleys Gateway to provide for future development and facilities serving the whole of Bridgend County Borough.
- To reduce traffic growth, congestion and commuting levels while promoting the safe and efficient use of the transport network through integrated transport solutions and measures.

The LDP strategy requires:

- All development to meet sustainable place making principles.
- All development to meet strategic transport planning principles.



Two: To protect and enhance the environment

The objectives for this theme are:

- To promote, conserve and enhance the natural, historic and built environment of Bridgend County Borough.
- To tackle the sources of poor surface water and air quality.
- To manage development in order to reduce or mitigate against the risk and fear of flooding.
- To meet the council's commitments for mineral resources, waste management and waste disposal.
- To contribute towards the energy needs of Wales with a focus on the promotion of renewable energy.

The LDP strategy requires:

- The protection of sites and buildings that are of acknowledged natural, built and historic interest.
- The safeguarding of areas of aggregates and coal resources.
- Bridgend County Borough to meet its contribution to regional and local waste facilities.
- That Bridgend County Borough contributes towards the country's energy requirements.

Three: To spread prosperity and opportunity through regeneration

The objectives for this theme are:

- To build a more diverse, dynamic and self-reliant economy and business environment.
- To provide a realistic level and variety of employment land.
- To bring the benefits of regeneration to valley communities by directing new development to those areas at an appropriate scale.
- To create sustainable destinations which capitalise upon the environmental assets and tourism potential of the area.
- To enable Bridgend town to become an attractive and successful sub-regional retail and commercial centre.
- To support realistic and viable town and district centres
- To protect and promote the role of smaller shopping centres and freestanding local shops.

The LDP strategy requires:

- The identification and protection of 160 - 170 hectares of employment land.
- The direction of new retail and leisure development to the town and district centres of Bridgend County Borough.
- The encouragement of high quality sustainable tourism.

Four: To create safe, healthy and inclusive communities

The objectives for this theme are:

- To provide a land use framework that recognises the needs of deprived areas within Bridgend County Borough, and which gives those communities the opportunities to tackle the sources of their deprivation.
- To ensure that there is equality of access to community services for all sectors of the community.
- To deliver the level and type of residential development to meet the identified needs of Bridgend County Borough, ensuring that a significant proportion is affordable and accessible to all.
- To provide for the required quantity and range of accessible leisure, recreational, health, social and community facilities throughout Bridgend County Borough.

The LDP strategy requires:

- That 8,100 new market and affordable dwellings be accommodated during the LDP period.
- The retention of existing community uses and facilities and the development of new ones where needed.
- That new development is accompanied by an appropriate level of infrastructure.

Delivery

The successful delivery of the LDP strategy relies on three elements.

Firstly, it relies on the implementation of four key strategic regeneration growth areas which will deliver a range of mixed-use developments and facilities at:

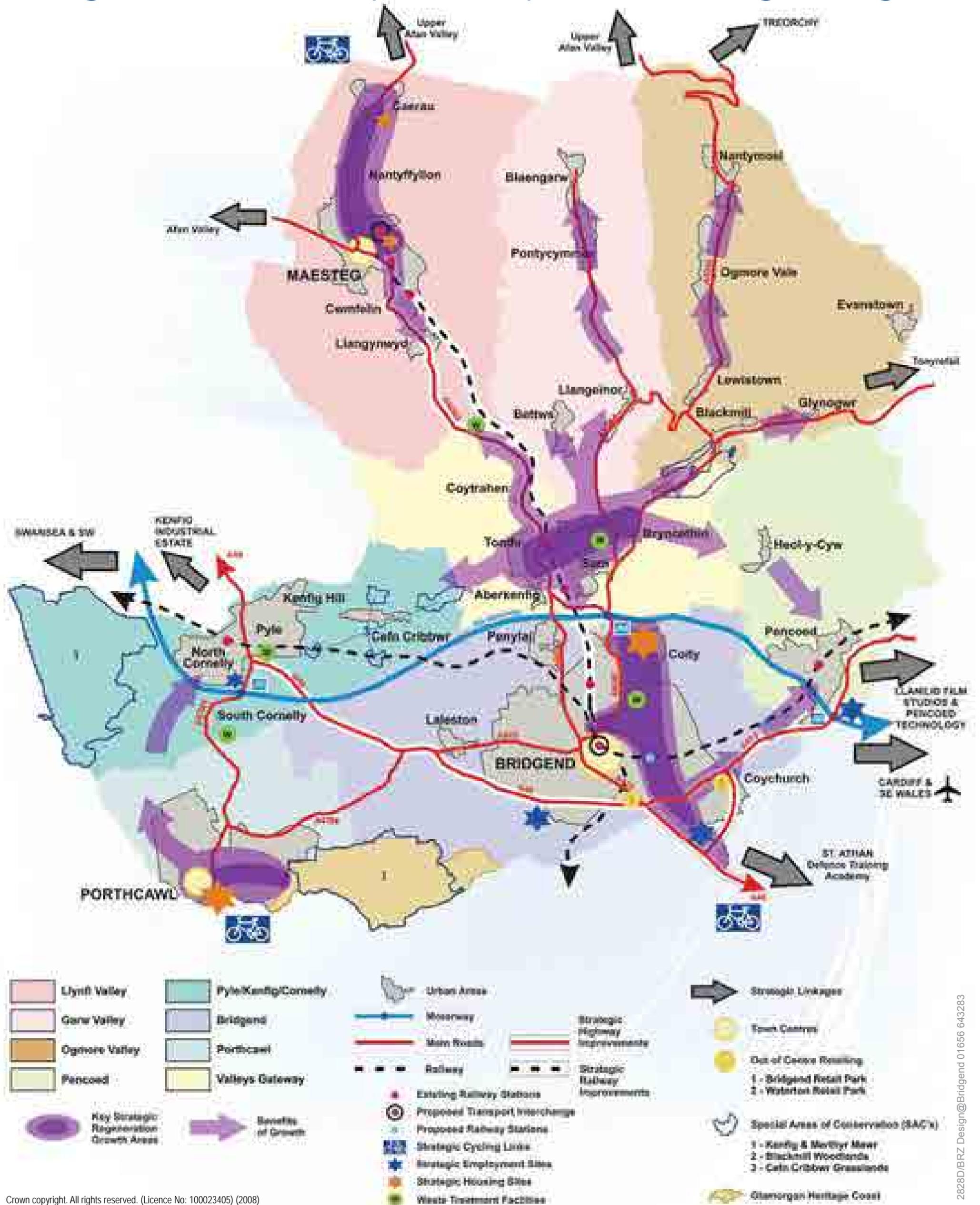
- Porthcawl - including the 7 Bays Project: Porthcawl Waterfront.
- Maesteg and the Upper Llynfi Valley - including the Maesteg Washery and former Coegnant Colliery site.
- The Valleys Gateway - including a range of inter-related private and public opportunities from Tondy westwards to Bryncethin.
- Bridgend - including Parc Derwen and the Brackla Industrial Estate, north east of the town, a new secondary school at Brackla and Parc Afon Ewenni, a gateway redevelopment site along the A473/A48, to the south.

Secondly, it relies on the development of four strategic employment sites at Ty Draw, Island Farm, Brocastle and Pencoed Technology Park, capitalising on their accessibility to the M4 and the strategic highway network.

Thirdly, it relies upon the delivery of other targeted regeneration projects, especially in the Ogmere and Garw Valleys, Pyle/Kenfig/Cornelly and Pencoed.



Bridgend LDP Pre Deposit Proposals Strategic Diagram



How to get involved with the Local Development Plan consultation

Tell us what you think

We want to hear what you think about these proposals. There are a number of ways that you can see the full plans and documents and ask questions to find out how they will affect you.

Please read the full documents before responding to the consultation and making your views known.

The consultation period runs from 12 February to 5.00pm on 31 March 2009.

LDP exhibitions

Come along and see the LDP exhibition which will be touring Bridgend County Borough during the consultation period with displays and information on the proposals.

Date	Location	Time
Saturday 14 February	Tesco, Maesteg	9am - 5pm
Friday 20 February	Bridgend Bus Station	9am - 6pm
Saturday 21 February	Rhiw Shopping Centre, Bridgend	9am - 5.30pm
Friday 27 February	Porthcawl Tourist Information Centre	9am - 4.30pm
Monday 2 March	Pontycymmer OAP Centre, Oxford Street	9am - 6pm
Tuesday 3 March	Noddfa Chapel, Caerau	9am - 5pm

Community drop-in sessions

For a more in-depth look at the proposals, come along to one of our community drop-in sessions. Officers will be available to sit down and go through the proposals with you in detail, discuss how the proposals will affect you and answer any questions that you may have.

Date	Location	Time
Monday 16 February	Ynysawdre Pool	11am - 7pm
Tuesday 17 February	Pencoed Welfare Hall	11am - 4.30pm
Wednesday 18 February	Pyle Life Centre	11am - 6pm
Monday 23 February	Blaengarw Workmen's Hall	11am - 6pm
Tuesday 24 February	BAVO, Commercial Street, Maesteg	11am - 4.30pm
Thursday 26 February	Ogmore Life Centre	11am - 6pm
Saturday 28 February	Porthcawl Tourist Information Centre	11am - 4pm
Friday 6 March	Civic Offices, Customer Service Centre	11am - 7pm



Where can I see the plans in full?

The full documentation is available at the following locations:

- On the planning pages of the council's website, www.bridgend.gov.uk/planning
- At your local library.
- At the council's Customer Service Centre in the Civic Offices, Angel Street, Bridgend.

How can I give my views?

There are a number of ways you can give your views on the proposals:

- You can complete a questionnaire that will be available where the plans are available to view and at the exhibitions and drop-in sessions.
- You can visit www.bridgend.gov.uk/planning and fill in and submit the questionnaire online or download the form to post.
- Email your comments directly to planning@bridgend.gov.uk
- Fax your comments to **01656 643190**.
- Write to: **Group Manager - Development, Bridgend County Borough Council, Civic Offices, Angel Street, Bridgend, CF31 4WB.**

All responses must be received by 5.00pm on 31 March 2009.

What are the next steps?

Once the consultation period has ended, all comments will be presented to Bridgend County Borough Council and any appropriate changes will be made to the preferred LDP strategy.

The final strategy will be incorporated into the full Bridgend Local Development Plan. This will then be subject to another period of public consultation in 2010.

If you require further information, or have any questions, please contact the Development Planning team on 01656 643670 or email planning@bridgend.gov.uk

**Appendix 9: Consultation Poster: Exhibitions and
Drop-In Sessions**

Planning Our Future

Public consultation on the Bridgend Local
Development Plan Pre-Deposit Proposals

12 February - 31 March 2009



The Council has drawn up a strategy for how land should be used until the year 2021 and wants to know what YOU think about it.

A Local Development Plan Exhibition will be calling at the following venues:

Date	Location	Time
Saturday 14 February	Tesco, Maesteg	9am - 5pm
Friday 20 February	Bridgend Bus Station	9am - 6pm
Saturday 21 February	Rhiw Shopping Centre, Bridgend	9am - 5.30pm
Friday 27 February	Porthcawl Tourist Information Centre	9am - 4.30pm
Monday 2 March	Pontycymmer OAP Centre, Oxford Street	9am - 6pm
Tuesday 3 March	Noddfa Chapel, Caerau	9am - 5pm

Or, for a more in-depth look, you can also visit **Community Drop-In Sessions** where officers will be able to go through the proposals in detail, discuss how they will affect you and answer any questions that you may have:

Date	Location	Time
Monday 16 February	Ynysawdre Pool	11am - 7pm
Tuesday 17 February	Pencoed Welfare Hall	11am - 4.30pm
Wednesday 18 February	Pyle Life Centre	11am - 6pm
Monday 23 February	Blaengarw Workmen's Hall	11am - 6pm
Tuesday 24 February	BAVO, Commercial Street, Maesteg	11am - 4.30pm
Thursday 26 February	Ogmore Life Centre	11am - 6pm
Saturday 28 February	Porthcawl Tourist Information Centre	11am - 4pm
Friday 6 March	Civic Offices, Customer Service Centre	11am - 7pm

For further information:

visit www.bridgend.gov.uk/planning

call **01656 643670** or email planning@bridgend.gov.uk

Appendix 10: Exhibition Material

Planning Our Future



What is an LDP?

The Local Development Plan (LDP) is a statutory document which sets out the council's planning policies for how land will be used in Bridgend County Borough up until the year 2021.

As well as guiding and promoting development which is in the public interest, the LDP will be used when taking decisions over planning applications. The policies will cover how land is allocated for different types of development such as housing, employment, retail, education and open space. They will also provide criteria for assessing individual proposals.

As a result, the LDP could potentially have a direct effect on the lives of every resident of Bridgend County Borough, and make implications for businesses and investors.

What is happening now?

Bridgend County Borough Council has prepared Pre-Deposit Proposals for the LDP.

The proposals contain information about important national, regional and local planning issues, gathered through established evidence and local consultation.

This information has been used to develop a vision, strategic objectives and a preferred strategy for the LDP which could be implemented through the development of strategic policies.

The council has agreed how much development should take place up to 2021 and generally where in the County Borough development should take place.

Now we want to know what YOU think about it.

www.bridgend.gov.uk/developmentplan

Local Planning Issues for Bridgend County Borough

Environment Issues

- There are a wide range of important landscapes, nature conservation interests and built and natural environmental assets in the County Borough which require protection.
- There are deficiencies in outdoor and children's playing space provision within the County Borough.
- The landscape requirements of the Spatial and Planning Service Review should be acknowledged.
- The Dama Valley areas are under increasing pressure from proposed wind farm developments.
 - Significant areas along our rivers and along the coast are identified as being at risk from flooding and storm surge tidal inundation.
- More of the County Borough's stretches of rivers are at risk of having poor surface water quality.
 - There is a risk of poor air quality along the M4 corridor.
 - During peak times, the road network of the County Borough experiences severe increase in traffic flows and congestion, with a corresponding impact on road safety.
- There is a concentration of development west of the local crossing in Porthodau due to limited capacity at the present railway crossing.
 - The current road access arrangements to Kertly Industrial Estate adversely affects the amenity, safety and environment of residents of North Cumbry.
- Development proposals pose a threat of stretching high quality marine resources in the County Borough.
- Residential amenity in the vicinity of active quarries should be balanced against the need for aggregates.
- Sites for new waste facilities to meet local and regional needs require identification and protection.
 - No significant wildlife interests exist for waste disposal in the County Borough.



Planning Our Future



Local Planning Issues for Bridgend County Borough

Social Issues

- There is a need to increase the year supply of land for residential development
 - Having offices in the Ogmore and Gwaife valleys is limited
- The amount of land allowing development which has better plans in Manning has not reflected its position as a hub settlement.
- The assessed annual need for affordable housing in the County Borough far exceeds the average annual level of general housing completions
- In the Valley areas and Portcawl there has been limited provision of affordable housing
 - There is a shortfall in the provision of extra care housing and of smaller dwellings.
- Many parts of the County Borough, especially in the valley communities, are among the most deprived areas of Wales
 - The Ogmore Valley does not have an active Regeneration Strategy
 - The Gwaife Valley has poor transport links with the rest of the County Borough and beyond
- The health and care requirements of the Local Health Board and the NHS Trust should be acknowledged
 - The key outcomes and other care requirements of the Soboo's Modernisation Programme should be addressed in the LDP
 - The Valley's Gateway is centrally located and accessible, being the preferred location for many facilities that serve a much wider catchment.

Economic Issues

- The Portcawl Regeneration Strategy will need to be delivered to realise the town as a premier hub. There is also a lack of a major retail representation in Portcawl.
- Our economy is more reliant on the manufacturing sector than in Wales as a whole and employment rates are higher than the national average.
 - There is a mismatch between the current location of employment sites in the County Borough and the areas of higher education.
 - There are currently under-utilised surrounding employment allocations where there is scope to re-use their future use.
- There is a shortage of general employment land in Portcawl, the Valley's Gateway and the Gwaife Valley
- Demand for office and industrial premises up until 2007 was exceeding the supply of land for this purpose
- Bridgend Town Centre is currently under-performing in its role as a sub-regional centre. There is also a need to allocate further land for bulky goods retail development in the south of the County Borough.
 - In the Valley's areas and Pyle Road 188, the leisure centres are dispersed over a wide area with potential to identify core areas of activity.
 - There is a high concentration of A3 bus local uses within Aberkenfig District Centre.
- There is a need to build on the success of smaller retail and community uses at the neighbourhood level (some of which are unprovided and currently unutilised)
 - The natural, historic and built environments of the County Borough presents opportunities for tourism related developments.
 - The majority of visitors to the County Borough only stay for one day. Only a small percentage stay in certified accommodation.

Do YOU agree with these issues?



Planning Our Future



The LDP Vision

Our vision is to create a world-class environment for living, working and playing, where people can enjoy the best of both worlds – the benefits of a vibrant city and the beauty of the natural world.

Themes

The Five-Object Themes are based around the following four strategic themes derived from the Strategic Community Strategy:

One: To promote high quality sustainable growth

The objectives for this theme are:

- 1. To promote growth in a high quality and sustainable manner
- 2. To ensure that the growth is sustainable and that the environment is protected
- 3. To ensure that the growth is sustainable and that the environment is protected
- 4. To ensure that the growth is sustainable and that the environment is protected
- 5. To ensure that the growth is sustainable and that the environment is protected

The LDP strategy requires:

- 1. To ensure that the growth is sustainable and that the environment is protected
- 2. To ensure that the growth is sustainable and that the environment is protected

Two: To protect and enhance the environment

The objectives for this theme are:

- 1. To ensure that the environment is protected and enhanced
- 2. To ensure that the environment is protected and enhanced
- 3. To ensure that the environment is protected and enhanced
- 4. To ensure that the environment is protected and enhanced
- 5. To ensure that the environment is protected and enhanced

The LDP strategy requires:

- 1. To ensure that the environment is protected and enhanced
- 2. To ensure that the environment is protected and enhanced
- 3. To ensure that the environment is protected and enhanced
- 4. To ensure that the environment is protected and enhanced
- 5. To ensure that the environment is protected and enhanced

Three: To boost prosperity and opportunity through regeneration

The objectives for this theme are:

- 1. To ensure that the regeneration is sustainable and that the environment is protected
- 2. To ensure that the regeneration is sustainable and that the environment is protected
- 3. To ensure that the regeneration is sustainable and that the environment is protected
- 4. To ensure that the regeneration is sustainable and that the environment is protected
- 5. To ensure that the regeneration is sustainable and that the environment is protected

The LDP strategy requires:

- 1. To ensure that the regeneration is sustainable and that the environment is protected
- 2. To ensure that the regeneration is sustainable and that the environment is protected
- 3. To ensure that the regeneration is sustainable and that the environment is protected

Four: Create safe, healthy and inclusive communities

The objectives for this theme are:

- 1. To ensure that the communities are safe, healthy and inclusive
- 2. To ensure that the communities are safe, healthy and inclusive
- 3. To ensure that the communities are safe, healthy and inclusive
- 4. To ensure that the communities are safe, healthy and inclusive
- 5. To ensure that the communities are safe, healthy and inclusive

The LDP strategy requires:

- 1. To ensure that the communities are safe, healthy and inclusive
- 2. To ensure that the communities are safe, healthy and inclusive
- 3. To ensure that the communities are safe, healthy and inclusive
- 4. To ensure that the communities are safe, healthy and inclusive



Planning Our Future



Delivery of the LDP

In order to achieve the Vision & Objectives of the LDP, the Council has drafted the **Regeneration-Led Growth Strategy**, which will focus development according to its regeneration priorities, in addition to implementing the Strategic Policies. The sequential delivery of the LDP Strategy will be as follows:

Phase	Key Objectives	Key Deliverables
1. A number of regeneration schemes and initiatives	• To create a number of regeneration schemes and initiatives	• Regeneration-Led Growth Strategy • Regeneration-Led Growth Strategy • Regeneration-Led Growth Strategy
2. To create a number of regeneration schemes and initiatives	• To create a number of regeneration schemes and initiatives	• Regeneration-Led Growth Strategy • Regeneration-Led Growth Strategy • Regeneration-Led Growth Strategy
3. To create a number of regeneration schemes and initiatives	• To create a number of regeneration schemes and initiatives	• Regeneration-Led Growth Strategy • Regeneration-Led Growth Strategy • Regeneration-Led Growth Strategy

How To Get Involved and make Your Views Known

There are a number of ways you can give your views on the proposals:

- You can complete a questionnaire that is available at this website;
- You can visit www.bridgford.gov.uk/planning and fill in and submit the questionnaire online or download the form to post;
- Email your comments directly to planning@bridgford.gov.uk
 - Fax your comments to 01938 643198
- Visit to Group Manager-Development, Bridgford County Borough Council, Civic Offices, Angel Street, Bridgford, CP31 1WB.

All responses must be received by 3.00pm on 31 March 2008



What are the Next Steps?

Once the consultation period has ended, all comments will be presented to Bridgford County Borough Council and any appropriate changes will be made to the proposed LDP strategy.

The final strategy will be incorporated into the full Bridgford Local Development Plan. This will then be subject to another period of public consultation in 2010.

If you require further information, or have any questions, please contact the Development Planning Team on 01938 643670 or email planning@bridgford.gov.uk



Planning Our Future



Strategic Diagram

Legend

	Llynfi Valley		Pyle/Kenfig/Cornelly
	Garw Valley		Bridgend
	Ogmore Valley		Porthcawl
	Pencoed		Valleys Gateway Area

	Key Strategic Regeneration Growth Areas		Benefits of Growth
	Urban Areas		
	Motorway		Strategic Highway Improvements
	Main Roads		Strategic Railway Improvements
	Railway		

	Existing Railway Stations
	Proposed Transport Interchange
	Proposed Railway Stations
	Strategic Cycling Links
	Strategic Employment Sites
	Strategic Housing Sites
	Waste Treatment Facilities
	Strategic Linkages
	Town Centres
	Out of Centre Retailing
	1 - Bridgend Retail Park
	2 - Waterton Retail Park
	Special Areas of Conservation (SAC's)
	1 - Kenfig & Merthyr Mawr
	2 - Blackmill Woodlands
	3 - Cefn Cribbwr Grasslands
	Glamorgan Heritage Coast



Strategic Regeneration Growth Areas

Porthcawl

Key

1. Severn Bays Project Porthcawl Waterfront
2. Pwll-Y-Waun Mixed use development
3. Albert Edward Prince of Wales Court Mixed use development
4. Porthcawl Town Centre Regeneration
5. Newton Bay

Maesteg & the Upper Llynfi Valley

Key

1. Maesteg Washery
2. Maesteg Town Centre Regeneration
3. Maesteg Transport Hub
4. Caerau Regeneration
5. Coengnant Reclamation Area

Valleys Gateway

Key

1. Tondy Mixed Use Regeneration Site
2. Archbishop McGrath/ Ynysawdre Schools Regeneration
3. Maendy Farm
4. Brynmenyn Industrial Estate
5. Former Christie Tyler Site
6. Abergarw Industrial Estate
7. Ogmores School
8. Bryncothlin Depot
9. Sarn Services

Bridgend

Key

1. Parc Derwen
2. Coity Sidings
3. Princess of Wales Hospital
4. Brackla Industrial Estate
5. Brackla School and Facilities
6. Brackla Train Station and Park & Ride
7. Parc Afon Ewenni



BRIDGEND COUNTY
BOROUGH COUNCIL

**Responses to representations
received on the Sustainability
Appraisal of the Bridgend
Local Development Plan Pre
Deposit Proposals & Habitat
Regulations Assessment
Screening**

July 2009



Comments from the Countryside Council for Wales



Cyngor Cefn Gwlad Cymru Countryside Council for Wales

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The Group Manager – Development
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Civic Offices, Angel Street
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Ffôn cyf/Our ref: C:09.97.07/AB/JH

30 March 2009

Dear Sir

BRIDGEND COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN (LDP) – PRE-DEPOSIT PROPOSALS, HRA SCREENING REPORT

Thank you for giving the Countryside Council for Wales (CCW) the opportunity to comment on the HRA screening report for the Bridgend LDP. Our comments are made in the context of our responsibilities under the Conservation (Natural Habitats & c) Regulations 2004 (as amended) and as adviser to the Welsh Assembly Government on the natural heritage of Wales and its coastal waters.

CCW supports and welcomes Bridgend's efforts in undertaking this assessment process. Our specific comments are contained within Annex 1 to this letter. Our general comments follow.

CCW accepts the use of spatial search areas is a useful tool for HRA screening. However, the implementation of a plan may have significant effects on European sites at a considerable spatial distance. This HRA screening should consider potential effects alone and 'in combination' of the Plan for European sites outwith a 15km zone.

Further explanation is required for the elimination of Dunraven Bay SAC, Blaen Cynan SAC, Crymlyn Bog SAC/Ramsar, Coed Nodd a Mollie SAC, Cardiff Beech Woods SAC and Cwm Cadfan SAC from this HRA process.

Should you have any queries regarding our comments, please contact CCW's Regional Team or Kerry Rogers at our Cardiff office.

Yours sincerely

Dr M I Hill
Regional Manager
South and East

cc: Gill Butler, Alison Brown



Gofalw am natur Cymru – ar y tir ac yn y môr • *Caring for our natural heritage – on land and in the sea*

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ANNEX 1

HRA SCREENING, BRIDGEND LDP

1.4 It should be noted that while the amended Conservation Regulations refer to assessment of "land use plans", the Habitats Directive (Art 6(3)) refers to "any plan". CCW would suggest that further adjustments may yet be required to the Conservation Regulations.

3.0 Identification of European Sites. CCW accepts the use of a 15 km search area is useful for the purpose of initial screening. However, the implementation of a plan or project may have significant effects (above or in combination) on European sites at considerable spatial distance from the plan or project area. The potential for spatially distant effects needs to be considered in terms of "in combination" effects and in the context of natural goods, services and resources exploited by the Plan, eg water discharge, water resources, etc.

3.3 Further explanation/justification is required on the elimination of Dunraven Bay Sac, Blaen Cynan Sac, Crynlyn Bog SAC/Ramsar, Coed Nedd a Melite SAC, Cardiff Beech Woods SAC and Cwm Cadfan SAC from the HRA process. The aim of the HRA screening process is to clearly demonstrate the likelihood of significant effects (otherwise) of a plan/project on a European site.

As discussed in Section 3, the potential effects of a plan/project are not determined by spatial distance. In addition, the potential effects of a plan are not necessarily confined to allocated development.

CCW would suggest that further justification is required for the exclusion of European sites from the requirement for "appropriate assessment" and that this report acknowledges and makes a commitment to "re-screen" as plan policies and allocations develop.

3.4 With regard to "buffer zones" see comments on 3.0 and 3.3 above.

4.2 You should note that, in relation to Kenfig SAC, all the features listed are primary features for selection but the fixed dunes are a priority feature. In addition, while erosion of the dune faces is an issue for certain areas of the site, dune stabilisation is also a significant management issue, ie the situation is more complex than just insufficient sediment supply.

5.2 Additional impacts may result from transport and infrastructure policies. Consideration needs to be given to potential effects of servicing new development, eg water supply and discharge.

6.1 CCW welcomes the commitment to reconsider the assessment. Clarification is required as to whether the HRA screening will be reconsidered as policies develop.

6.2/Appendix 4

CCW notes the statement that "impacts on Dunraven Bay SAC are unlikely". This discussion appears to contradict the discussion on Dunraven Bay within Appendix 4 which identifies the potential for a number of adverse effects. Clarification is required as to whether screening has considered potential "in combination" effects with other plans/projects.

- 6.5 CCW agrees that Blackmill Woodlands SAC should be subject to further assessment.
- 6.6 CCW agrees that Kenfig SAC should be subject to further assessment. 'In combination' effects with other plans and programmes must also be considered.
- 6.7 FCW agrees that the Cefn Cribwr Grasslands SAC should be subject to further assessment.
- 6.8 See comments on 6.1.
- 6.9 A number of plans/projects have the potential to engender 'in combination' effects including the Wales Spatial Plan, Regional Transport and Waste Plans, Water Resource Management Plans, etc. CCW would suggest consideration of 'in combination' effects should not be restricted to LDPs. 'In combination' effects of projects have not been considered in this report.

Appendix 2

See comments on Section 3 with respect to "buffer zones".

Appendix 3

CCW is disappointed that only a limited number of sites are included within this Appendix. Further to our comments in 3.3 of this report, justification is required as to why other sites within and/or potentially affected by the Bridgend LDP have been screened out of this assessment.

Appendix 4

See comments on 3.3 and 6.2.



Cyngor Cefn Gwlad Cymru Countryside Council for Wales

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30 March 2009

Dear Sir

BRIDGEND COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN (LDP) PRE-DEPOSIT PROPOSALS CONSULTATION ON SUSTAINABILITY APPRAISAL MARCH 2009

Thank you for giving the Countryside Council for Wales (CCW) the opportunity to comment on the Sustainability Appraisal/Strategic Environmental Assessment for the draft Pre-Deposit LDP. Our comments are made in the context of our role as a consultant body under the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 and as advisers to the Welsh Assembly Government on the natural heritage of Wales and its coastal waters.

In general, CCW acknowledges the continuing engagement of Bridgend CBC with the SA/SEA process and welcomes many of the recommendations of the SA report, particularly in relation to the assessment of strategic policies. However, we have some significant concerns with the process as it has been carried out, which are summarised below. Our detailed comments are attached in Annex 1 to this letter and our comments on the Habitats Regulations Assessment (HRA), submitted as part of the consultation on the LDP process, will be made separately.

CCW welcomes the acknowledgement that the Strategic Environmental Assessment (SEA) process is separate to, but contained within, the Sustainability Appraisal (SA) carried out on the Bridgend LDP. However, it is important to identify where the assessment process meets the requirements of the SEA regulations within the SA report, and that where evaluations or justifications are being made on the basis of SA criteria. The current SA appraisal does not always do this, which leads to a lack of clarity regarding assessment of the significant environmental aspects of the LDP and, at times, may appear to undermine or devalue the SEA process itself.

The SA/SEA process must also show how it has taken on board the comments of the statutory consultees. It is not clear that this has been the case in the current document and we look forward to seeing how the future iterations of the SA/SEA incorporates both the following comments and those made to previous consultations.



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Prif Swyddfai/headquarters

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The SEA (and HRA) process is intended to 'provide for a high level of environmental protection' (Article 1 of the SEA Directive) and therefore ensure that the potential significant environmental effects of the plan being assessed are identified and, where positive, enhanced and when negative, minimised and mitigated. It is also intended to identify a clear baseline from which to measure changes, explore alternatives and identify gaps in knowledge or understanding which will require monitoring as the plan is implemented. To achieve this, the plan must incorporate the findings of the assessment process, where possible, or clearly justify why this is not the case and what alternative steps are being made to address the issues raised. This is a requirement as set out in the Regulations and Government guidance (A Practical Guide to the Strategic Environmental Assessment (SEA) Directive, ODPM, 2005). The SA/SEA process is an iterative one and there should be ample opportunity for SA/SEA and the Plan to change to take account of the developing SEA process. We acknowledge and welcome that some changes have already been made to the LDP as a result of the assessment process, but CCW will be looking forward to seeing how the issues identified, and recommendations made, in the SA/SEA, are fully incorporated into the final Plan.

The SA/SEA process should be an integrated approach (Local Development Plans Wales, Welsh Assembly Government, 2005) but it is of some concern that certain elements of the assessment process seem to have been carried out separately to the SA/SEA and therefore do not form part of this report. We would strongly recommend that SA report contains all relevant elements of the appraisal process.

The SA/SEA process is intended to be initiated at the earliest stages of Plan development, thereby allowing all the alternatives and options to be fully appraised. We note, however, that a number of "existing commitments" have resulted in some options being deemed as unachievable and therefore outside the scope of the SA/SEA. It is important to identify what exactly the nature of such existing commitments are, as CCW considers that existing allocations within current local plans that do not have planning permission should not simply be rolled forward, but should be reviewed through the SEA process to ensure that they are sustainable. Even when development is already committed it should still be considered in the context of the Regulations' requirement to consider, cumulative, in-combination and synergistic effects. We, therefore seek clarification on the nature of these "existing commitments" as matter of some urgency.

I hope you find these comments helpful. Please do not hesitate to contact Gill Barter or Kerry Rogers in the first instance if you wish to discuss this response further.

Yours sincerely



Dr M Hill
Regional Manager South and East

cc Bakers Associates

Annex 1 Detailed: Comments on the Bridgend CBC Pre Deposit Local Development Plan Sustainability Appraisal Report

2 Approach to the Sustainability Appraisal

2.1 – 2.4 CCW fully appreciates that the Sustainability Appraisal (SA) incorporates the Strategic Environmental Assessment (SEA) process. We also appreciate that there is a certain degree of flexibility within the SA/SEA process, partly to enable the uncertainties and complexities identified in this appraisal report to be dealt with. However, it is important that the requirements of the SEA regulations are clearly identified within the SA report, particularly where an evaluation of a policy, option or allocation is being made against SA criteria which may not fully reflect the full scope, aims and objectives of the SEA Regulations (2.2). The SA process is fully compatible with the SEA Regulations so this should not be an onerous task, however, it is important that the economic and social values at the core of the SA process do not unintentionally imbalance or mask the environmental criteria as set out in the SEA Regulations. The process must ensure that the evaluation is capable of identifying the significant environmental effects of the plan, and where these effects are potentially negative, appropriate measures recommended to address the potential adverse effects of the subject (policy, allocation, strategy etc.) being assessed.

2.6 Scoping – While it is not a requirement for the SA report to set out how comments and recommendations made at the formal SEA scoping stage have been incorporated into the Plan development process, including such a “change log” does provide a straightforward and transparent method for demonstrating that this has been done. We note that this was included (appendix 3) in an updated scoping report produced in December 2006, on which we were not consulted, though we also note that this does not demonstrate how recommendations have been incorporated into the LDP itself. CCW would welcome this being done as part of the process outlined in 2.10 in future iterations of this report.

2.8 Initial SA of the Growth Options Report - We are somewhat concerned that the assessment of growth options seems to have been restricted by the roll forward of “existing commitments” thereby rendering the lowest growth option unachievable. The SA and SEA process is intended to be initiated at the earliest stages of the Plan development process, allowing all the alternatives and options to be fully assessed. It is important to identify exactly what “roll[ed] forward” means in this context, as CCW considers that existing allocations within the Unitary Development Plan that do not have planning permission should not be simply rolled forward, but should be reviewed through the SEA process to ensure that they are sustainable. We consider this to be the case even if the UDP in question underwent a “retrospective” SEA of its own. Even when development is already committed, it should still be considered in the context of the Regulations’ requirement to consider, cumulative, in-combination and synergistic effects. We, therefore seek clarification on the nature of these “existing commitments” as a matter of some urgency as they may necessitate a significant re-evaluation of the strategic growth options.

3 Sustainability Objectives

3.1 – As we clearly stated in our previous response to the SA/SEA Scoping consultation (September 2006) CCW has strong reservations over the application of the objectives developed for the Unitary Development Plan SA to the LDP.

In addition, we are unconvinced that the process behind the development of these SA objectives takes fully into account the legal requirements of the SEA Regulations. While we note that many of the aspect areas identified in Annex 1 of the SEA Directive are now adequately covered in the suite of SA objectives, our previous comments and concerns must remain.

3.2 - 3.3 In our response to the Bridgend SA/SEA scoping report (September 2006) we recommended a further 43 plans, policies or programmes which we felt the SA/SEA should take into consideration. There is no reference to whether these plans were considered or any further indication as to how the SA/SEA has taken into account the secondary, cumulative, synergistic, short, medium and long-term permanent and temporary, positive and negative effects of these other plans, policies and programmes. We note that an explanation of the process, as well as a full list of the baseline characteristics, is available (BLP4). However, as we have no record of having been formally consulted on this, the inclusion of an annex to this document listing the key elements of this scoping report, and how it has influenced the selection and drafting of the objectives, would have been both useful and expected.

3.4 - 3.10 CCW acknowledge the importance of sustainable development and its application through the Sustainability Assessment process, to the LDP. However, while the SA process is fully compatible with the SEA process, it is not identical and this section of the report should clearly set out how the requirements of the SEA Regulations have been complied with. As it currently stands this is not the case.

3.11 While it is appreciated that developing objectives, identifying indicators and quantifying targets is not easy or straightforward, it is an important part of the SEA evaluation process. Indicators will change as the plan develops and the assessment is refined; final targets will be amended, added or removed depending on how the plan reacts to the SEA and the significant effects are narrowed down. Ultimately, only a small number of indicators and targets may be taken forward from the SEA process to the final iteration of the plan to measure its predicted environmental effects. The current form of the objectives, while helpfully clarified by the sub-objectives, make it difficult to see how any of the environmental impacts have been evaluated. This is clearly illustrated when these are applied to the LDP objectives, which have no negative sustainability elements identified for them. While it is highly commendable that the LDP objectives fully embrace all aspects of sustainable development we find it unlikely that no potential negative environmental aspects are contained within them.

The descriptive methodology used, without clear reference to the objectives, is also of some concern. Without applying some form of evaluation, related to the SA objectives, it is very difficult to see how any significant environmental effects resulting from the various elements of the LDP have been identified. While we appreciate that indicators will be identified as part of the development of the monitoring framework, this will not assist in identifying, quantifying or enhancing/avoiding/mitigating the significant environmental effects of these elements of the plan at the evaluation stage. Given this, we seek reassurance that the current methodology, as it stands, effectively meets the requirements of the SEA Regulations.

3.12 CCW welcomes the intention to develop indicators for monitoring, but emphasise again that these should also form part of the overall evaluation process.

3.13 Despite the concerns noted above, CCW welcomes the identification of the majority of the sustainability objectives and their sub-objectives as listed in table 3.1. Many of the sub-objectives could be developed into useful and meaningful indicators and targets and should be considered alongside the possible indicators and targets identified in table 10.1. One concern is the lack of a compatibility assessment within this section to ensure that the objectives do not have their own environmental impacts. We would recommend that this be carried out and included in future iterations of this report to illustrate the environmental sustainability of all the objectives.

Table 3.1

- Health Safety and Security – Rather than “open space” recommend reference to Accessible Natural Green Space as defined by the CCW toolkit. In addition to reducing car use by encouraging walking and cycling the sub-objective should indicate how this will be achieved eg by supporting local initiatives such as “safe Routes to School” and infrastructure improvements such as “Home-zones”
- Biodiversity – recommend including “and seeks to enhance connectivity” to the sub-objective on avoiding habitat fragmentation
- The sub-objective relating to historic landscapes should seek to ensure that any significant development is fully assessed using recommended methodology (ie ASIDO/HL 2)
- Air – There should also be a more general sub-objective that sets out the aim of maintaining air quality in the wider context including impacts on habitats and species.
- Land/Soils – a sub-objective specifically relating to preservation of “carbon rich” soil (for example deep peat deposits) should be considered
- Minerals and waste – the first sub-objective should contain a caveat that the winning of all mineral resources will be subject to an appropriate level of assessment where environmental impacts are likely
- Renewable energy – The first sub-objective should also contain a caveat that all major renewable energy developments will be subject to an appropriate level of assessment where environmental impacts (including those on landscape) are likely
- Employment and Wealth Creation – it should be noted that several of these sub-objectives have the potential to have significant negative environmental effects.

4 The Purpose of sustainability appraisal

Article 1 of the SEA Directive (2001/42/EC) states that [the SEA process] is to provide for a high level of environmental protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes with a view to promoting sustainable development”. For the purpose of this SEA/SA, therefore, it must be borne in mind that the principal goal is to “provide for a high level of environmental protection” and not to just ameliorate damaging environmental policies or “deliver more sustainable development”.

CCW understands the SA/SEA process is focussed on the Significant Environmental Impacts of the plan in its widest context and that the Habitats Regulation Assessment is being carried out separately

However the combined SEA/SA must also conform to the Conservation (Natural Habitats & c) (England and Wales) Regulations 2007 (The Habitats Regulations) and both the findings of this assessment and the general duties of the Authority in relation to the Habitats Regulations must be clearly identified in this report.

5 Sustainability Appraisal of the Vision and Objectives

5.2 CCW welcomes the application of the Sustainability Objectives (subject to the concerns identified above) to the LDP objectives. We agree that the amended LDP objectives do cover many of the issues identified in the SEA guidance. However, in the appraisal table (appendix 1) the potential significant environmental effects have not been clearly identified, particularly where "unknown" or "neutral" effects have been recorded. For example, for OBJ1a and b no potential sustainability issues have been identified for landscape or biodiversity, despite both development objectives having the potential to have impacts (both positive and negative) on these factors. Similarly for OBJ1c identifies an "?" against these two factors but the comments section does not clarify what the possible positive and/or negative effects might be. It may be more appropriate to use a "+/-" indicator for this type of assessment rather than a "?".

Another example would be the SA objective for "Energy" which appears to have no relationship with any of the LDP Objectives other than transport and renewable energy generation - it is particularly unclear how reducing traffic congestion and encouraging modal change is likely to contribute to greater sustainability in renewable energy generation while Regeneration Objectives OBJ3a, and particularly OBJ3c, have no relationship with it and OBJ2a (promoting, conserving and enhancing the natural environment) has no potential negative contributions. There are several more similar examples. CCW does welcome the identification of possible adverse impacts in the comments section for some LDP Objectives (such as OBJ2c - renewable energy generation, OBJ3b allocation of land for development) but would question why Objectives with a similar potential for having adverse impacts, such as housing objective OBJ4c, do not. The potential positive contribution that could be made by Objective OBJ2c (mitigating/avoiding flood risk) to biodiversity, in the form new pond and wetland creation etc., has also been missed.

It is possible that considerable additional evaluation work was carried out as part of the production of this table which is a simplification of this complex process. However, as it currently stands, CCW would question its usefulness in the appraisal process and would strongly recommend any additional work is included, or further clarification of the assessments carried out presented.

5.2 Given the comments above, the list of issues raised in this section appears somewhat restricted.

6 SA of the Growth Options

We note that the appraisal of the various growth options contained within this report is a summary of other sustainability appraisals carried out in the summer of 2007. While it is not necessary for us to be consulted on every aspect of the SEA process it is difficult to fully appreciate the context of these summaries without seeing how the SA objectives have been applied.

We note that there appear to be additional SA appraisals contained within the main Pre-deposit LDP document and we would welcome clarification as to whether these are to be considered part of this Sustainability Appraisal.

Similarly, it is not necessarily incorrect to simplify the assessment process to evaluate growth "themes" rather than assess every element of the LDP option individually or selectively apply the most relevant SA Objective to the option in question. However, it is necessary for the SA/SEA process to show how the "significant environmental effects" of the options have been evaluated and it is not clear in the current report how this has been done. We would emphasise that this does not mean that CCW disagree with the findings of the SEA report, more that it is difficult to assess the basis for which these recommendations are being made or that they have fully considered all the relevant environmental issues.

6.4 - 6.8 We appreciate that it is not straightforward to evaluate the potential impacts of a general growth option but it is important to consider all the potential significant environmental impacts before making recommendations. For example, the potential negative impacts on biodiversity, landscape, soil and mineral provision are listed in relation to development on green field land but there are also impacts to water quality, flood risk (even if not on the flood plain it may lead to reduction in infiltration rates and synergistic effects further down the catchment), access to green space etc. Many of these could be mitigated for by inclusion of suitable policies or approaches and some may also have significant positive environmental potential. However, without a clear methodology for how this has been assessed it is difficult to ascertain if this is the case.

6.11 - 6.13 We note that the LDP proposes adopting the medium growth model and this is assessed as acceptable in the SA despite an annual allocation for new homes being greater than that recommended by South East Wales Strategic Planning Group (540 pa rather than 462 pa). We agree that the implications of adopting this level of growth will depend on a number of factors, such as where, how and when the proposed growth is implemented but it is one of the functions of the SEA to attempt to evaluate what the significant environmental effects of this might be. Further evaluation and refinement of the assessment can take place when this extra detail is available, however, by that stage it is highly likely that the direction of the preferred strategy will have already been set.

6.14 - 6.21 CCW does not disagree with the majority of the statements in this section relating to the likely sustainability effects of the three employment growth options. However, the comments made above in relation to the housing options are also applicable here. We note the rationale used for not carrying out a more detailed appraisal, set out in appendix 3, but feel that this does not address the requirements of the SEA to assess the significant environmental impacts of the proposals. We understand that to make too many assumptions based on lack of data could result in misleading outputs, but it is also true that unless some basic assumptions are made then there is a risk that the whole assessment might become subjective. In this instance, the four assumptions made in the appraisal do not include any environmental elements, despite all three options being likely to have a number of positive and negative environmental effects regardless of how they are implemented. To comply with the requirements of the SEA Regulations we would normally expect to see an analysis of how each of these growth options has been assessed (for example, against the SA objectives) to predict their potential impact on the environment.

We would also expect to see some form of justification and mitigation measures, with suitable caveats to cover the inherent uncertainties, where potential significant effects have been identified. We note that some of the questions raised in this section are clarified in later sections of the SA in relation to specific strategy elements and policies and the proposed mitigation for them. It may be possible to cross reference back to this section to help clarify the assessments made on the three growth options. We look forward to further consideration of this in future iterations of this document.

7 SA of Spatial Strategy Options

The SEA Regulations require an assessment of alternatives as part of the evaluation process. We note that in section 7.4, the evaluation of the three strategic options were carried out by the plan preparation team using the LDP objectives and this is not included in the SA report. WAG guidance on preparing LDPs clearly states "Throughout the pre-deposit participation stage (LDP Regulation 14), authorities must undertake sustainability appraisal of the strategic options and work with the environmental consultation bodies (under the SEA Regulations) and stakeholders on an initial sustainability appraisal report. This will inform the decision making process and identification and development of the preferred strategy."

We welcome that the SA does include an assessment of the strategic options using the SA objectives. However, as identified in the report itself (7.5), the separation of this process has led to a number of assumptions having to be made which may compromise the assessment to some degree. Whereas most of these may be reasonable, the assumption that "policies will be in place to mitigate against adverse impacts on the natural environment" is not compatible with the aim of assessing the respective significant environmental effects of the three options. It should be part of the role of this assessment to identify what form such policies might take and what they will need to consider with respect to each of the proposed options. In addition, the assumption that uncommitted allocations can be reviewed requires further clarification, as CCW considers that existing allocations within current local plans that do not have planning permission should not simply be rolled forward, but should be reviewed through the SEA process to ensure that they are sustainable.

7.6 CCW recognise that the SA/SEA process will develop as additional information on various elements, such as allocations or policy detail, becomes available. However, many of the wider environmental impacts can be assessed, with suitable caveats, even at this stage and it is important to consider these as part of the assessment. This is particularly important when considering potential significant environmental effects that the options may have on biodiversity and the natural environment, air quality, landscape etc. and what strategic policy options may be available and/or required to enhance or mitigate these effects.

7.8 Summary of impacts:

- Accessibility and air quality. We welcome the recognition of the importance of modal transport change as a key factor in assessing the three options' impacts on air quality.
- The environmental impact of new housing has been assessed separately under the low, medium and high housing growth options. This should be cross referenced to this section as it may be that high housing growth in one area may be environmentally acceptable where as medium or even low growth in other areas might have significant environmental implications. Recommendations such as this should then steer the plan authors.

- Using previously developed land in preference to greenfield land, landscape soil and biodiversity impacts: While we appreciate that the detailed impacts of the three strategies will depend on the location of development sites, it would have been useful to have some assessment of the relative merits of the three options against generic impacts. CCW welcomes the clear identification of the importance of the four European and international sites and recommend incorporation of the findings of the HRA in this section where appropriate. Where such information is not yet available, a suitably precautionary approach should be applied with a clear indication of risks and concerns for those elements of the three strategies that indicate potential development that may affect these sites. As further information comes forward, CCW look forward to working with Bridgend CBC to ensure these elements are fully considered and incorporated into the SA/SEA process.

7.9 While CCW appreciate that it can sometimes appear “artificial” to recommend a particular strategy as the most sustainable option, it is important to identify where an option performs well or poorly against the indicators. This allows specific policies to be developed/amended, allocations influenced and guidance produced to influence the nature of the preferred strategy and the plan itself to account for strengths and weaknesses brought out in the assessment. This has been done to some extent within the assessment tables in appendix 4 but it would be useful to have this summarised within this section.

8 Sustainability appraisal of the strategy

8.6 Porthcawl – CCW welcomes the identification of the environmental risks associated with this regeneration growth area, particularly the tidal flooding (links to the developing Shoreline Management Plan and Flood Risk Management Strategy) the possible loss of green space and the clear identification of Kenfig and Merthyr Mawr as possible constraints. The possible impacts on the Kenfig SAC will need to be fully considered in the HRA. The potential for impacts on the Merthyr Mawr, Kenfig & Margam Burnows Historic Landscape should also be considered.

8.7 Maesteg and Llynfi Valley – There may be positive environmental potential for elements of this growth area relating to improving access to natural green space and enhancing ecological connectivity as well as possible negative impacts on landscape and Historic landscapes.

8.9 Bridgend – CCW acknowledges the recognition of potential environmental risks as a result of the likely green field land take for this growth area. This will require suitable mitigation policies to ensure potential adverse effects are minimised and positive elements enhanced.

8.10 Strategic employment sites – CCW acknowledges the recognition of potential environmental risks as a result of the likely green field land take for the 4 strategic employment sites. This will require suitable mitigation policies to ensure potential adverse effects are minimised and positive elements enhanced. Given their location in the M4 corridor they should also take account of the Networked Environmental Region work being developed as part of the South East Wales Spatial Plan.

8.13 & 8.14 CCW strongly supports the recommendation to clarify the status of various allocation commitments being considered in the plan.

The inclusion of a table setting this out would be both informative, in terms of assessing residual distribution, and also give confidence that all relevant allocations are being fully considered by the assessment and not just "rolled forward" from previous plans.

8.15 CCW supports the recommendation that employment allocations need to be reviewed and then assessed as part of the SA/SEA process prior to final selection of strategic sites. In addition to the reasons listed this would also allow for further consideration of potential significant environmental effects for the various sites and recommendations being made to minimise adverse effects.

SA of the strategic policies

CCW notes the concerns raised by the SA that some of the 15 policies proposed in the pre-deposit LDP may not contain sufficient detail to implement the strategy. We support the recommendations (subject to comments below) made by the SA/SEA report and look forward to seeing how the future iterations of the LDP take full account of them.

8.23 The assessment of policies for rural areas need to take full account of the key role rural settlements play in both general landscape and how increased integration into urban areas/ increased urbanisation itself can have significant environmental effects (for example loss of habitat connectivity, pressure rural resources, loss of access to natural green space).

8.24 & 8.25 CCW strongly supports the recommendations made in these sections in relation to energy efficiency, sustainable homes, renewable energy generation but would also add access to natural green space, sustainable drainage etc. We also support the need for clear and unambiguous policy wording.

8.27 Assessment tables - It would have aided use of these table if the classification of results had included a separate "+/-" category in addition to the "?". In some cases a "+" or "-" has been used and often the description itself highlights key negative or positive elements within the assessment. However, to aid interpretation a distinction between truly uncertain assessments and those where there were a number of conflicting positive and negative effects should be made.

8.43 To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere - CCW notes with some concern that while a number of negative elements have been identified with specific reference to policy SP 6 and SP7 within the assessment tables, there is no overall assessment of the impacts of coal extractions and use on global green-house gas emissions. While we appreciate and support the focus of the SA on addressing local adaptation measures to climate change, the wider impact of policies should not be ignored. Given that the LDP objective reflects this in it's wording (atmospheric integrity) we would also expect to see this reflected within the SA when assessing these policies.

9 Mitigation of Impacts

CCW notes and supports the recommendations for mitigation contained in this section. In addition to these general mitigation measures, we would also strongly recommend that the LDP take full account of the recommendations and assessments contained within the assessment tables themselves (appendix 5). We look forward to future iterations of this SA report setting out how these recommendations have been dealt with by the Plan authors.

10 Monitoring

CCW supports the approach suggested for developing a monitoring framework for the SA/SEA and the LDP. We would recommend the development of a suite of indicators and targets based on the key likely significant environmental effects of the plan, as identified in this assessment, but acknowledge that this will be limited by the lack of defined indicators at this stage. We look forward to commenting on these indicators as they are developed in further iterations of this assessment.

11 Conclusions and recommendations

11.3 It should be noted that while potential negative environmental impacts are inevitable in the production of an LDP it is the function of the SA/SEA process to help identify, quantify and, where possible, avoid or mitigate for them. The current SA goes a long way towards achieving this, subject to a number of assumptions and procedural issues covered above, and this should be emphasised within this section, as should the need for the LDP to take account of these recommendations.

11.4 It is an important role of the SA/SEA process to determine whether the levels of growth proposed by the preferred strategy are fundamentally sustainable or not and what alternative strategies might offer. Even if a "high-growth" option is selected, the LDP can still show how it is avoiding/limiting any negative effects by taking on more sustainable elements from these other options or how these negative elements are being addressed in response to the assessment of specific policies and objectives. This needs to be clearly set out in the SA/SEA and the plan itself needs to show how this has been taken on board.

11.6 CCW welcomes the recognition of the need to address environmental issues as part of the continuing plan development, particularly the need to assess potential impacts on European and international sites.

11.9 See comments on section 9, CCW will be expecting to see how the recommendations of the SA process, plus the points that we raise in response to this consultation, are reflected in the future iterations of Bridgend LDP.

Countryside Council for Wales

Habitats Regulations Assessment

Other Natura 2000 sites and Ramsar sites in 15km of County Borough Boundary

A new HRA appendix will be prepared to take into demonstrate the reasons why only these four sites were considered in detail – and others eliminated from further investigation. The main reasons for this are mainly due to distance – making impacts unlikely or very difficult to attribute to development in Bridgend. For example, sites such as Cwn Cadlan SAC, Coed Nedd a Mellte SAC and Blaen Cynan SAC are most likely to be adversely affected by direct disturbance or possible water table changes – but development in Bridgend is ‘downstream’ of these are therefore unlikely to be an impact. Sites such as such as Crymlyn Bog SAC/Ramsar is quite distant from Bridgend and the impact of development in Port Talbot will be a much greater influence, that that of Bridgend.

There is the possibility that increased traffic from Bridgend County Borough on the M4 and A4054 could have air quality impacts on the Cardiff Beech Woods SAC. However, given the numerous other developments in south Wales, demonstrating impacts of development in Bridgend is not possible, and therefore screened out.

The appendix will be less detailed than the site form for other Natura 2000 sites (and Ramsar), simply setting out their reasons for designation, vulnerabilities and reasons for being screened out of the HRA.

Correction for Kenfig SAC

We note the need to differentiate between priority features and primary reasons for designation, and the need to clarify that management of the dunes is as important as sediment supply. Changes will be made in a revised HRA.

Re-screening

Detailed policy screening will be necessary as the LDP develops. However, we will screen out impact on sites outside the County Borough – including Dunraven Bay SAC.

In-combination impacts

It is agreed that it is important for the HRA to pick-up in-combination impacts. However, this process needs to be kept manageable. Impacts in particular that continuing with the HRA of LDP will need to consider are with waste and minerals planning (part of the LDP), transport plans (also likely to be part of the LDP) and water resource planning.

Sustainability appraisal

Meeting the requirements of the SEA Directive/Regulations

In the SA/SEA of the Deposit SA/SEA a table will be included demonstrating how the regulatory requirements of the SEA process have been met.

Schedules of consultation

SA reports will include a schedule of consultation. A summary of changes following scoping consultation were included as an appendix for the final scoping report.

SA of the Vision and Objectives

Following the comments of CCW the appraisal of the objectives has been reviewed. The revised appendix is included as an attachment. The CCW comments remark that additional work may have gone into the appraisal of LDP objectives that has not been shown, this is not the case. These are objectives for the Plan and do not set policy – therefore, their only real significance in moving towards sustainable development is whether they are fully carried through into LDP policies and proposals. More detailed appraisal is also difficult given that these are objectives and it is not always clear what implementing them will mean for development. Therefore, we feel the level of detail in the appraisal of objectives is appropriate for the task, and do not propose to look at these in any further detail. However, if a revised set is prepared for the LDP Deposit the SA will need updating.

SA of Growth Options

CCW note that they were not consulted on the appraisal of growth options. This was due to the timetable of LDP preparation and it was the Council's decision on how consultation was undertaken at that stage.

The CCW is welcome to comment on the SA of the growth options (and the options themselves).

Comments on 6.3-6.8: It is agreed the SA should refer to the significant environmental effects of the various options. However, this could not be very precise given the very different ways the options could be implemented. As CCW identifies this section does not include mitigation suggestions. It may be possible to include these here, however, mitigation of impacts is included in the policy appraisal. We believe that this level of detail is most suitable here, and would hope the Council takes these suggestions into account in moving forward with the LDP.

Comments on 6.11 – 6.13: CCW notes that there should be appraisal of the implication of the preferred growth option. This is not included in this section of the SA but is part of the appraisal of strategic option in Appendix 4 and the appraisal of policies.

Comments on 6.14-6.21: CCW note that more detailed appraisal should be carried out of the employment options. The difficulty with additional appraisal was the detailed review of sites had not been completed at the time of the SA of options, therefore the SA was based on limited evidence. The SA identifies that this may be a problem in defining a sustainable strategy for the LDP, as is the level of existing commitments.

We agree with the CCW comments of the SA/SEA being an iterative process with plan making. Therefore, would recommend the Council make sure they put in place the mechanisms for this SA to influence plan making during any continued evolution of strategy, preparation of policy and choice of allocation.

The CCW comment that certain elements of the assessment seem to have been carried out separately to the SA/SEA. It is not clear what is meant by this comment, it is true that options appraisal was undertaken prior to this first formal reporting stage. However, this was to fit with the LDP preparation process and the appraisal of options is necessary to meet the SEA Regulations. Options appraisal was part of the internal iteration of SA and LDP preparation.

Existing commitments

The SA agrees with CCW comments of the difficulties of existing commitments, meaning that some impacts of development are inevitable. The sustainability impacts of existing commitments will need to be a consideration of moving forward with the LDP to Deposit.

Comments contained Annex 1 of CCW response (and not covered above)

Change log: A 'change log' of how the SA comments and recommendations could help demonstrate how the SA has been used in plan making. This would need to be prepared by plan makers.

Comment on 3.1: It is not clear how the sustainability objectives do not meet the legal requirements. All of the matters listed in Schedule 2 of the SEA Regulations (Wales): biodiversity (including flora and fauna), population, human health, soil [land], water, air (climatic factors), material assets [energy, minerals], cultural heritage including architectural and archaeological heritage [built environment] and landscape.

Comment on 3.2 – 3.3: The SA specifically chose to limit the consideration of 'other plans and programmes' to those with specific relevance to the SA and LDP. This is to avoid long lists of policies and programmes that add little to the SA process. Therefore, this does not include many international and national legislative requirements, nor lists of national strategies where relationships with planning in Bridgend are very limited.

Comment 3.11/3.12: This point is noted – suggested indicators will be incorporated into monitoring proposals for the next stage of SA.

The sustainability framework will be updated for the next stage of the SA, this is likely to be reworking of the 'supporting objectives' to 'decision making criteria'. This will give the desired direction of change for each objective that would represent a movement towards more sustainable development and therefore be more self-explanatory for the sustainability appraisal.

Comment 3.13: Consideration of compatibility will be included in moving forward with the SA.

Comment on table 3.1: The update of the sustainability objectives will include some additional material suggested by CCW. This includes greater emphasis on natural open space, enhancing habitat connectivity, new sub objective on air quality,

Those where we may not make a change in response to CCW comments: identifying the need for significant development to have suitable historic landscape assessment (although this point is noted and will be considered in relation to the SA of any policy relating to historic landscape), assessment of environmental impacts of minerals proposals are covered through other objectives.

Comments on section 4: The purpose of SEA is noted, additional wording will be incorporated in this section in moving forward with the SA of the LDP.

Comment on section 7: The SA consultants also undertook an SA of the spatial options (shown in Appendix 4), this covered similar matters to the Council's own appraisal but from an independent viewpoint. We would be reluctant to include the Council's SA in the SA report – as the LDP preparation and SA are intended to be independent (yet inform each other). It is the view of the SA that the findings in the SA report (Appendix 4) should be taken into account by the LDP team. The process for consulting on options was determined by the Council.

Details of mitigation policies are given in Appendix 5 and section 9. For the appraisal of the options an assumption has to be made that they would be delivered according to mitigation policies, eg protecting and enhancing biodiversity, historic heritage, avoiding pollution impacts etc. without this the appraisal would be too difficult to manage and identify the most noteworthy differences in delivering sustainable development between alternatives.

The need for as full as possible review of commitments is raised by the SA as a significant factor in delivering a sustainable spatial strategy, and one that is noted might be a limitation of any strategy pursued.

Comment on 7.8:

Accessibility and air quality: This comment is noted. The appraisal of options is based on different distribution of development around the County Borough (where this information is available), and therefore reflects the relative impacts of high growth in one area vs low growth in another.

Using previously developed land: Information on the quantity of greenfield land required is very difficult to establish from the information available at the time of the appraisal. Appendix 4 does include some details of the relative impacts of each option.

Comment on 7.9: Noted.

Comment on 8.6: Noted – comments will be incorporated where suitable in moving forward with the SA.

Comment on 8.7: Noted – comments will be incorporated where suitable in moving forward with the SA.

Comment on 8.9: Noted – comments will be incorporated where suitable in moving forward with the SA.

Comment on 8.10: Noted – comments will be incorporated where suitable in moving forward with the SA – particularly in relation to Networked Environmental Region work.

Comment on 8.13 and 8.14: The SA agrees that more detail needs to be presented on commitments. This should be part of the LDP or as a publicly available evidence base for the LDP. The SA could therefore comment on the suitability of these sites and their review.

Comment on 8.15: Noted – agreed.

Comments on SA of policies

Agree with CCW that policies may need to be clarified and improved to implement sustainable development.

Comment on 8.23: Noted – comments will be incorporated where suitable in moving forward with the SA.

Comment on 8.24/25: Noted

Comment on 8.27: A ‘•/x’ etc symbol will be used in future to indicate where impacts can be both positive and negative – rather than a ‘?’.

Comment on 8.43: This point is noted. However, it is difficult for the SA to say if constraining the supply of coal would also constrain demand. If demand is not managed then environmental effects of importing coal from other countries may be higher – especially where there a less rigorous safeguards and controls on operation and management.

Comment on 9 and 10: Noted.

Comment on 11.4: This point is noted.

Comments from the Countryside Council for Wales

Sustainability Appraisal (SA) and Strategic Environmental Assessment (SEA)

EAW have not been consulted on the production of the SEA document. We hold background data on a number of environmental issues within Bridgend County Borough which has been offered to the Local Authority's consultants. The scope of this information was previously agreed with your Officers.

To date we have not been contacted by your consultants and as such we have concerns over the accuracy of the SA and SEA documents. We would highly recommend a session between EAW, yourselves and your consultants to go through the issues. Subsequently, we will be able to provide you with written observations on this aspect of the plan. Attached is a copy of the EAW's Local Evidence Pack for Bridgend, which as stated above, should be used to inform the SEA.

Habitat Regulations Assessment (HRA)

The HRA concludes that there is a potential negative impact upon Kenfig, Crymlyn Bog, Cefn Cribwr Grasslands and Blackmill Woodlands and that further assessment is needed. EAW would support this conclusion and have some comments on the potential scope of further assessments and issues to be looked at.

Potential development areas along side SAC sites as highlighted within the HRA will have consequences upon water quantity, water quality and air quality. EAW has a permitting/consenting role in all these areas. Additional consents may cause strain upon the resources available and may have a knock on impact upon the SAC sites, either alone or in combination impact.

Potential water abstractions and discharge requests arising from any development could impact upon the SACs, as stated in the HRA. Any additional consents should be subject to individual HRAs or CRoW assessments where appropriate. The Environment Agency and Welsh Water should be consulted under the Review of Consents for each individual SAC site. At present the reviews for Kenfig, Crymlyn, Blackmill Woodlands and Dunraven Bay are currently available on request from EAW.

Most of the SACs are currently at risk or are impacted from poor air quality (acid and nutrient deposition). Increases in development, industry and traffic within areas close to SACs would further contribute to acid and nutrient deposition with critical loads being further exceeded. Air Quality Assessments have been completed for SAC sites and are available as part of the site reviews. This is also a concern of CCW and they will make additional comments on this matter.

Your Authority should be made aware that the Environment Agency's Corporate Strategy is currently under review. The strategy will highlight our key areas of work over the next five years (2010-2015) and will give you some background as to why we have raised certain issues/topics. It may be prudent to include this within the 'Other Plans and Strategies' section.

This letter sets out our main areas of concern, if you have any queries please do not hesitate to contact me.

In addition to our above comments, we have experienced problems with accessing information/documents from your website. If this is an ongoing problem, we would be grateful if any consultation documents can be sent by CD or hard copy in the future.

Yours sincerely



Miss Bonnie Miles
Planning Liaison Officer

Direct dial 01792 325632

Direct e-mail Bonnie.Miles@environment-agency.gov.uk

Environment Agency Wales

The comments from the Environment Agency Wales (EAW) on the SA primarily relate to the use of their data in the appraisal process. This is noted and this additional material will provide an essential information source in moving forward with LDP preparation and to support the SA. The SA will continue to seek inclusion of policies in the LDP relating to the protection of water quality and resources, as well as other issues such as avoiding air pollution.

For the HRA the comments relate to the role of EAW in granting permissions and consents. The role of the EAW is noted and one that the LDP preparation team must take into account in developing proposals for the plan area.

Comments on the Habitats Regulations Assessment (screening)

Comment: The EA support the finding there may be impacts on the Natura 2000 sites.

Response: Noted

Comment: Where a protected site could be affected by water quantity/quality or air quality EA could a permitted/consenting role. Additional consents may cause a strain on the resource.

Response: Noted

Comment: Potential water abstraction and discharge requests from development could impact on the SACs, as stated in the HRA. These will be subject to individual HRA or CRoW assessment where appropriate. The EA and Welsh Water should be consulted under the Review of Consents for each individual SAC site. Reviews for Kenfig, Crymlyn, Blackmill Woodlands and Dunraven Bay are available on request from EA.

Response: This is noted. If necessary these Reviews of Consent could inform the SA and the EA should make these available to the LDP team.

Comment: Most of the SACs are currently at risk or are effected by poor air quality. Increase in industry and traffic in the areas near the SACs could lead to further contribution to air quality impacts. Air Quality Assessment are completed for these sites.

Response: The HRA includes detail of air quality risks on sites. It will continue to urge the LDP preparation team to consider the air quality impacts on vulnerable sites.

Comments on the Sustainability Appraisal

Comment: The Environment Agency Wales hold information on the environmental issues in Bridgend County Borough.

Response: SA team have received the information and will ensure it is referred to in moving forward with the SA.

Comment: Concerns over the accuracy of the data used in the SA.

Response: The data has been reviewed and although there are gaps in the data used for the sustainability appraisal there are no conflicts. The SA will seek to ensure that the flooding and water quality issues are properly covered in the LDP during all stages of preparation.

Comments from other individuals / organisations

Comments on the Sustainability Appraisal

Comments on the SA primarily relate to detailed matters on the content of the SA. Other comments, although written as a response to the SA, are matters for the LDP team to take into account in moving forward with the plan and developing policies. These comments will provide a useful source of information in moving forward with subsequent stages of the SA.

Comment: The SA has a bias in favour of wind power.

Response: The LDP does not include detailed policies yet and therefore there has been no opportunity to appraisal specific renewable energy options or site allocation. The SA is in support of lower carbon energy, but this could be from a variety of source, including small scale generation associated with individual buildings or groups of buildings. This could include wind energy as an option, but also solar power, ground source heat pumps and alternative fuels.

Comment: Agree with the SA that appropriate waste water treatment infrastructure will have to be in place to avoid impacts on water quality from new development.

Response: Noted.

Comment: No mention of sustainable drainage systems to reduce flood risk.

Response: The SA Infrastructure policy SP15 (in Appendix 5) identifies the need for the policy to refer to sustainable drainage systems to reduce flooding.

Comment: No mention of the Water Framework Directive.

Response: The SA does refer to the need to protect the water environment as one of the overarching objectives for the SA. This will include complying with the water framework directive.

Comment: We see no need to maintain coal stocks. It is hypocritical to talk about sustainability if future opencast is allowed, as opencast can never be sustainable it is only profitable to private open cast companies, is damaging to health and wellbeing and the environment, provides little employment or wealth to the localities that are directly affected by the development.

Response: This point is noted. However, it is difficult for the SA to say if constraining the supply of coal would also constrain demand. If demand is not managed then environmental effects of importing coal from other countries may be higher – especially where there a less rigorous safeguards and controls on operation and management. The SA will endeavour to ensure that policies are in place to reduce the impacts of coal extraction on local communities and the environment, through planning conditions and controls. As well as policies to help reduce energy demand in the County Borough. National policy requires coal resources are safeguarded from sterilisation, but this policy does not presuppose their extraction.

Comment: Air pollution from industry such as opencast should also be reduced and recognised as having huge impacts on local communities and their health and wellbeing.

Response: More detailed stages of appraisal will seek to ensure the LDP contains policies on protecting local communities from adverse air pollution impacts and hazard.

Comment: When an area is rich in biodiversity and habitats but not protected we would hope Bridgend can recognise the importance and value of such an area to local communities.

Response: The SA will seek to ensure the LDP contains policies to value biodiversity wherever it is found and that all new development sites should seek to incorporate biodiversity enhancement measures.

Comment: Any development on greenfield sites should be disallowed.

Response: Previously used land is a priority for development. However, greenfield sites will be needed to support the demand for new homes in Bridgend, including from the existing resident population.

Comment: Concern of the potential contamination of the lower Ogmore River due to run-off, we endorse that this requires continuous monitoring.

Response: The SA will include water quality targets as part of the monitoring framework. Water quality will continue to be monitored by the Environment Agency.

Comment: Agree with the findings of the SA that over-allocation of employment land may lead to development in less sustainable locations and could mean that greenfield land allocations are taken up in preference to previously developed or town centre sites. Fewer sites should be allocated for employment.

Response: Noted.

Comments on the SA of greater relevance to LDP preparation: no greenfield development, no opencast mines, sustainable drainage systems, serious concerns about the erosion of the coast line due to dredging, extensive flooding (with greater frequency) on the fields south of the A48,

Other comments: promote Green Gyms to protect the environment, give higher importance to agricultural land and farmers should diversify

Comments on the Habitats Regulations Assessment Screening

The majority of comments on the HRA relate to detailed matters. Comments on the HRA also need to be taken into account by the LDP team in moving forward with plan preparation.

Comment: The HRA fails to address the wind energy development proposed by WAG.

Response: This HRA cannot address national policy, including the strategic search area for wind energy. However, it may be suitable for the HRA to consider 'in-combination' effects on the internationally designated nature conservation site in proximity to the search area.

Comment: HRA maps are illegible.

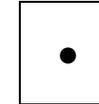
Response: To keep file sizes down the site maps have to be quite low quality, although these clearly show the site boundaries. The buffer zones show the areas of key settlements as labels on the maps – and therefore should be legible.

Comments on the HRA of greater relevance to plan making: The LDP needs to secure the prevention of any further development in the countryside near the Merthyr Mawr Warren. This will ensure that the LDP protects the integrity of the Merthyr Mawr Warren and does not provide the opportunity for additional detrimental impacts which may alter an otherwise acceptable screening conclusion for this SAC.

Appendix 1
Sustainability appraisal of the Local Development Plan Objectives

Key to appraisal symbols

The LDP objective is compatible with the sustainability objective and likely to contribute to the achievement of greater sustainability



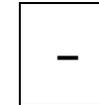
The LDP objective is likely to detract from the achievement of greater sustainability according to the identified sustainability objective



The LDP objective does have a relationship with the sustainability objective, but the exact nature of this is complex or unpredictable, or multiple impacts potentially both positive and negative



No identifiable relationship between the topic covered in the policy and the sustainability concern



	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
PLACES																
OJ1a Bridgend as a regional hub	●	?	-	?	?	?	?	●	-	-	?	-	-	●	●	This objective should help to increase accessibility to new jobs, homes and services by providing a central focus for these developments. However, without maintenance and enhancement of travel choices, there could be adverse impacts on accessibility of these developments for residents of those settlements in the County Borough with poor access to Bridgend town. This objective may require the expansion of the town onto peripheral green land, with the risk of adverse impacts on biodiversity and landscape.

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
OB1b Revitalise Maesteg	?	?	?	●	?	?	●	?	-	-	?	-	-	●	?	Delivering new development in Maesteg is essential in revitalising the role of the second largest town in the County Borough. It needs to be the focus of a large proportion of new development to reinforce its role as the main service centre for the Llynfi Valley. This obligation should help provide accessible jobs and services for the existing and future residents of the area. It will be necessary to ensure the allocation of land for new development can demonstrate deliverability and is meeting the needs of developer. This is essential in order to secure the necessary regeneration of the area. This objective may require the expansion of the town onto peripheral green land, with the risk of adverse impacts on biodiversity and landscape.
OB1c Porthcawl premier seaside resort	?	?	-	?	?/X	?/X	●	?	?	-	●	-	-	●	●	Focus on Porthcawl as a tourism destination should help improve local wealth creation, although it will be important to ensure this includes the creation of high quality jobs and higher spend visits. Development should also proceed in a way that does not harm the biodiversity assets, including local internationally protected sites, nor the high quality landscape character, although there is the risk of harm in this sensitive location. Regeneration of the waterfront should help provide new homes, make efficient use land and improve the built environment character; development will have to

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																take into account risks of tidal inundation. The LDF should identify new employment sites.
OB1d Realise potential of the Valley Gateway	●	-	-	?	?	?	-	?	?	-	?	-	-	●	●	There is potential for the Valley Gateway to be a focus of development that has good access by public transport. Development in this location will need to reduce impact of additional transport on from development on the M4 corridor. At least part of the site identified for development in this area are currently used for community use, including playing fields, should be retained for this community use. This area is also important to the current economy of the County Borough and identifying additional employment land may be necessary.
OB1e Reduce traffic growth etc.	?	-	●	●	●	-	●	●	●	-	-	-	-	?	?	If successfully implemented this objective should help meet several sustainability objectives. Central to achieving this, is for the LDP policy and proposals, to help support a variety of travel choices and promote development that reduces the overall need for travel. Aiming to reduce air pollution from transport can have benefits for human health and sensitive natural habitats.
OB1f Integrated transport solutions	?	-	●	●	●	-	●	●	●	-	-	-	-	?	●	This objective is closely linked with OB1e. Achieving integrated transport can have a variety of benefits including reducing the number and length of car journeys, helping to promote equitable access, and reducing congestion and resultant impacts on environmental quality. Aiming to reduce air pollution from transport can

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																have benefits for human health and sensitive natural habitats.
ENVIRONMENT																
OB2a Natural and built environment	-	-	?	?	●	●	●	●	?	●	?	?	-	-	●	There is a clear positive relationship between this objective and sustainable development. However, in some instances it may conflict with meeting other objectives relating to growth and change. Preserving the quality of the natural environment also helps in protecting a vital economic asset to the region, attracting visitors and investment to the County Borough.
OB2b Tackle poor air and water quality	?	-	●	-	●	-	?	●	?	●	-	-	-	-	?	This is a positive objective for the LDP, although as with OB2a it may not be entirely in the control of the plan. Achieving this objective will also require road traffic to be reduced to help improve local air quality. Aiming to reduce air pollution from transport can have benefits for human health and sensitive natural habitats.
OB2c Manage risk and fear of flood	-	-	●	?	?	?	-	-	●	?	-	-	-	-	?	Avoiding the risk of flood through careful siting and design of development is essential in achieving safe, healthy development. Recognising the importance of reducing the fear of flood is also positive in helping to protect residents' mental wellbeing, as well as their physically wellbeing during flood events. There is the potential for this objective to have benefits for the landscape and biodiversity, through the

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																creation of new water features, such as ponds and swales that can provide valuable habitats and attractive features in the landscape.
OB2d Mineral resources and waste	-	-	-	-	?	?	-	-	?	-	?	●	-	-	?	There may be some potential conflicts of meeting objectives to safeguard minerals and those of relating to growth. The LDF must identify ways of implementing sustainable waste management, including through appropriate site allocations for new waste managements facilities.
OB2e Contribute to energy needs	-	-	-	-	?/ X	?/ X	?	?	●	-	-	●	●	-	?	Meeting energy needs through provision of renewable energy should bring a variety of benefits in achieving sustainable development, related to air quality, climate change, energy use and minerals. Depending on the type and scale of renewable energy development there may be some adverse impacts on the local environment, to be weighed against global benefits. There is also the risk of impacts on biodiversity.
REGENERATION																
OBJ3a Diverse economy	?	-	-	?	-	-	-	-	-	-	-	-	-	●	●	These objectives should improve the resilience to economic changes, and provide a range of jobs to meet various needs of the resident workforce.
OBJ3b Realistic level and variety of employment land	?	?	-	-	?	?	?	-	-	-	?	-	-	●	●	Providing the land necessary to meet the diverse needs of the economy could help improve economic investment and endemic business growth in the County Borough. However, achieving the mix and quantity required by the market does risk environmental impacts, such as

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																loss of greenfield land (with landscape and biodiversity impacts). It also potentially puts employment in locations that may have good access to the national road network, but less good access to employment sites for the resident workforce of the County Borough. De-allocated, or re-allocating employment land for alternative uses may help make the best use of land. Therefore, the LDP policy should consider the benefits and impacts of identifying additional sites, or re-allocating employment land.
OBJ3c Regeneration of Valley Communities	•	-	-	•	?	?	-	?	-	-	?	-	-	•	•	The valley communities, for the most part, share characteristics related to their coal mining history. In all there are issues related to access to employment and local services, and have areas of high deprivation. Some are also constrained in terms of land suitable for growth. New development to aid regeneration should be focused in these areas – tailored to meet the needs of local residents, whilst maintaining and enhancing transport links (affordable) with major service centres.
OBJ3d Encourage tourism	-	-	-	?	?	•	•	?	?	-	-	-	-	•	•	This objective recognises the importance of high quality places in attracting investment and visitors to the area. This should aid in wealth creation, as well as helping to protect environmental assets. However, increasing visitor pressure in some locations could have adverse impacts on biodiversity.

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
OBJ3e Bridgend centre as a retail destination	?	-	-	-	-	-	•	?	-	-	-	-	-	?	•	Bridgend town centre has the potential to provide a better retail offer. This could help reduce peoples' need to travel to other shopping centres, potentially reducing number and length of car trips.
OBJ3f Support viable town and district centres	•	-	-	•	-	-	-	?	-	-	-	-	-	?	?	It is essential that the villages of the County Borough each retain a community focus in the town centres. The LDP should include policies and proposals that support existing services in these location, and allocations that encourage new provision.
COMMUNITIES																
OBJ4a Meet needs of deprived communities	?	?	?	?	-	-	-	-	-	-	-	-	-	?	-	This objective covers similar issues to OBK3c, although with more of a social emphasis. It is hoped that this objective could achieve a variety of benefits for the deprived local communities, including provision of affordable homes, strengthening of existing communities, and improving health and wellbeing. Achieving these outcomes will depend, to some extent, on the implementation of other plans and strategies to address these issues.
OBJ4b Equality of access to services	•	-	•	•	-	-	-	-	-	-	-	-	-	?	-	Achieving this objective is essential in order to deliver the social progress objectives of sustainable development, as equity is central to this concept. Providing accessible services can have benefits now and in the future to the residents of the County Borough, with benefits in

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																terms of education, access to work and healthcare.
OBJ4c Deliver housing to meet need	?	●	●	●	?	?	-	-	-	-	-	-	-	-	?	The delivery of housing is a principle goal of the LDP. Part of this provision will be delivering homes to meet the needs of all residents. Therefore, it will be necessary to provide good quality affordable homes in all parts of the County Borough, with particular emphasis on delivering new homes where this type of provision is currently lacking. Providing homes for all can have a variety of benefits in terms of achieving sustainable development, including health and wellbeing, community development and a providing for a resident workforce. New homes are likely to require new greenfield sites for development, with the potential for adverse landscape or biodiversity impacts.
OBJ4d Provide community facilities	●	-	●	?	-	?	?	-	-	-	-	-	-	-	-	Background information shows that there are areas of the County Borough currently underprovided for in terms of playfields and children's play space. These deficits need to be resolved, with new quality spaces provided where necessary through the LDP, with policies in place to ensure the long-term upkeep of these areas.
OBJ4e Protect smaller shopping centres	●	-	-	●	-	-	-	-	-	-	-	-	-	-	?	Protecting local shops is essential in maintaining local communities and in reducing the need and distance travelled to meet day-to-day needs. This objective is closely related to OBJ3f. Shops

