

Bridgend Local Development Plan

2006-2021

Cyngor Bwrdeistref Sêl



**Sustainability Appraisal & Habitats Regulations
Assessment of the LDP Amended Allocations**

February 2013

**Bridgend County Borough
Council**

**Sustainability Appraisal and
Habitats Regulations
Assessment of the Local
Development Plan**

Amended Allocations

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Plan
Additional Allocations

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Sustainability Appraisal and Habitats Regulations Assessment of the Local Development Plan

Additional Allocations

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1 Introduction

1.1 Purpose

- 1.1.1 This Report provides an addendum to the Sustainability Appraisal (SA) (incorporating Strategic Environmental Assessment) and Habitats Regulations Assessment (HRA) Reports prepared of the Bridgend Local Development Plan (LDP).
- 1.1.2 The report has been prepared to take into account changes that Bridgend County Borough Council (BCBC) have decided to make following recommendations of the Planning Inspector. These recommendations were set out in the preliminary findings report covering housing and employment land need and supply¹.
- 1.1.3 As a result of BCBC's proposed changes it is necessary to review the SA and HRA prepared of the Deposit LDP. The purpose of which is to evaluate if the changes have the potential to have an impact on sustainable development objectives and the protection of internationally designated nature conservation sites.
- 1.1.4 This addendum report is prepared by Peter Brett Associates LLP. Peter Brett Associates includes the former Baker Associates, who were the authors of the previous versions of the SA and HRA.

1.2 Proposed Changes to the Local Development Plan

- 1.2.1 BCBC have prepared a paper to submit to the Planning Inspector during the examination process to set out their proposed revisions to the LDP to take into account the recommendations.
- 1.2.2 The proposed revisions to the LDP are to:
- Increase the residential growth figure for the County Borough from 9,000 to 9,690 in the LDP and increase the supply from 9,995 to 10,660.
 - Reduce the overall employment land allocation for the County Borough;
 - Alter identified site allocations to increase housing yield by 765 dwellings, either through extending sites or change allocated use; and
 - Identifying additional sites for housing growth.
- 1.2.3 These changes affect some elements of the LDP that previous SA and HRA reports commented on. It is therefore necessary to revisit the content of these plans to ensure that the proposed revisions remain in keeping with the requirements of SA, including Strategic Environmental Assessment (SEA) and HRA. A summary of the changes to sites proposed as a result of the Planning Inspector's findings are shown in **Appendix 1**.

¹ R.P.E. Mellor (16 January 2013) *Bridgend Local Development Plan Examination Inspector's Preliminary Findings – Housing Land Need and Supply, Employment Land Need and Supply*.

2 Addendum to Sustainability Appraisal including Strategic Environmental Assessment

2.1 Introduction

- 2.1.1 This section of the report provides an addendum to the SA / SEA Report that was prepared of the emerging plan. The most recent version of the SA was 'Sustainability Appraisal of the Bridgend Local Development Plan' (Revised Version, March 2012)², which can be found on the Bridgend LDP website. It is this version of the SA Report that is being referred to in this addendum.

Sustainability Appraisal and Strategic Environmental Assessment

- 2.1.2 The requirement for Sustainability Appraisal (SA) comes from Section 39 of the Planning and Compulsory Purchase Act 2004. This states that authorities preparing LDPs should have regard to the objective of contributing to sustainable development. The need for SEA arises from 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 SEA Directive). The SEA Directive requires environmental assessment during production of certain plans and programmes which are likely to have significant effects on the environment. The Directive has been incorporated into Welsh law through the Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 (the SEA Regulations). It applies to all LDPs.

2.2 Higher Housing Provision

Quantity

- 2.2.1 BCBC have agreed with the Planning Inspector's findings in that the Deposit LDP identified housing supply is too low and should be increased by 765 homes. This has resulted from an increase in the total identified need from 9,000 to 9,690 and the supply from 9,690 to 10,660. The Inspector identifies that this higher figure can be more robustly defended by the evidence the Council has gathered to support the LDP preparation.

Previous Sustainability Appraisal

- 2.2.2 In 2007 Baker Associates (now Peter Brett Associates LLP) prepared a brief sustainability statement³ to show the relative sustainability impacts of implementing the alternative approaches to growth in Bridgend.
- 2.2.3 This report considered the differing impacts of implementing high, medium and low levels of growth from the growth options report. The assessment is reported on in chapter 7 of the SA Report of the Deposit LDP, with the appraisal table of the growth options included as Appendix 2 to that SA Report.

² Baker Associates (March 2012) *Sustainability Appraisal of the Bridgend Local Development Plan - Revised Version*
³ <http://www.bridgend.gov.uk/web/groups/public/documents/report/044111.pdf>

Implications for the Sustainability Appraisal

- 2.2.4** In terms of achieving more sustainable development this relatively modest increase in housing numbers would have only minor implications for sustainable development. The additional figure of 765 homes would only represent an increase of around 96 homes a year over each remaining year of the plan period (2013 to 2021).
- 2.2.5** More than the overall additional housing provision; it is the selection of sites to deliver this growth will have the greatest implications for achieving sustainable development. Site implications are addressed in **Section 2.4** of this addendum report. However, it is possible to make some assumptions about what additional housing growth might mean for environmental, social and economic sustainability.

Environmental

- 2.2.6** The increased housing requirement is likely to require some additional land to be allocated for housing. Some of the extra homes can be located on existing allocations, by making changes to the mix of land uses or increasing site density. However, to meet the increased need, development will also have to be on greenfield sites and sites that have been long-term unoccupied so have been re-colonised by wildlife. Therefore, there is the potential for adverse landscape and biodiversity impacts, but these will depend on the choice of sites and the way development is delivered.
- 2.2.7** Providing more homes to meet needs within the County Borough can play a role in reducing commuting by allowing people to live near their jobs if they wish to. This can play a role in reducing car travel and therefore have potential benefits for the environment, for instance from reducing congestion and air quality impacts.
- 2.2.8** Additional housing may result in an increase in resource requirements in their construction and operation. However, it is not clear if just because these homes are not built in Bridgend County Borough that they will not be built at all. Therefore, it is not possible to say with any certainty that there will be negative environmental impacts relating to this.

Economic

- 2.2.9** The quantity of employment land allocation in the district is high, so additional land requirements for housing are unlikely to have an impact on availability of sites for economic growth.
- 2.2.10** Setting a reliable figure for housing provision over the plan period is also important to support a workforce for the businesses of the County Borough. Even if the economy of the area is experiencing a downturn due to the recession, housing provision needs to take a long term view and consider the economic potential of the County Borough over the whole plan period.

Social

- 2.2.11** One of the principal advantages of setting a higher target for housing in the plan period is the benefit that this may have in delivering a greater number of homes to meet general needs, as well as a greater number of affordable homes. This further supports the positive aspects of housing delivery referred to in paragraph 10.7 of the SA Report of the Deposit LDP.
- 2.2.12** There is evidence that there is a high demand for affordable homes in the County Borough, exacerbated through the economic downturn. However, it is likely that only around 20% of new housing would be built as affordable.

Changes to Sustainability Appraisal

- 2.2.13** Following the initial findings of the Planning Inspector over the County Borough's proposed housing growth levels there may be greater certainty that the housing numbers proposed for the LDP are suitable. This means that paragraph 7.16 of the SA Report of the Deposit LDP is no longer relevant as the proposed level of housing is now justified by evidence and has the support of the Planning Inspector.

2.3 Lower Employment Land Allocation

- 2.3.1** The proposed increase in housing allocation in the LDP as a result of the Planning Inspector's findings has resulted in a loss of employment land allocation as sites are reallocated for a greater proportion of housing.
- 2.3.2** In the SA Report of the Deposit LDP there is some comment on the quantity of employment land that is allocated. The report queries the quantity of land that is allocated for this use and whether this is the most suitable use of the land resources in the County Borough. This high allocation may be ring-fencing land for uses that will not come forward, meaning alternative sites for uses such as housing have to be found, including greenfield sites. There is the risk that over allocation of employment land may result in the need for some less sustainable sites needing to be allocated for housing. Therefore, as a result of the proposed changes there could be benefits for sustainable development.
- 2.3.3** The choice to reallocate sites for housing rather than economic use is a positive decision for sustainable development. The choice means that less new land needs to be allocated to meet the increased housing provision for the LDP. Therefore, there will be benefits by reducing the need for greenfield land take. This has the potential to reduce the biodiversity and landscape impacts, as well as other possible advantages for instance related to flood risk.
- 2.3.4** Evidence provided as background to the LDP and as reviewed by the Planning Inspector indicates that quantity of employment land allocated in the LDP would remain more than sufficient, even where some is lost to housing. Therefore, the Council's plan objective of sufficient sites to respond to different market and business needs remains intact and the loss of sites should not affect economic delivery.

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- 2.3.5** In terms of sustainable development the SA retains the opinion that there may be increased benefits for the sustainable use of land by further reducing employment land allocation, as set out in the assessment of employment growth in paragraphs 7.19 to 7.24 of the SA Report of the Deposit LDP.
- 2.3.6** Specific issues relating to the reallocation of employment sites for housing are covered in **Section 2.4** of this Report.

2.4 Site Allocations

Options for Site Allocation

2.4.1 The Council have had to identify additional sites within the plan area to accommodate the increased housing provision as set out in the Planning Inspector's findings. This means the options for delivering additional housing are:

- Increasing proposed housing densities to get a higher yield from the same sites;
- Identifying sites where 'Alternative Site' representations suggest a minor site boundary revision to allow more development to be accommodated;
- Finding sites where land could be re-allocated from alternative uses to increase housing yield; and/or
- New sites.

2.4.2 The Council's approach to accommodating growth was to first look at the identified 'Mixed Use Regeneration Sites' to assess if these could accommodate the extra growth (these sites have the prefix PLA3). These sites have already been selected for their potential to address the regeneration needs of the County Borough, primarily in the Strategic Regeneration Growth Areas (SRGA). Therefore, it is unlikely that directing additional housing growth to these locations would be incompatible with the delivery of the LDP's housing strategy.

2.4.3 The other source of sites is from the pool of sites put forward at the 'Alternative Sites' consultation process (these sites have the prefix AS). BCBC therefore looked for sites that fit with the spatial strategy already established and consulted on. The spatial strategy focuses new development where they can deliver regeneration benefits to the SRGA as set out in policy SP1 and in accordance with the settlement hierarchy of Policy PLA1.

2.4.4 This spatial strategy has already been subject to scrutiny as part of the SA process. The reported findings and recommendations of the SA are shown in chapter 9 and the policy appraisal of Appendix 4 of the main SA Report of the Deposit LDP. The findings of the SA of the spatial strategy were largely positive with new development being focused in the areas of greatest demand and that can support more sustainable access. Therefore, the allocation of additional sites in keeping with the strategy should also be compatible with achieving broad objectives for sustainable development.

Choosing from Alternatives

- 2.4.5** In addition, to meet the requirements of the Strategic Environmental Assessment (SEA) Directive there must be some demonstration that alternative ways of delivering development have been assessed to allow identification of their relative environmental effects. The Directive states assessment must take place of: *“reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme”* (paragraph 12(2)). Therefore, it is important that comparable information is available on all the sites proposed for allocation to allow the Council to make an informed choice of sites from reasonable alternatives.
- 2.4.6** All of the sites proposed for development have been subject to environmental or sustainability appraisal, allowing for the relative performance of sites to be assessed in accordance with the SEA Directive requirements and suitable sites identified. There are two main types of sites and the sustainability appraisal of each type has been carried out in a slightly different, but comparable, way. These are:
- Sustainability of appraisal of existing sites allocated in the LDP Deposit; and
 - Sustainability of ‘Alternative Sites’ put forward at consultation.

Sustainability Appraisal of Existing Site Allocations

- 2.4.7** Various types of sustainability and environmental assessment have been completed for all of the sites put forward for consideration. Although these other assessments have not been part of the main SA process by Baker Associates (Peter Brett Associates), the method of assessing Allocated Sites has been part based on the sustainability objectives developed for the SA process by Baker Associates. In addition, a site assessment methodology note prepared by BCBC in 2009 was reviewed and validated by Baker Associates. The purpose was to ensure environmental issues were being considered in a way that meets the requirements of the SEA Directive and provides a way of assessing alternatives in a robust and consistent way. More information on the method of site Sustainability Appraisal process can be found in the *Guidance on the Sustainability Appraisal of Alternative Sites*⁴ (BCBC, June 2011) and as reported in the SA Report at paragraphs 3.15 and 3.23.
- 2.4.8** This means all allocated sites in the submission Deposit LDP have been subject to sustainability appraisal in accordance with the verified methodology note. These appraisals are shown in *‘Site Allocation Sustainability Appraisal’*⁵ (June 2011, BCBC).

Sustainability Appraisal of Alternative Sites

- 2.4.9** When sites were put forward by developers, land owners or their agents as part of the ‘Alternative Site’ consultation, they were required to complete a sustainability appraisal of their sites in accordance with the verified methodology. Therefore, for all ‘Alternative Sites’

⁴ <http://www.bridgend.gov.uk/web/groups/public/documents/report/091924.pdf>

⁵ <http://www.bridgend.gov.uk/web/groups/public/documents/report/090128.pdf>

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there is a developer prepared sustainability appraisal. These can be found as part of the representations on LDP 'Alternative Sites' consultation page.

- 2.4.10** These 'Alternative Site' sustainability appraisals are further supported by the Council's report '*Consultation Report Volume 2 – Appendix J: Alternative Site Representations and Council Response*'⁶ (BCBC, May 2012). At this stage the Council compiled information on each site, including environmental considerations such as proximity to designated nature conservation sites, agricultural land or flood risk. Consultation was also carried out for each site and this is recorded on the site form. Consultation included with statutory consultees (including CCW, Welsh Water and the Environment Agency), general consultees, and internal consultees (highways, countryside, drainage etc.). This therefore, provided good coverage of potential environmental concerns at each of the sites.

New and Revised Site Allocations

- 2.4.11** In practice the selected sites are based on a combination of sources taking into account the review of regeneration sites and the pool of 'Alternative Sites'. **Appendix 1** lists all of new allocated sites; it shows that out of eleven sites:

- Only two sites are entirely new (AS032 and AS052);
- Five sites are a partial reallocation from employment and or community uses to provide more space for housing (PLA3(1), PLA3(2), PLA3(4), PLA3(10) and AS027);
- One site is a total change from a mixed use housing and employment allocation to 100% housing (PLA3(20));
- Two sites are a minor boundary change and higher density proposed for development (AS056 and AS060); and
- One is a reduction in housing numbers in the plan period to reflect a realistic delivery estimate (PLA3(8)).

Addendum Sustainability Appraisal of Sites

- 2.4.12** **Appendix 1** shows the full list of sites that have been amended to take into account the Planning Inspector's findings. As the previous version of the SA Report did not look in detail at the sustainability of individual sites for allocation it is not the role of this addendum to do so either. However, it is worth considering a few implications of the proposed changes and what this may mean for achieving sustainable development. In addition, **Appendix 2** of this report contains a schedule of proposed amendments to the SA Policy Matrices of Appendix 4 of the SA Report, which includes comments on specific site allocations.

Improving Viability of Employment Sites

- 2.4.13** Several of the sites had the quantity of employment allocation reduced in favour of housing development. Two of these sites Ty Draw Farm and North East Brackla have had

⁶ <http://www.bridgend.gov.uk/web/groups/public/documents/report/100110.pdf>

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employment land released for housing to help make the employment development on the site more viable.

- 2.4.14** The SA Report already noted at paragraph 10.48 that there may be difficulties delivering some employment sites and funding may be required. The paragraph states that: *"Some employment sites may need public funding to aid delivery"*. The partial reallocation for housing provides this funding instead.
- 2.4.15** No public funding is available on either of these sites to provide the infrastructure and other development costs to deliver new economic development. Therefore, releasing the land for housing can enable this employment development. The benefits are therefore to provide jobs in the short to medium term on these sites. However, there is the risk that reducing the supply of employment land may impact on the delivery of more accessible jobs. This may be especially true at Ty Draw Farm in the west of the County Borough where currently employment land supply is limited. The Council should therefore ensure that the employment growth at Ty Draw Farm is maximised as this could have benefits for local residents in terms of equity of access to work, as well as being compatible with objectives of reducing car travel.

Community Facilities

- 2.4.16** Two of the sites proposed for change will see the loss of space previously allocated for community uses.
- 2.4.17** At Parc Derwen the community space in the previous allocation is being integrated into the land allocated for a school (without an increase in land area for the school). This is a large development site and closely associated with North East Brackla to the south, combined they will deliver over 2,000 new homes. Therefore, it is essential that the development is served by community facilities to meet the needs of new residents and help in creating sustainable communities and neighbourhoods, which are characterised by having a range of shops and services a walkable distance from a large proportion of new homes.
- 2.4.18** This means that the combined school and community use should still provide the services the community need of the size and type as would be delivered on a standalone site. If this is not the case then there may be adverse impacts on social sustainability, which could include essential health effects, as well as impacts from increasing the need for residents to travel by car to access services.
- 2.4.19** At Land off Maesteg Road, Tondu, the allocation for a school on the site has been removed and replaced by housing. The education authority has reported that they no longer view this site as suitable for a new school and will provide it elsewhere in the catchment. Therefore, this loss is not significant in terms of access to the school. As with Parc Derwen this site is part of a large development area with a range of new homes and services being built on this and nearby sites. Therefore, as part of making a sustainable community the LDP will need to make sure local community services are being provided that will meet the needs of new residents and help reduce car travel. It is noted, that available vacant land as part of the

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extended Aberkenfig commercial area, which forms part of the development site, could provide a suitable opportunity for this.

Porthcawl Waterfront

- 2.4.20** The proposed changes also result in a reduction of housing numbers to be delivered at the Porthcawl Waterfront Regeneration Area. The site has planning permission for 1,350 houses, which is a significant proportion of the overall housing provision for the County Borough. However, delivery of homes on the site has been slow. Therefore, it is proposed that 300 are moved out of the current plan period as it more likely they will be built after 2021. This change of allocation provides greater certainty of housing delivery in the plan period. The LDP can allocate alternative sites that are more likely to be delivered in the plan period, and therefore provide the homes needed.

New Sites

- 2.4.21** As previously noted only two sites are entirely new to the plan. These are the land at Llangwydd Road, Cefn Glas and land at Waterton Lane, Bridgend.

- 2.4.22** The former of these two sites is in a greenfield location on the western periphery of the Bridgend area. The site is designated as a Special Landscape Area, although appraisal shows that it is largely self-contained and not part of the wider landscape. However, the site is in quite a peripheral location on the edge of the urban area, so there will be a need to demonstrate how future residents will be able to access to shops and services either a walkable distance away or by regular and frequent public transport. Without this there is the risk that residents in this location will be reliant on travel by car to meet their day to day need, contrary to objectives of reducing car travel. Landscaping and high quality design will also be needed to soften the urban edge of the site and views from the countryside.

The site at Waterton Lane is in close proximity to Parc Afon Ewenni and is in an area of similarly poor residential amenity as industrial and business parks that surround the site and main road. Consideration will need to be given to how development will be integrated into the wider urban area of Bridgend, including safe walking and cycling routes into the town and other non-car access to shops and everyday services, such as schools. At present there is the likelihood residents at these sites would be dependent on car use to meet their day to day needs and feel cut off from the wider urban area.

3 Addendum to the Habitats Regulations Assessment

3.1.1 This section of the report provides an addendum to the Habitats Regulations Assessment (HRA) Report prepared of the LDP Deposit Proposals (March 2012)⁷ by Baker Associates (now PBA).

3.1.2 The purpose of the HRA Report is to meet the requirements of the European Directive (92/43/EEC) on the 'conservation of natural habitats and wild fauna and flora', also known as the Habitats Directive. Articles 6(3) and 6(4) of the Directive require that plans (including LDPs) are assessed to identify if they could cause harm to European designated nature conservation sites.

3.1.3 It is therefore necessary to assess the proposed changes that are being made to the LDP in light of the Planning Inspector's findings to see if there is potential for these to cause harm to three protected sites screened into the assessment in the previous stages of the HRA. These sites are:

- Kenfig Special Areas of Conservation (SAC) including Merthyr Mawr Warren and Kenfig Burrows;
- Cefn Cribwr Grasslands SAC; and
- Blackmill Woodlands SAC.

Changes in Housing and Employment Land Allocations

3.1.4 Chapter 5 of the HRA Report of the Deposit LDP comments on the level of housing and employment growth proposed in the LDP. Housing need in the LDP has now risen to 9,690 (although land for 10,660 homes is allocated), whereas the employment land supply has dropped from 164 hectares to 102 hectares.

3.1.5 The increase in the amount of housing allocated in the plan has the potential to impact on the designated sites in the same ways, but to a greater extent, as the current housing allocation. Although this is partly offset by the fact that a large proportion of the additional housing is sought as an alternative to use to the employment previously proposed. The bullet points at paragraph 5.6 of the HRA Report shows the mechanisms by which housing growth could have an effect on the designated sites. The increase in housing numbers has the potential to have an effect on these mechanisms including:

- increasing the demand for water;
- causing the possible decrease in water quality; and
- increasing car travel with impacts for air quality.

⁷ Baker Associates (March 2012) *Habitats Regulations Assessment of the Bridgend Local Development Plan – Deposit Proposals*

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- 3.1.6** However, the quantity of additional housing put forward in the changes is not of a scale where it is possible to identify with any greater certainty the impact on designated sites via these mechanisms. Therefore, implementing the measures proposed in the HRA Report of the Deposit LDP remain the most appropriate way to mitigate and avoid effects to manage impacts from these sources
- 3.1.7** The reduction in employment land supply is unlikely to have any significant impact, as employment will only take place at a rate the market wish to deliver it. Therefore, despite the change in allocation actual delivery is unlikely to be affected and the findings of the HRA Report of the Deposit LDP still stand.

Site Allocations

- 3.1.8** It is also necessary to consider if any of the additional sites put forward to accommodate the increased housing provision will have an impact on the internationally designated nature conservation sites.
- 3.1.9** Appendix 6 of the HRA Report 2012 reviewed each of the development proposals to identify the potential for impacts on the three nature conservation sites. **Appendix 3** of this addendum report updates that appendix to consider each of the additional and revised allocations.
- 3.1.10** As **Appendix 3** shows there is only one site identified where there could be potential for an impact. This is site AS027 Ty Draw Farm, Pyle, which is within 2km of Kenfig Burrows (part of the Kenfig SAC). The site was previously allocated only for employment, will now be reallocated for employment and 94 new homes. Therefore, there is a risk that additional resident population in close proximity to the Burrows could put extra recreational pressure on the nature conservation site. However, it is likely that any adverse impacts can be avoided by the organisation responsible for managing the site and by preparing and implementing an access and management plan.

4 Summary

4.1 Sustainability Appraisal

- 4.1.1 The review of the proposed changes to the housing and employment allocations as a result of the findings of the Planning Inspector are not likely to have any significant effects on achieving sustainable development.
- 4.1.2 There will be advantages of providing more homes to meet needs in the plan and this is supported by new evidence. Reducing the employment land allocation is unlikely to have an adverse impact on objectives for economic growth in the County Borough as land availability is still well beyond what is required over the whole plan period based on the existing and recent rates of employment growth in the area.
- 4.1.3 As with the previous stages of SA, this stage does not look in detail at the sustainability of individual sites. However, for all sites a sustainability assessment has been carried out by BCBC or by the developers promoting the sites. In addition, all Alternative Sites have also been consulted on with statutory consultees, including environmental bodies to assess their potential environmental effects. Therefore, the Council have been able to make an informed decision when making decisions about new sites allocations and amendments as the environmental implications are made clear.
- 4.1.4 However, in reviewing the new allocations it is possible to identify some potential implications for sustainable development. These are:
- The potential to enable development of employment areas by releasing land for housing; this will help make employment delivery financially viable by contributing towards infrastructure and other development costs;
 - Revision of housing numbers at the Porthcawl site represents a more realistic delivery of housing at this site, enabling alternative sites to be allocated that will help meet the housing need in the plan period;
 - Delivery of the new greenfield site at Llangewydd Road will need to ensure that development is delivered in a way that is sensitive to the Special Landscape Area and views from the countryside;
 - Several sites may currently have poor access to essential services by public transport, walking and cycling, delivery of these sites should be able to demonstrate how this could be improved, including at Waterton Lane and Llangewydd Road;
 - Residential amenity should be considered in delivery of sites, such as Parc Afon Ewenni and Waterton Lane that are currently quite isolated from other areas of residential development; and

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- Land for community uses is to be lost as part of the proposed changes, this loss will need to be justified and assurance given that this will not adversely impact on the delivery of new sustainable communities in these locations.

4.2 Habitats Regulations Assessment

4.2.1 The overall changes in the quantity of proposed development are not likely to create any additional risks of harm to the internationally designated nature conservation site identified in the 2012 HRA Report.

4.2.2 The reallocation of the employment site at Ty Draw Farm may have the potential to create additional recreational pressure at Kenfig Burrows SAC. However, impacts can be mitigated and avoided through implementation of a site management plan.

Appendix 1: Summary of Additional and Revised Sites for Allocation

Summary of proposed changes to site allocations and identification of existing site assessment information for each site

Site Name	Location	Change in housing numbers (total in brackets)	Change in employment land allocation (total in brackets)	Changes to current allocations required	Notable change	Site Assessment information, including sustainability and environmental appraisal
PLA3(1) Parc Derwen	Bridgend SRGA	+15 (1515)	0 (0)	COM1(1) COM9(2)	Loss of community building and higher density.	<ul style="list-style-type: none"> Site Allocation Sustainability Appraisal (June 2011, BCBC)
PLA3(2) North East Brackla	Bridgend SRGA	+200 (550)	-5.8 ha (8.2ha)	COM1(2) REG1(1)	Loss of employment land	<ul style="list-style-type: none"> Site Allocation Sustainability Appraisal (June 2011, BCBC)
PLA3(4) Parc Afon Ewenni	Bridgend SRGA	+100 (650)	-6 ha (2.0ha)	COM1(3) REG1(6)	Loss of employment land	<ul style="list-style-type: none"> Site Allocation Sustainability Appraisal (June 2011, BCBC)
PLA3(8) Porthcawl Waterfront Regeneration	Porthcawl SRGA	- 300 (1050)	No change	COM1(24)	Delivery beyond the plan period.	<ul style="list-style-type: none"> Site Allocation Sustainability Appraisal (June 2011, BCBC)
PLA3(10) Land West of Maesteg Road, Tondur	The Valleys Gateway SRGA	+103 (538)	-1.7 ha (1 ha)	COM1(30) REG1(21) COM10 (8)	Loss of employment land and primary school.	<ul style="list-style-type: none"> Site Allocation Sustainability Appraisal (June 2011, BCBC)
PLA3(20) Coronation Works, Evansbwn	Small Settlement or 'Other Areas'	+11 (11)	Not defined	PLA3(20) REG1(25)	Reallocation for 100% housing.	<ul style="list-style-type: none"> Site Allocation Sustainability Appraisal (June 2011, BCBC)
AS027 Ty Draw Farm, Pyle	Strategic Employment Site and Main Settlement	+94 (94)	-3.81 ha (2.23ha)	SP9(4)	Reallocation from a Strategic Employment Area to a mix of housing and employment.	<ul style="list-style-type: none"> Consultation Report Volume 2 – Appendix J: Alternative Site Representations and Council Response (BC8C, May 2012) Site Allocation Sustainability Appraisal (June 2011, BCBC) Site promoters own SA**
AS032 Land at Llangewydd Road, Cefn Glas	Bridgend (Primary Key Settlement)	+228 (228)	0 (0)	NEW SITE	New green field allocation.	<ul style="list-style-type: none"> Consultation Report Volume 2 – Appendix J: Alternative Site Representations and Council Response (BC8C, May 2012) Site promoters own SA**
AS052 Land at Waterton Lane	Bridgend SRGA	+42 (42)	0 (0)	NEW SITE	New – in close proximity in PLA3(4)	<ul style="list-style-type: none"> Consultation Report Volume 2 – Appendix J: Alternative Site Representations and Council Response (BC8C, May 2012) Site promoters own SA**

Site Name	Location	Change in housing numbers (total in brackets)	Change in employment land allocation (total in brackets)	Changes to current allocations required	Notable change	Site Assessment information, including sustainability and environmental appraisal
A5056 S. Wales Policy HQ or Land at Cowbridge Road, Bridgend	Bridgend SRGA	+8 (138)	0 (0)	COM1(5)	Increase in land area of 0.3ha	<ul style="list-style-type: none"> • Consultation Report Volume 2 – Appendix J: Alternative Site Representations and Council Response (BCBC, May 2012) • Site Allocation Sustainability Appraisal (June 2011, BCBC) (less extra 0.3 ha) • Site promoters own SA**
A5060 Y Parc, Maesteg	Maesteg and Llynfi Valley SRGA	+31 (51)	0 (0)	COM1(20)	Increase in land area by 0.3 ha and increase in site density.	<ul style="list-style-type: none"> • Consultation Report Volume 2 – Appendix J: Alternative Site Representations and Council Response (BCBC, May 2012) • Site Allocation Sustainability Appraisal (June 2011, BCBC) (less extra 0.3 ha) • Site promoters own SA**

* SRGA: Strategic Regeneration Growth Area

** Can be found at: http://www.bridgend.gov.uk/web/groups/public/documents/services/094762_bcsd

Appendix 2: Addendum to Appendix 4 'SA of Policies' from the SA Report of the Submission Version of the Deposit LDP

Addendum to Appendix 4: SA Policy Matrices

These tables are an addendum to the policy matrices shown in Appendix 4 of the main SA Report of the submission Deposit Local Development Plan (March 2012). The text of the SA matrices as they are shown in the Appendix 4 remains relevant and should be read in conjunction with the addendum text.

Changes have only been made to the matrices for policies that will be affected by the proposed alterations to allocations and housing and employment numbers as a result of the Planning Inspector's findings.

PLA3 - Regeneration and mixed use development schemes

PLA3(1) Parc Derwen

This is a large predominantly greenfield site that already has a planning permission for 1500 new homes. The incorporation of standalone community services into the school site may have no adverse sustainability implications. However, it is important that this does not mean the type and purpose of community uses are lost. Creating a sustainable neighbourhood in this location will be dependent on access to local services without needing to travel into central Bridgend. These services should meet local resident's needs and preferably be within walking distance of a large proportion of new homes.

PLA3(2) North-East Brackla Regeneration Area

The loss of almost 6 ha of employment land at this site would still leave over 8 ha available for this use. This lower level of employment growth at the site may be more realistic than the larger quantity, especially as the site is no longer in public ownership and so there is less likelihood of public funding to provide the infrastructure required on the site. The increase to 550 homes on the site may help facilitate delivery of the economic uses by making the scheme more viable. This may have benefits for the local economy by providing economic growth and jobs in the short to medium term. However, the loss of employment land in this area may have an effect on the potential economic role of growth in north east Bridgend from the combined development of PLA3(1) and PLA3(2).

PLA3(4) Parc Afon Ewenri

It is proposed that this site loses the majority of its employment allocation to now provide only 2 ha, with the additional land to provide for 100 more homes. The only possible disadvantage of these new homes may suffer from adverse amenity by being in an area characterised by industrial and business development with the centre of Bridgend some distance away.

PLA3(8) Porthcawl Waterfront Regeneration

The revision of the quantity of committed development at the site expected to be delivered in the plan period has been reduced by 300 units. This amendment is realistic due to existing take-up rates. This means the housing numbers released must be reallocated to alternative sites where there is the more certainty of development coming forward.

PLA3(10) Land west of Maesteg Road, Tondy

There are an additional 102 homes allocated at this site in addition to the housing already committed. To accommodate this growth employment land has been lost leaving only 1 ha. This reduction may have implications for access to work in this part of the County Borough as this a quite a peripheral location. The land for a new school has also been deleted to be replaced by housing. In terms of creating and supporting sustainable new communities it would be useful to be able demonstrate that this site is not better used to meet other community needs, in place of a school.

PLA3(20) Coronation Works, Evanstown

The site is now allocated for 100% residential use, whereas it was previously shown as a mixed use site. This site is very peripheral and would have been beneficial to access to local jobs if the site had been developed for economic purposes. New housing may however meet a local need.

Main impacts / mitigation / recommendations

- There is a need to ensure that space for community uses is not lost to alternative uses where there is an identified local need.

<p>ENV3 – Special Landscape Areas</p> <p>Any land removed from this allocation, for instance to accommodate site AS032, will need to demonstrate that it is not integral to the character of the wider landscape setting.</p>
<p>SP9 – Employment and the economy</p> <p>Changes in housing allocations have resulted in the loss of employment land from a previous total of 164 hectares (it is estimated that the new employment land supply would be around 102ha). However, this means there is a significant amount of employment land remaining allocated well above that it is needed based on take-up rates. Therefore, there are unlikely to be any significant effects of this on the economic objectives for the County Borough.</p> <p>SP9(4) Ty Draw Farm, North Cornelly</p> <p>The employment allocation of this site is to be significantly reduced under proposed changes to only 2.23 hectares (from 6 ha) with 94 homes now allocated on the site. The new homes may help make employment development more viable on the site and therefore have potential benefits for new job creation in the short to medium term. The reduction in employment allocation in this area does mean that the western part of the County Borough is less well served in terms of employment land than other areas, with possible implications for access to work (if it were viable possible to deliver the full 6 hectares).</p>
<p>REG1 – Employment sites</p> <p>The revised total employment land supply identified in the LDP will now be around 102ha from a previous total of 164ha. The change has resulted in alterations of four of the employment sites allocated in this policy to make way for housing. These sites are:</p> <ul style="list-style-type: none"> • REG1(1): North East Brackla, • REG1(6): Parc Abn • REG1(21): Land west of Maesteg Road • REG1(25): Coronation Works, Evanstown <p>All of the sites with the exception of Coronation Works will retain an element of employment use. For North East Brackla and Parc Afon Ewern the release of land for housing may aid the delivery of employment by making them more financially viable (for instance paying for infrastructure and section 106) and helping delivery of jobs in the short to medium term. The loss of all employment at Coronation Works may have implications for access to employment in this relatively isolated village, although there is no certainty that this site would be delivered for this use in the plan period.</p>
<p>SP12 – Housing</p> <p>The changes made as a result of the Planning Inspector's findings increase the housing provision in the plan to 10,660 from 9,995 and therefore represents a more realistic figure required to meet needs. This increase reflects more accurate evidence on the housing need based on population increase and household size. In total the revision to allocations and new sites would deliver around 831 new homes. It is not clear what proportion would be delivered as affordable homes, but of the total 831 a total of around 20% could be expected – providing around 166 new affordable homes.</p> <p>The revisions have yet to make clear how the new development would be distributed to various phases of the plan period.</p>

COM1 – Residential allocations in the Strategic Regeneration Growth Areas

The proposed changes to take into account the Planning Inspector's findings would see changes to sites allocated through this policy. This would change allocations COM1(1), (2), (3), (5) and (30) to increase the quantity of allocated housing. COM1(24) would also see a reduction in allocated housing. New sites will also need to be added to take account of new housing allocations at Ty Draw, Llangwydd Road and land at Waterton Lane. Llangwydd Road and Waterton Lane sites both have relatively poor access to services, with the site the former in peripheral location and the latter in a cut-off location. In addition, landscape and biodiversity protection will need to be a consideration of development at Llangwydd Road including treatment of the urban edge. At Waterton Lane consideration will need to be given in design and delivery to the amenity issues at the site, as surrounding industrial areas and the road may have adverse impacts.

COM9 – Provision of community buildings

The changes will result in the de-allocation of COM9(2) where a community use is being lost as a standalone part of the development site and being incorporated into a new primary school. Losing this use may have implications for community use in this large new housing development and it will need to be ensured that the community use delivered is still one that helps create a sustainable new community.

COM10 – Provision of educational and training facilities

COM10(8) is no longer allocated for an education use at the land west of Maesteg Road, Tondur. There is some evidence that the education authority no longer want to deliver a school at this site. However, the LDP should ensure that there are alternative community uses in the area to help support the creation of a sustainable new community at this large redevelopment site, as well as supporting existing residents of Tondur.

**Appendix 3: Update to Habitats Regulation Assessment Report
'Appendix 6 Screening of LDP Proposals' of the Submission
Version Deposit LDP**

Update to HRA Report Appendix B: Screening of LDP Proposals

	Proposed change to quantum of development	Implications for HRA (in addition to those already identified)
Blackmill Woodlands SAC		
<i>Within 2km</i>		
None	-	-
2-5 km		
PLA3(10) land west of Maesteg Road, Tondu	Increase of dwelling yield by 102 to total of 538. Decrease employment land allocation from 2.7ha to 1.0ha	None identified.
Kenfig SAC (Merthyr Mawr Warren)		
<i>Within 2km</i>		
PLA3(8) Porthcawl Waterfront Regeneration Area	300 fewer homes to be delivered in plan period than previously allocated – to a total of 1,050. However, full 1,350 are committed and will be developed in the longer-term.	No change to potential long-term effects.
2-5 km		
COM1(5) also AS056 Land at Cowbridge Road, Bridgend	Small increase in housing numbers to 138.	None identified.
AS027 previous ref SP9(4) Ty Draw Farm, Pyle	Change of allocation to include residential – to provide at a total of 94 units. Employment land area reduced to 2.6 hectares.	None identified.
AS032 Land at Llangewydd Road	New allocation for residential use only. Allocated for 223 dwellings.	None identified.
Kenfig SAC (Kenfig Burrows)		
<i>Within 2km</i>		
AS027 previous ref SP9(4) Ty Draw Farm, Pyle	Change of allocation to include residential – to provide at a total of 94 units. Employment land area reduced to 2.6 hectares.	No change to water supply or water quality mitigation measures that need to be in place. Potential for additional impacts from human disturbance through recreation related to nearby residential development. Mitigation: As for Merthyr Mawr Warren implementation of access management plans for the site will help to avoid adverse

	Proposed change to quantum of development	Implications for HRA (in addition to those already identified)
2-5 km		impacts on the Burrows.
PLA3(8) Porthcawl Waterfront Regeneration Area	300 fewer homes to be delivered in plan period than previously allocated – to a total of 1,050. However, full 1,350 are committed and will be developed in the longer-term.	No change to long-term effects.
Cefn Cribwr SAC		
Within 2km		
A\$027 previous ref SP9(4) Ty Draw Farm, Pyle	Change of allocation to include residential – to provide at a total of 94 units. Employment land area reduced to 2.6 hectares.	None identified. The site is not publically accessible.
2-5 km		
PLA3(1) Parc Derwen, Bridgend	Change in allocation to increase residential by 15 units to 1,515.	None identified.
PLA3(2) North East Brackla Regeneration Area, Bridgend	Change in allocation to increase residential development by 200 units to a total of 550 units. Decrease in employment land allocation by 5.8 hectares to 8.2 ha.	None identified.
A\$032 Land at Llangewydd Road	New allocation for residential use only. Allocated for 223 dwellings.	None identified.