

# Bridgend Local Development Plan

2006-2021



**Adopted LDP - Sustainability Appraisal**

September 2013



BRIDGEND COUNTY  
BOROUGH COUNCIL

# **Sustainability Appraisal of the Bridgend Local Development Plan**

September 2013





# NON-TECHNICAL SUMMARY

## Introduction

1. This report is the non-technical summary of the combined Sustainability Appraisal (SA) and Strategic Environmental Assessment, of the Bridgend County Borough Council Local Development Plan (LDP). The main SA report shows the appraisal findings in full.
2. This non-technical summary is intended to provide an overview of the findings of the appraisal, with more detail of the process and outputs included in main report.
3. The main purpose of carrying out an SA is to assess what the impacts of development proposed in the LDP might be on the economy, the environment and society. Where potential negative effects are identified the SA then makes recommendations for how the LDP can be modified, or controls put on development, to avoid or mitigate against these. This is part of a process where successive stages of the emerging LDP are appraised and findings fed into the next stage of plan preparation.
4. The full SA report is a public document and its purpose is to show how the sustainability considerations have been integrated into preparing the LDP. The SA report is also intended to allow readers of the plan an idea of how effective the LDP might be in delivering more sustainable development, and where there might be adverse impacts.
5. The SA of the LDP has also been prepared to meet the requirements of the Strategic Environmental Assessment (SEA) Regulations. These regulations require that plans, such as an LDP, need to be assessed to identify if they would have significant impacts on the environment. Unlike SA the process of SEA is set through legislation, therefore, certain stages must be completed to comply with requirements. Specific requirements including completing a 'scoping' stages and looking at the relative impacts of alternatives.
6. The SA and SEA of the LDP have been integrated to make the process more straightforward. However, where necessary specific reference is made to SEA related findings of the appraisal/assessment process.

## Sustainability appraisal stages

7. The SA is a process that occurs throughout the preparation of the LDP. The appraisal has included several stages and reports. These demonstrate the feedback process between plan making and the sustainability appraisal, allowing sustainability considerations to be integrated into the LDP during preparation.
8. The SA reports from earlier stages of appraisal are available on the Bridgend County Borough Council website.

## **Scoping Report**

9. Part of the statutory requirements for a strategic environmental assessment is to consult with named organisations on what issues the assessment should cover. This is set out in a 'scoping report', an essential first step in appraisal, it includes:
  - a characterisation of the sustainability baseline of the County Borough, to identify key sustainability issues that should be addressed in the LDP;

- a review of other plans and programmes covering the County Borough that may influence the SA and LDP;
  - a set of sustainability objectives to define sustainable development for the SA;
  - an outline of the proposed methodology for the SA.
10. Responses from the consultees were taken into account in moving forward with the SA.

#### ***Initial SA of the Growth Options***

11. This stage of the sustainability appraisal considered the broad sustainability implications of implementing a high, medium or low level of housing growth.

#### ***Pre-Deposit Proposals Consultation Stage***

13. The sustainability appraisal looked at how the LDP would distribute the planned quantity of development around the County Borough and what this might mean for achieving sustainable development. The sustainability appraisal included appraisal of strategic policy options. The sustainability appraisal was reported alongside the Pre-Deposit LDP.

#### ***Comment on the Candidate Site Selection Methodology***

14. A review of the methodology for choosing sites to be allocated in the LDP was completed to make sure the process would help in selecting more sustainable sites.

#### ***SA of Deposit LDP***

15. The SA at this stage assessed the sustainability implications of a full Deposit version of the LDP. An initial appraisal was completed in December 2010 giving the plan makers time to take into account findings and recommendations. The report was updated in March/April 2011 to take into account comments made. The report was additionally updated prior to submission of the LDP for examination in March 2012 to take into account comments made during consultation.

#### ***SA of Amended / Alternative Sites***

16. In response to the LDP Examination Inspector's preliminary findings on housing and employment figures, the Council identified additional sites for residential development in February 2013. Some of the sites identified were new and others resulted in a reduction in employment land. An addendum SA was prepared to assess the implications of these changes and was consulted on along with the Amended Sites consultation.

#### ***SA of 'Matters Arising Changes' and the Adopted Plan***

17. This document is the SA of the Adopted Plan and brings together the deposit Plan SA together with the Amended / Alternative Sites SA. Other changes to the Plan were agreed by the Council with the Inspector. These have been appraised in a separate report which is available as a stand-alone document. In his report, the Inspector states that those changes "*are in line with the substance of the Overall Plan and its policies, and do not undermine the Sustainability Appraisal (SA) and participatory processes that have been undertaken*". The Council agrees with this assertion.

## The sustainability objectives

18. A set of sustainability objectives have been developed for the SA. These objectives are based on agreed national definitions of sustainable development, but adapted using the information gathered at scoping to tailor them to the needs of the appraisal of the Bridgend LDP. They cover a range of sustainable issues related to the protection of the environment and natural resource, the economy and society.
19. The purpose of the objectives is to provide a consistent definition of sustainable development for the SA process. The objectives, policies and proposals of the LDP can then be tested against them as part of a process of systematic appraisal. Table 1 shows the sustainability objectives.

**Table 1: Sustainability objectives for the SA of the Bridgend LDP**

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
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### Findings of the sustainability appraisal

20. The implementation of the LDP spatial strategy will need to be controlled and monitored to verify that development is being delivered and whether it is helping to deliver the chosen strategy.
21. There is an evident need in the County Borough for the delivery of development to aid regeneration of communities. The plan area will play a role in delivering employment to serve a wider south east Wales function, including supporting the continued growth of Cardiff. The delivery of development necessary to realise the strategic objectives and vision for the Local Development Plan (LDP) will primarily be by private developers. The current economic slowdown may adversely impact delivery in the next few years, including publically funded projects. Delivery will need to be monitored to allow for contingency plans to be put in place, or alternative solutions found to secure sustainable delivery. What these contingency matters are will need to be decided by the Council, and could include alternative phasing arrangements or revised housing targets. However, any policy changes would need to be considered as part of proper LDP review. LDP implementation will need to ensure that achieving sustainability and regeneration aims are not compromised by the current economic climate.
22. There will be some inevitable sustainability impacts through delivering the growth levels promoted through the LDP. These will be predominantly related to environmental sustainability resulting from the land-take, natural resource use and environmental protection. The scale of development may also have an impact on the character on the communities, with a need for a balance of jobs, homes and community services to help create new neighbourhoods. However, there will also be positive benefits for communities and the economy from LDP implementation.
23. In addition to the environmental sustainability issues raised there will also be challenges in achieving sustainability relating to travel. Without provision of an adequate and reliable public transport network, car dependency and use will increase. These impacts will be from:
  - the growth distribution of development around the County Borough
  - the peripheral location of some of the strategic allocated sites, and
  - the simple impact of there being more households and therefore more cars.
24. Increased car travel can have negative sustainability impacts related to increased congestion that can have adverse economic and health effects; and increasing air pollution contributing to climate change and health impacts. Development in the M4 corridor also risks worsening air quality in relation to increased movements of heavy goods vehicles.
25. Part of the solution to transport issues will be locating housing, employment and everyday services near one another. This is an aim for the Bridgend LDP, although the strategy as it is set out may not be entirely effective in this given the over-allocation of employment land, which may mean sites are developed out of step with housing provision.

26. It would also be unrealistic to assume that co-location of land-uses alone would reduce car use, as proximity is clearly not the only criteria in deciding where to work, shop etc. There will always remain a need to travel between settlements to access jobs, services and for shopping. Therefore, the LDP will also need to be influential in aiming for a modal shift away from car use. This may require the LDP being delivered in conjunction with other strategies that will deliver improved public transport and high quality cycle networks. It will also be the role of the LDP to lower demand for car use by setting principles for the layout and form of development to reduce car dependence, as well as setting strict maximum car parking standards and requiring developers and businesses to contribute to achieving a modal shift.
27. A further challenge to achieving more sustainable development will be from the land required to deliver the growth proposed in the LDP. There is likely to be an environmental impact from development, and therefore policies will need to be in place to guide it, in form and location, to avoid adverse impacts on biodiversity, landscape character, safeguarding minerals, the built environment and to avoid flood risk. Of particular importance is the need to avoid harm to the internationally designated nature conservation sites in the County Borough.
28. A difficulty however, with drawing any conclusions about the likely contribution to sustainable development of the spatial strategy is the quantity of development that may take place outside the defined approach. The fact that a significant proportion of the total amount of land allocated for new housing and employment is already committed for development influences implementation of LDP strategy. Development that comes forward through commitments may also not be entirely compatible with the new spatial strategy.
29. One location where the sustainability appraisal has identified that a large mismatch of housing to employment may arise is Porthcawl. Only 1% of the land allocation for employment is in this town, but 15% of housing (units) is allocated here. The result may be difficulties with residents of Porthcawl accessing jobs, leading to increased commuting. The strategy may also lead to a more rapidly aging population of the town as people move here to retire, rather than work.
30. The SA also notes that both housing and employment land allocations are beyond what is required based on past take-up rates. This also raises the risk of development on less desirable locations, such as peripheral greenfield sites. These sites are likely to be less sustainable, unless carefully planned, resulting in loss of green spaces and potentially increasing access by car.
31. The SA also reviewed all of the policies of the LDP, looking for their potential contribution to sustainable development. The policies show quite a comprehensive coverage of sustainable development issues and should help avoid many adverse impacts of implementing the quantity of development promoted through the LDP. However, there are a few additional matters identified in the SA that could be undertaken now the plan has been adopted. These additional issues are:

- Completing the Energy Opportunities plan for low carbon energy in the County Borough and transferring its recommendations to revised LDP policy and/or new masterplans or development briefs for large sites and regeneration areas;
- Developing a green infrastructure plan for multi-functional green spaces in the County Borough;
- Prioritising pedestrians on all development sites;
- Implementing the online sites database on the strategic and large mixed use development sites, to include information on delivery and implementation. Up-to-date design or development briefs should be prepared for each site. These briefs should cover sustainable development and construction, including low carbon energy provision on-site.

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## 1 Introduction

- 1.1 This document reports on the joint sustainability appraisal (SA) and strategic environmental assessment (SEA) of the Bridgend Local Development Plan (LDP). The SA/SEA has been prepared on behalf of Bridgend County Borough Council, by consultants Baker Associates, with the Council itself compiling the final report. The sustainability appraisal process is to help the implementation of the LDP to deliver sustainable development in Bridgend County Borough.
- 1.2 Sustainability Appraisal (SA) is the process by which the influence that a land use or spatial plan (in this case the LDP) would have over development and change is assessed according to the likely contribution to the desirable environmental, economic and social objectives. Embraced by a concern to achieve greater sustainability.
- 1.3 There is also the need for the appraisal to successfully integrate with the requirements of the strategic environmental regulations. Unlike SA, which has quite a broad remit, the purpose of strategic environmental assessment is specifically to provide a *“high level of environmental protection”* and to; *“contribute to the integration of environmental considerations into the preparation and adoption of plans and programmes”*.<sup>1</sup>

### **Sustainability Appraisal and Strategic Environmental Assessment**

- 1.4 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. Section 62(6) of the 2004 Act requires an authority to carry out an appraisal of the sustainability of the LDP and to prepare a report of the findings as an integral part of the process of plan preparation. Sustainability appraisal may be defined as: *‘a systematic and iterative process undertaken during the preparation (and review) of a plan which identifies and reports on the extent to which implementation of the plan will achieve the environmental, social and economic objectives by which sustainable development can be defined and identifies opportunities for improving plan performance in relation to these’*.<sup>2</sup>
- 1.5 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.
- 1.6 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.

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<sup>1</sup> Directive 2001/42/EC of the European Parliament and of the Council of 27 June 2001 on the assessment of the effects of certain plans and programmes on the environment; Article 1

<sup>2</sup> LDP Wales

- 1.7 There is a difference in the coverage of issues in SA and SEA, with SEA focusing on the environment but SA also covering social and economic issues. However, even within SEA there is consideration of the effects on people, with 'human health' and 'population' as part of the issues that should be considered in assessment. The way that these two processes are linked can be seen in Appendix 6. The appendix shows how the issues that must be considered as part of the SEA are related to the sustainability objectives developed for the SA.
- 1.8 The SEA Directive is also prescriptive in how the assessment should be completed and reported. However, the SEA and SA share a great deal of similarity in their purpose and are therefore completed as a single process. Therefore, the term SA is used jointly for all references in this report and should be taken to include the requirements of the SEA Regulations.

### **Habitats Regulations Assessment**

- 1.9 There is a third 'environmental' assessment that must be completed of Local Development Plans, this is the Habitats Regulations Assessment. However, the very specific nature of this assessment (focusing only on protecting internationally designated nature conservation sites) means joint reporting is not appropriate. Further information on the Bridgend LDP Habitats Regulations Assessment can be found on the Bridgend LDP website.

### **The LDP**

- 1.10 The purpose of the LDP is to set out the vision, objectives and preferred strategy and policies to deliver and direct growth in the County Borough. These need to show how the LDP will strategically guide development around the County Borough to ensure that its delivery helps achieve more sustainable development. For instance, through helping to create a pattern of development that reduces the need to travel, allowing new homes to be built to meet housing needs and providing diverse local employment opportunities.
- 1.11 The SA is to provide a check on the approach set out in the LDP to identify possible sustainability impacts, both positive and negative. This report documents the likely implications of the LDP on sustainable development.
- 1.12 The SA has already gone through several stages. A scoping report to provide the background to the SA process was prepared in 2006. This was made available for public consultation, and the responses received at that stage were incorporated into the SA and revised Scoping Report. An SA was undertaken of the Growth Options for development in the County Borough. Then in November 2008 an SA Report was prepared of the Pre-Deposit LDP that set out the proposed strategy for the level and spatial distribution of growth. The deposit version of the LDP was appraised in 2011 prior to consultation and then amended before the plan was submitted for consultation. The deposit plan contained policies for the spatial strategy; these were largely the same as the current SP policies of the LDP. In response to the LDP Examination Inspector's preliminary findings on housing and employment figures, the Council identified additional sites for residential development in February 2013. Some of the sites identified were new and others resulted in a reduction in employment land. An addendum SA was prepared to assess the implications of these changes and was consulted on along with the Amended Sites consultation.

Finally, those matters agreed with the Inspector as changes to the Plan have been separately appraised.

- 1.13 These earlier reports can provide a useful supplementary document to the SA process and are available for download from the Bridgend LDP pages of the Council's website [www.bridgend.gov.uk](http://www.bridgend.gov.uk).

## 2 Content of the sustainability appraisal report

- 2.1 The Sustainability Appraisal (SA) report has been prepared to meet the requirements of Strategic Environmental Assessment (SEA) as set out in regulations. However, as this SA report is the last in a continuation of SA from early LDP preparation, the other SA reports prepared as part of this provide useful background and companion documentation. These other documents are available from Bridgend County Borough Council and are available on the LDP website.
- 2.2 **Section 3** - Provides information on the SA methodology and the stages of appraisal that have been completed.
- 2.3 **Section 4** - Identifies the objectives of other strategies and plans that the LDP and sustainability appraisal should have regard to as part of getting an understanding of the sustainability issues in the County Borough.
- 2.4 **Section 5** – Describes some of the main environmental, economic and social characteristics of the Borough identified through ‘scoping’ early in the SA process.
- 2.5 **Section 6** – Identifies the sustainability objectives that define sustainable development for the LDP and appraisal
- 2.6 **Section 7** – This looks back at earlier stages of the SA on the appraisal of strategic options for growth and the distribution of development. This section is supported by Appendices 2 and 3 showing the output of earlier appraisal.
- 2.7 **Section 8** – This contains the SA of the Vision and Objectives of the LDP Strategy, supplemented by Appendix 1.
- 2.8 **Section 9** – The appraisal of the spatial strategy.
- 2.9 **Section 10** – The appraisal of the plan as a whole, including the SA of the strategic and detailed policies. Appendix 4 is an essential companion to this part of the SA containing the detail findings of the appraisal.
- 2.10 **Section 11** – This summarises how potential impacts of the LDP on sustainable development could be mitigated against, supported by the appraisal matrices in Appendix 4.
- 2.11 **Section 12** - This section sets out the monitoring proposals for the SA.
- 2.12 **Section 13** – The final section contains a summary of findings of the SA.

### 3 The approach to the sustainability appraisal

- 3.1 Sustainability Appraisal (SA) is required of the Bridgend County Borough Local Development Plan (LDP) under the regulations of the Planning and Compulsory Purchase Act 2004. Strategic Environmental Assessment (SEA) of certain plans and programmes and also required by the European Directive EC/2001/42. The aim of which is to meet the SEA and SA requirements through a common process with common reporting – jointly known as an SA.
- 3.2 This pragmatic and combined approach does not mean that the SA and findings will be compromised. The appraisal remains thorough and robust, based on the particular needs and characteristics of the area and the LDP.
- 3.3 The majority of SA work has been undertaken independently from the LDP preparation by consultants. This final document has been compiled by officers from the Council. Using independent consultants provides a proper impartial test of the planning document. It is only through being removed from the process of preparation that it is possible to give a full critical analysis of the LDP, and the identification of possible weakness or gaps. However, there have been discussions between those undertaking the SA and those preparing the LDP to allow sustainability matters to be incorporated into the LDP through more informal feedback of ideas.
- 3.4 SA is an integral part of good plan making and should not be seen as a separate activity. Its purpose is to promote sustainable development by integrating sustainability considerations into plans. By testing the emerging content of the LDP it is possible to identify any likely significant effects of the plan, and give opportunities for improving the social, environmental and economic conditions by implementing the plan. Also, with a particular reference to SEA there is a need to be satisfied that environmental considerations have been properly integrated into the plan during its preparation.
- 3.5 Sustainability Appraisal should consider several criteria:
- the long-term view of how the area covered by the plan is expected to develop
  - a mechanism for ensuring that sustainability objectives are translated into sustainable policies
  - reflect global, national, regional and local concerns
  - form an integral part of all stages of plan preparation
  - incorporate the requirements of the SEA Directive.
- 3.6 The method of sustainability appraisal uses the framework of sustainability objectives (section 6) as the basis for assessment of the LDP. By using these objectives as a general description of sustainability considerations, relevant to the role of the LDP, it is possible to assess whether the plan is helping to make a contribution to more sustainable development.
- 3.7 More detail on the derivation of these sustainable objectives is available in the SA scoping report and section 6 of this report.

- 3.8 The SA has an important role to play, not only in considering the approach set out through the strategy and supporting policies of the LDP, and its coverage of the sustainable development agenda. It also, and perhaps more significantly in this instance, considers the whole approach to the plan making and the spatial strategy put forward at this stage in LDP preparation. The reason for this is sustainable development cannot be secured unless the approach to plan making sets out an appropriately robust strategy. This is a strategy that is based on up-to-date and relevant evidence that guides all proposed new development to the most suitable locations as part of a sustainable spatial strategy. There also has to be sufficient certainty that the approach put forward through policies and proposals can be implemented in a way that acts to improve sustainability, and meet any relevant vision and objectives for the area.

### **Stages of the SA so far**

- 3.9 The SA of the emerging LDP is intended to be an iterative process, with feedback between successive stages of appraisal and the production of the LDP. This approach is to allow the potential sustainability (including environmental sustainability) implications of options considered in preparing the strategy to be made explicit. Thereby, allowing these to be taken into account in the choices made by the LDP team and helping consultees respond to the LDP.
- 3.10 **Scoping** – The first stage of the SA was a scoping exercise to identify the main sustainability issues in the plan area, to set out the approach to SA and the sustainability framework. This initial stage was undertaken in 2006. This stage has a reporting requirement with the production of a scoping report.
- 3.11 There is a statutory requirement in the SEA Directive for named environmental consultation bodies (Environment Agency, Cadw and Countryside Council for Wales) to be consulted at this scoping stage. This was the case for the SA for the LDP, however it was decided to widen this consultation to the general public. There was also a presentation of the scoping report to the stakeholder group for the LDP in order to allow input into the process. Where relevant, comments and responses were incorporated into the SA and scoping report, with a final version produced in December 2006. The final report is available on the Bridgend County Borough Council LDP website.
- 3.12 **Initial SA of the Growth Options Report** – at this stage a brief sustainability statement was produced to show the relative sustainability impacts of implementing the alternative approaches to growth in Bridgend. This considered, in a broad way, the differing impacts of implementing high, medium and low levels of growth from the growth options report. The extent of this appraisal was limited given the roll forward of existing commitments. This meant existing commitments exceeded the lowest growth option and are therefore not achievable. The appraisal table of the growth options is included as Appendix 2 to this report.
- 3.13 **Pre-Deposit Proposals Consultation Stage** – the purpose of this stage is to give an indication of what the relative sustainability implications would be of implementing the alternative spatial strategy and growth options. As well as the sustainability impacts of the chosen approach. The LDP at this stage contained policies for implementing the preferred strategy. Each of the policies was appraised

against the sustainability objectives and using a standardised matrix to ensure a systematic appraisal.

- 3.14 This version of the SA Report was put out to consultation alongside the Pre-Deposit Proposals Consultation Stage. Consultation responses on the SA Report at this stage have been taken into account in moving forward with the appraisal process.
- 3.15 **Comment on the Candidate Site Selection methods** – at this stage the plan preparation team prepared a note on the method on the site selection process for allocations. Part of choosing sites is based on their contribution to sustainable development in addition to other matters such as availability and deliverability. In August 2009 Baker Associates reviewed the methodology note to ensure it properly took into account sustainability considerations. These comments were incorporated into the methodology by the plan making team and used in site selection. These comments were informal advice to the Council and prepared as internal working notes only. However, the completed methodology is available from the Council.
- 3.16 **SA of the Deposit version** – this stage of the SA is the appraisal of the Deposit stage LDP. At this stage the additional detail added through policy and firm site allocations was subject to sustainability appraisal. However, the majority of the spatial policies of the Pre-Deposit consultation remained the same as they appeared in the Deposit version. Therefore, the comments previously made remain valid and are repeated in the SA.
- 3.17 An initial SA of the deposit LDP was completed to allow sufficient time for any matters raised to be considered by the LDP team/officers of the Council and change made if necessary. Initial SA was in November / December 2010. This deposit SA report reflected the changes made by the Council (LDP version March 2011), a summary of main changes can be found in a Changes Log which has been published separately by the Council.
- 3.18 The March 2011 SA Report was available alongside the Deposit LDP at public consultation. Responses were received on the sustainability appraisal from Countryside Council for Wales and Environment Agency Wales. A 'revised version' of the Deposit Stage SA took their responses into account, with the schedule of responses and resulting changes to the SA recorded in Appendix 7. It was this document which was submitted to the Welsh Government as part of the LDP Examination process.
- 3.19 **LDP Examination Amended / Alternative Sites** - In response to the LDP Examination Inspector's preliminary findings on housing and employment figures, the Council identified additional sites for residential development in February 2013. Some of the sites identified were new and others resulted in a reduction in employment land. An addendum SA was prepared to assess the implications of these changes and was consulted on along with the Amended Sites consultation
- 3.20 **SA of 'Matters Arising Changes' and the Adopted Plan** - This document is the SA of the Adopted Plan and brings together the deposit Plan SA together with the Amended / Alternative Sites SA. Other changes to the Plan were agreed by the Council with the Inspector. These have been appraised in a separate report which is available as a stand-alone document. In his report, the Inspector states that those

changes “are in line with the substance of the Overall Plan and its policies, and do not undermine the Sustainability Appraisal (SA) and participatory processes that have been undertaken”. The Council agrees with this assertion.

### **SA methodology for policy appraisal**

- 3.21 This SA report considers each section of the LDP in turn aiming to identify what may be the likely effects of implementing the strategic and policy approach put forward. This is supplemented by the SA matrices in Appendix 4. These matrices are an essential component of the appraisal, and should be read in conjunction with the relevant text.
- 3.22 The appraisal matrices for the strategic policies include a symbol summary of the likely impact of the policy on each of the sustainability objectives developed for the SA. However, due to the very strategic nature of the decisions being made and the high level of uncertainty this entails, this results in many impacts being identified as ‘uncertain’ and marked with a question mark. Therefore this appraisal is supplemented by text to indicate the process and thinking involved in deciding on the impact. These comments may be more useful in understanding impacts than the symbol summary alone.
- 3.23 Each matrix also contains a comment box that allows the various types of impact to be discussed, and issues that go beyond matters that can be summarised as effects against individual sustainability objectives – including unresolved issues with implications for sustainable development.
- 3.24 For the appraisal of the supporting policies a simpler approach is taken due to the role of these policies. These appraisal matrices also include identification of possible additions, amendments or alternative approaches. Some policies are also combined in a single matrix where it is identified that the matters covered are largely the same and sustainability impacts will be similar.
- 3.25 The LDP also contains site allocation policies. These are appraised as they appear, with the SA making comments on the chosen locations. The choice of sites amongst alternatives is not part of this SA. The choice of sites was carried out by the Council using a set of criteria that included sustainability considerations. The SA consultants reviewed the methodology to ensure method would address sustainability issues. Additionally, all sites included in the Plan were subject to a site specific SA which were published separately. Sites included from the Alternative Sites stage have also been subject to SA.
- 3.26 It is also evident for the appraisal that several sustainability objectives are closely related, so effects against one will result in effects against the other. For example objectives of accessibility, air quality and energy use are all closely related particularly in terms of policies relating to the need to travel and therefore are often appraised similarly.

### **Meeting the requirements of the Strategy Environmental Assessment Regulations**

- 3.27 In order to satisfy the Strategic Environmental Assessment Regulations it is necessary for the SA report to fulfil certain requirements. Table 3.1 shows how

these requirements are being met through this SA report, both as part of the main text and thorough appendices. Appendix 6 shows how the coverage of topics in the sustainability appraisal relates the issues that should be addressed in SEA. For further detail on some matters, such as the appraisal of alternatives, the SA reports of previous versions of the LDP will also provide a useful resource.

**Table 3.1: Requirements of the SEA Regulations and how they are met through the SA report**

<b>SEA Requirements</b>	<b>Covered in the SA report at:</b>
a) An outline of the contents, main objectives of the plan or programme and relationships with other relevant plans and programmes.	<b>Section 1 and 5</b>
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme	<b>Scoping report Section 6</b>
c) The environmental characteristics of areas likely to be significantly affected.	<b>Scoping report Section 6</b>
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC.	<b>Scoping report Section 6</b>
e) The environmental protection objectives, established at international, community or national level which are relevant to the plan or programme and the way those objectives and any environmental considerations have been taken into account during its preparation.	<b>Section 5</b>
f) The likely significant effects on the environment, including on issues such as: biodiversity; population; human health; fauna; flora; soil; water; air; climatic factors; material assets; cultural heritage, including architectural and archaeological heritage; landscape; and the interrelationship between the above factors. These effects should include secondary, cumulative, synergistic, short, medium and long term, permanent and temporary, positive and negative	<b>Section 8, 9 and 10 Appendix 1 Appendix 4</b>
g) The measures envisaged to prevent, reduce and, as fully as possible, offset any significant adverse effects on the environment of implementing the plan or programme.	<b>Section 11 Appendix 4</b>
h) An outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken, including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information.	<b>Section 7 (previous SA reports)</b>
i) A description of measures envisaged concerning monitoring in accordance with Article 10.	<b>Section 14</b>
j) A non-technical summary of the information provided under the above headings.	<b>Non-technical summary</b>
Taking the environmental report and the results of the consultations into account in decision-making (Art. 8).	<b>Change Log – Separate Document</b>

## 4 Other plans and strategies informing the Sustainability Appraisal

- 4.1 It is the nature of local planning that there exists additional and overlapping policy and legislative requirements at national and local levels that must be taken into account as part of plan making. The Local Development Plan (LDP) will aim to not just implement local policy objectives but deliver land use policy for Wales as well as take account the policies from national agencies and partner organisations.
- 4.2 Many other documents prepared by the local authority and others provide context for the LDP – in the form of objectives that the LDP should help to meet, or complementary material in the form of policies and programmes.
- 4.3 In addition to local level plans and strategies a large amount of guidance on development planning comes from the Wales level, in the form of Planning Policy Wales and the Technical Advice Notes (TANs), published by the Welsh Government.
- 4.4 It is important for the LDP and the sustainability appraisal (SA) alike to take on board the messages from these documents in order to ensure that a unified approach is taken to the development of the plan area. For the SA, the way that these can be best taken into account in the appraisal process is by ensuring there are relevant objectives in the sustainability framework for each matter.
- 4.5 The rest of this section sets out many of the main plans and guidance that will have relevance to the preparation of the LDP to the extent of considering what sustainable development objectives have been set and how these may be met through the LDP.
- 4.6 It is important to acknowledge that many other documents, guidance notes and policies are for the LDP rather than the SA to take into account. There is no need to repeat high level plans and documents that are already integrated into lower tiers of plan and strategy. Focus needs to be on identifying those documents that really add to the understanding of sustainability in Bridgend and the areas where impacts of the plan could be appraised. There is an overarching need to keep the collection of plans and strategies to a reasonable level of detail to make the process manageable and makes the SA better.

### **International policy**

- 4.7 The SA takes into account policies set at an international level, both those set by the United Nations, such as the Kyoto Protocol, 1992 on climate change and the need to limit greenhouse gas emissions, as well as the environmental legislation from the European Commission, outlined below.
- 4.8 The EC Council Directive on the Conservation of Natural Habitats and of Wild Flora and Fauna 92/43/EEC – considers the conservation of flora and fauna and on a network of protected areas in Europe, including special protection areas.

- 4.9 The Water Framework Directive 2000/60/EC – considers sustainable water use and water quality protection in river catchments. The Environment Agency has a duty to prepare River Basin Management Plans (in consultation and liaison with various stakeholders) to implement the Directive. Bridgend County Borough falls within the ‘Western Wales River Basin District’ (RBD) the management plan for which was adopted in December 2009.
- 4.10 The Air Quality Framework Directive 92/62/EC – seeks to control air pollution.
- 4.11 Various waste management Directives including the Landfill Directive 99/31/EC – seek the more sustainable management of waste, including setting targets for recycling rates of waste, with implications for general waste management policies.

### **United Kingdom Government Policies**

- 4.12 The United Kingdom ‘Biodiversity Action Plan’ (1994) is the overall action plan for habitat and species protection in the UK. This has now been largely replaced by the Wales Biodiversity Framework, March 2010. There is also a Bridgend Local Biodiversity Action Plan. In addition, the pre existing Development Plan and Supplementary Planning Guidance (SPG) can provide a reciprocal role in informing SA of the new LDP.
- 4.13 The United Kingdom ‘Waste Strategy’ (2000) sets a vision for the approach to waste management in the UK, including targets for reducing industrial and commercial waste to landfill to 85% of 1998 levels by 2005, and recycling 30% of household waste by 2010. Therefore the LDP needs to ensure that it promotes the more efficient use of resources.
- 4.14 The ‘Air Quality Strategy for England, Scotland, Wales and Northern Ireland’ (2000), includes the need to improve air quality, and sets specific targets for this.
- 4.15 ‘A Better Quality of Life; A strategy for sustainable development in the United Kingdom’ (1999) and the updated strategy ‘Securing the Future’ (2005) set out the UK wide sustainable development agenda.
- 4.16 There are many other UK and international legislation and documents that support more sustainable development and on the protection of the natural environment. However, many of these are plans and programmes are interpreted through Wales, regional and local policy to ensure that they are implemented. For instance, European wildlife and landscape protection legislation is interpreted into planning policy, so covered in the plan. In these instances it is not necessary to repeat the content of these higher tier policies; as those at a lower tier can be more useful in identifying specifics that the sustainability appraisal should address in the County Borough.

### **Welsh Government policies and strategies**

- 4.17 The key documents are ‘Planning Policy Wales and Minerals Planning Policy Wales which outline the principles and aspirations for planning and mineral planning policies of the Welsh Government (WG)’. The promotion of sustainable development is a central consideration of both documents.

- 4.18 The way that the land use planning system can be used to contribute to achieving the above, and WG's other strategic objectives with respect to the economy, overcoming social disadvantage, and seeking equal opportunities is set out in thematic sections in Planning Policy Wales. Sustainable development is therefore a key priority for the policies of the LDP.
- 4.19 Planning Policy Wales (Edition 5, November 2012) contains the current land use planning policy for Wales. It provides the policy framework for the effective preparation of local planning authorities' development plans. The documents sets out the Welsh Ministers commitment to delivering sustainable development. Sustainable development is defined as; '*enhancing the economic, social and environmental well-being of people and communities and achieving a better quality of life for our won and future generations*'. This needs to be achieved through promoting social justice and equality of opportunity and enhancing the natural and cultural environment within its limits, using only a fair share of the earth's resources.
- 4.20 The 'Wales Spatial Plan' (November 2004, updated 2008) is the national spatial plan for Wales. Bridgend falls in the transitional zone between South East Wales, 'the Capital Network', which is Wales' most populous region, and the Swansea Bay area. For most planning purposes Bridgend relates to the South East Wales regional area. This area is characterised by major economic and social disparities. As the main economic driver of Wales the emphasis is on creating a coherent urban network where all of Wales is able to benefit from its prosperity.
- 4.21 The Spatial Plan identifies Bridgend as a main 'Cross-Boundary Settlement' with links to the Cardiff area as well as towards the west to the Swansea Bay City region, where it is also identified as a 'hub' settlement. Maesteg, Pyle and Porthcawl are also identified as Primary Key Settlements of the Swansea Bay region, with the latter two identified as 'hub' settlements, critical to the success of the region.
- 4.22 The Wales sustainable development scheme '*One Wales: One Planet*' (May 2009) identifies ways in which planning can help deliver the Wales sustainability vision. The planning system is a principle way to achieve more sustainable resource use. The aim is to provide for homes, infrastructure, investment and jobs in a way that helps reduce the ecological footprint. The scheme identifies issues such as reducing carbon use in new buildings, allowing renewable energy generation and reducing travel demand.
- 4.23 The Welsh Assembly Government's Environmental Strategy (2005) updated by a revised Action Plan 2008-2011 outlines a comprehensive strategy for the protection of the environment, achieved through other plans and strategies. This is currently under review with the preparation of a revised strategy underway. However, the LDP will be expected to comply with the strategy as it attempts to protect and conserve Wales' unique habitats and landscapes and considering climate change. The Action Plan contains a number of 'outcomes' for the environment in Wales, most relevant to the LDP and SA are:
- Outcome 3. Environment considerations are integrated into all policies programmes and service delivery and that high quality and consistent environmental evidence is available to inform the decision making process.

- Outcome 7. Wales' greenhouse gas emissions are minimised, consistent with Wales contributing fully to meeting UK-wide targets and in line with more specific Wales targets.
- Outcome 8. Wales has improved resilience to the impacts climate change.
- Outcome 11. Appropriate waste management facilities are in place to minimise the amount of waste going to landfill.
- Outcome 13. Water resources are managed sustainably meeting the needs of society without causing damage to the environment.
- Outcome 16. Soil is managed to safeguard its ability to support plants and animals, store carbon and provide important ecosystem services.
- Outcome 17. The extraction of minerals and aggregates minimises the impact on the environment and local communities.
- Outcome 20. The wider environment is more favourable to biodiversity through appropriate management, reduced habitat fragmentation and increased extent and interconnectivity of habitats.
- Outcome 23. The quality and diversity of the natural and historic character of our landscape and seascape is maintained and enhanced.
- Outcome 24. The built environment is high quality and vibrant, reflecting local distinctiveness and supporting strong communities, which are actively engaged in the management of their local environment.
- Outcome 25. New buildings in Wales meet high environmental quality standards and the environmental quality standards of existing building stock is improving.
- Outcome 26. The historic building stock and character is maintained to a high standard.
- Outcome 27. There is easy, equitable access to ample high quality green space.
- Outcome 28. Environmental nuisances such as...noise pollution and light pollution are minimised.
- Outcome 30. The number of people choosing to walk or cycle as a means of transport is increasing.
- Outcome 31. Appropriate measures are in place to manage the risk of flooding from rivers and the sea and help adapt to climate change impacts.
- Outcome 33. A reduction in air pollution leads to increased life expectancy and ecological protection.
- Outcome 34. The extent of contaminated land is better understood and actions are being taken to remediate contaminated land for beneficial use where appropriate.
- Outcome 35. The quality of out groundwater, rivers, lakes and coastal waters is maintained and enhanced.

4.24 The *Climate Change Strategy for Wales* (WAG October 2010) sets the strategy for helping reduce and adapt to a changing climate in Wales. Spatial planning is identified as one of the ways in which this can be achieved. The strategy states that '*ensuring that land use and spatial planning promote sustainable development and*

*enable a move towards a low carbon economy which takes account of climate impacts.* Planning will also have a major role to play in adaptation, for instance to avoid flood impacts and protect wildlife movement routes, and also to deliver development that makes better use of carbon resources. Planning policy will also have to play a role in reaching specific targets, such as the 20% reduction in greenhouse gas emissions in Wales.

4.25 Planning Policy Wales is supported by guidance notes in the form of Technical Advice Notes (TANs) which have been referred to in order to inform the SA of the LDP. However, TANs with particular inference to the SA process are set out below.

- Technical Advice Note 1 – Joint Housing Land Availability Studies (2006), which provides guidance on the preparation of annual studies, the purpose of which is to monitor market and affordable housing to ensure that sufficient land is genuinely available to provide a 5 year supply of housing.
- Technical Advice Note 2: Planning and Affordable Housing (2006). This provides practical guidance on the role of the planning system in delivering affordable housing, stressing the need for planning and housing authorities to work together in participation with stakeholders to undertake local housing assessments. The Guidance requires Local Planning Authorities to identify an affordable housing target, indicate how that will be achieved and monitor its provisions taking action where necessary to ensure the target is met.
- Technical Advice Note 4: Retailing and Town Centres, (1996). This offers practical advice on policy formulation for town centres and retail including, needs assessments, general principles and car parking standards.
- Technical Advice Note 5: Nature Conservation and Planning, (2009). This give advice on how planning policy should help incorporate wildlife features into the design of development and green infrastructure. It gives detailed advice on protection and designation of international, national and locally designated nature conservation sites. It also covers protection and enhancement of natural habitat links and wildlife corridors, and the implications of climate change on biodiversity. The TAN also covers the relationship of statutory protection measures for biodiversity with planning. (TAN5 2009 replaces TAN5 2006 that was in place at the start of the SA process)
- Technical Advice Note 6, Planning for Sustainable Rural Communities (2010). This outlines policy and guidance on rural, specifically agricultural and rural economic affairs. The TAN includes guidance on farm development and diversification, the re-use and conversion of rural buildings, forestry and development involving horses.
- Technical Advice Note 8, Renewable Energy (2005). This has specific land use implications for all forms of development of renewable energy sources including those for onshore wind energy.
- Technical Advice Note 12, Design, (2009). The purpose of this TAN is to provide guidance on how sustainability can be promoted through good design and facilitated through the planning system. It also sets out the details of how design and access statements need to be prepared for proposed development. There is a much greater emphasis on sustainable design in this note compared to the previous TAN12 2002 that was in place at the start of plan making and SA preparation.

- Technical Advice Note 13, Tourism, (1997). This encourages good planning with regard to tourism and the promotion of sustainable tourism.
- Technical Advice Note 14, Coastal Development, (1998). This encourages well designed, and sustainable development where appropriate on the coast and in coastal areas.
- Technical Advice Note 15, Development and Flood Risk, (2004). This provides Guidance to authorities regarding development and flooding, including the need to consider the effects of Climate Change and the use of Flood Risk maps.
- Technical Advice Note 16 Sport, Recreation and Open Space (2009). This TAN contains details related to accessible open space and sport facilities, with details of how these can be delivered by the planners.
- Technical Advice Note 18, Transport, (2007). This TAN gives guidance on integrating land use planning and the development of transport infrastructure to help address the environmental impacts of transport. This includes more resource and travel efficient settlement patterns; ensuring new development is located where there is good access by public transport, walking and cycling, minimising travel need and fostering social inclusion; managing parking provision; provision for pedestrians; multi-purpose trip destinations; use of rail and sea freight; good quality design of streets; and supporting existing transport networks. (TAN18 2007 replaces TAN18 1998)
- Technical Advice Note 20, The Welsh Language - Unitary Development Plans and Planning Control, (2000), encourages planning authorities to fully take account of the effects of Plans on the Welsh Language, specifically advertising and other controls.
- Technical Advice Note 21, Waste (2001). This is intended to facilitate the introduction of a comprehensive, integrated and sustainable land use planning framework for waste management in Wales.
- Technical Advice Note 22, Sustainable Buildings (2010). This contains details to help local planning authorities to help implement national planning policies on sustainable construction. This includes guidance on sustainable building standards, design solutions and low carbon development.
- Minerals Technical Advice Note (MTAN)1: Aggregates (2004)
- Minerals Technical Advice Note (MTAN)2: Coal (2009).

4.26 The *Coastal Tourism Strategy* (September 2008) sets out the aims for coastal tourism throughout Wales. These aim to see tourism in coastal locations strengthened. This could have potential benefits for the plan area by supporting the economy of coastal towns, but if not managed well could have adverse impacts on coastal environments from extra visitor pressure.

4.27 Specifically Porthcawl is identified as one of Wales' *coastal resorts*. In these resorts tourism economy must remain a major focus, but other economic improvements are necessary to improve local employment. where the local economy is dominated by tourism and this will need to remain as a major focus for the town. The potential for the economy to grow its economy related water sports and particularly surfing is identified, as well as a location that could benefit from a new or extended marina.

- 4.28 In April 2010 the Welsh Government published their housing strategy; *Improving Lives and Communities: Homes in Wales*. This sets priority actions for delivering good quality homes in Wales. These include increasing the number of affordable homes available, especially in rural areas. Also, the strategy identifies the need to make best use of investment in housing and other regeneration activity to create more jobs and training opportunities, and to improve the look and feel of communities and the services available for local people.
- 4.29 *Economic Renewal: a new direction* (July 2010) set the economic strategy for Wales. This has five priorities for delivering the vision of economic stability and growth. Relevant priorities are:
- Investing in high quality and sustainable infrastructure
  - Making Wales a more attractive place to do business, which includes the attractiveness of the place
  - Broadening and deepening the skills base.
- 4.30 The National Transport Plan for Wales 2010 contains a number of infrastructure delivery projects in the Bridgend plan area as well as a general intention to improve public transport accessibility in Wales, in addition to road building schemes. There are physical transport infrastructure schemes proposed for the County Borough in the most recent transport plan.
- 4.31 The Water Resource Strategy for Wales, *Water is precious* (June 2009) sets out the a plan for the future of water resources in Wales. This considers how availability and use of water will change. It includes consideration of the impact of climate change on water resources. This addresses the need for development to be designed to use water more efficiently and ensure the infrastructure is in place to cope with changing supply and demand. This also looks at the relation of water use in development to protecting natural habitats reliant on water supply.

#### **Local and Regional Policy**

- 4.32 There are several other Local and Regional Plans and Strategies which will influence the preparation of the LDP. Those referred to below are not intended to be a complete list of plans, or a definitive account of their contents. Rather, it is intended to indicate those areas of Plans and Strategies upon which SA of the LDP will principally focus. Other Plans and Strategies or their revisions may also arise during the preparation of the LDP.
- 4.33 As a strategic issue, TAN 21 introduced 3 regional waste areas for Wales. Bridgend is located in the South West Wales region with, Swansea, Carmarthenshire, Pembrokeshire, Ceredigion and the Pembrokeshire Coast, Brecon Beacons National Park and Neath Port Talbot.
- 4.34 These authorities produced a Regional Waste Plan (2003), one its aims is to provide a land use-planning framework to enable individual authorities in the region to allocate sites in their development plans for new waste management facilities. This was revised in 2008 with the first review published. This review identifies that there is an indicative capacity for the County Borough for waste between 185 and 220 thousand tonnes, in around 3 or 4 new sites over the plan period. Each authority of

the regional waste area has to identify sites to accommodate the waste arising needs on a regional rather than local basis. The plan identifies preferred areas of search for the waste.

- 4.35 Neath Port Talbot, is the authority to the north and west of the County Borough. The Neath Port Talbot UDP was adopted in March 2008. The plan makes an effort to separate the two boroughs and retain their distinctiveness through Green Wedge policies in the south west of the County Borough where the developed area of Bridgend abuts. In the more rural north east of the County Borough, rural development policies protect the area from development. Neath Port Talbot has suffered from population loss over a period of years. The Strategic aims of the LDP are to halt this trend and encourage regeneration and development within town and village centres. Bridgend must take account of these aims and ensure it supports the aims of neighbouring authorities, for example through restricting development in certain places.
- 4.36 The Neath Port Talbot plan is currently at a Pre Deposit preparation stage and is attempting to find sufficient sites to accommodate the housing needs of communities in the Borough.
- 4.37 The Vale of Glamorgan has an adopted UDP (1996) and is preparing for LDP. The Vale is an area of high quality farmland and attractive townscapes. The area also has a number of tourist attractions. The UDP concentrates on maintaining and enhancing the Vale's landscape and townscape and concentrating on improving pockets of deprivation. The LDP has reached a preferred strategy stage and the key diagram shows that there are no plans for large scale new development to take place immediately adjacent to the County Borough boundary. The nearest 'primary settlement' is Cowbridge, but the majority of growth is anticipated in the south east of the plan area, in close proximity to Cardiff.
- 4.38 Rhondda Cynon Taf, borders Bridgend to the east. The authority has an adopted LDP in place. The built up areas of the RCT are in close proximity to those of Bridgend County Borough. For example part of the employment area allocates to the east of Pencoed are in RCT, and Pencoed and Bryncae are closely linked along the A473. Evanstown is more closely linked to the villages of Gilfach Goch and Hendreforgan in RCT than areas within Bridgend County Borough, with change anticipated in the area through large housing allocations allocated between Hendreforgan and Bryngolau.
- 4.39 All three authorities are responsible for public transport and highways in their respective areas. However, the strategic transport plan for south east Wales is prepared jointly by the ten local authorities of the region. The Sewta Regional Transport Plan (2008) considers the strategic transport framework, and implementation programme and actions for a five year programme of transport improvements and a monitoring and review mechanism. The transport objectives for the Sewta are:
- To improve access for all to services, facilities and employment, particularly by walking, cycling and public transport.
  - To increase the proportions of trips undertaken by walking, cycling and public transport.

- To minimise demand on the transport system.
  - To develop an efficient, safe and reliable transport system, with improved transport links between the 14 key settlements in South East Wales, and between South East Wales and to the rest of Wales, the UK and Europe.
  - To provide a transport system that encourages healthy and active lifestyles.
  - To reduce significantly the emission of greenhouse gases and the impact of the transport system on local communities.
  - To ensure developments are accessible by sustainable transport and to make sustainable transport and travel planning an integral component of regeneration schemes.
  - To make better use of the existing transport system.
- 4.40 The plan includes specific transport schemes to help deliver the objectives. These include walking/cycling routes, public transport as well as new road schemes.
- 4.41 One of the most important documents to be considered in LDP preparation and its SA is the **Community Strategy**. This has now been replaced (in mid 2013) by the Single Integrated Partnership Plan for Bridgend. However, it was the former Community Strategy and its predecessor that largely influenced the LDP. The Bridgend Community Strategy was produced through the Bridgend Local Strategic Partnership and provided an overarching framework for all other strategies in the County Borough, including the Local Development Plan.
- 4.42 The previous Community Strategy vision for Bridgend was,  
*“By working together we will realise the vision for Bridgend: a bright future that celebrates and builds on the successes of our past and present”.*
- 4.43 The Strategy was divided into six key themes; strong communities, young voices, healthy living, new opportunities, proud past and green spaces.
- 4.44 Although most of the aims and sub-objectives of the Community Strategy, *Bright Future – a community strategy for Bridgend County 2009-2012*, bore some relationship with the aims of sustainability, some had specific references to the LDP and sustainability issues. In this respect, these six key themes were:
- Strong communities: The strength of our communities underpins Bridgend County. We will protect, preserve and promote the areas in which we live, work and play and enhance every resident’s sense of safety, citizenship and belonging.
  - Young voices: We want all our children and young people to thrive and make the best of their talents; live healthy and safe lives; be confident and caring individuals throughout their lives and know and receive their rights.
  - Healthy living: The physical and mental wellbeing of our residents is vital for them to enjoy a happy and healthy future. We will support individuals, employers and key services to achieve healthier, active and positive lifestyles and a greater quality of life for all.
  - New opportunities: Our bright future depends on skilled and reliable employees which businesses can feel confident in. We will build on our place in the

knowledge economy by developing our workforce, enhancing our skills base and supporting local companies.

- Proud past: We value our heritage and history of working together. We will celebrate our past and learn from our experiences to steer us towards a bright future.
- Green spaces: The quality of our environment is an asset, that brings benefits to all who live, work and visit our communities. We will value, promote, sustain and protect our natural, rural and built environment for the future.

4.45 This community strategy replaced a previous version that was in place when the LDP preparation and original SA work was undertaken. Therefore, this earlier strategy has had an influence on the LDP and SA. This earlier community strategy also had objectives relating to the role of the LDP in achieving the strategies aim. These objectives are:

- quality of life; the plan should be expected to improve the overall quality of life for people in the County Borough through improvements to the built and semi natural environment and detailed design and layout of developments
- the environment; the LDP can help to protect and enhance the built and natural environment. The Plan will also have a role to play in increasing the amount of waste that is recycled, Also it can assist in creating a higher proportion of energy from sustainable sources.
- prosperity; the LDP can help to create a mix of employment sites in good and accessible locations as well as protect existing employment sites from higher value land uses. Through its policies the Plan can also help to secure new infrastructure investment opportunities.
- safer communities; through its policies the LDP can encourage good design of new developments and improvements of existing ones, reduce crime and fear of crime, as well as aim to reduce the potential for accidents.
- health; the LDP can encourage sport and activity through promotion and protection of open space. The Plan also has an essential role to play in providing affordable housing and providing opportunities for enhanced health care provision.
- inclusion; a specific way in which the LDP could contribute to this objective is through ensuring a good mix and sufficient amount of housing of all tenures and types. A mix of tenures and sizes in new development should be sought and accessibility for all considered.

4.46 The approved **Bridgend Sustainable Economic Regeneration Strategy (2003)** sets out the long term aims and objectives for the economic development of the County Borough in the form of a 10 – 15 year agenda. It is accompanied by a three year Action Plan. It focuses on an ‘ambitious and innovative’ vision for the County Borough providing fresh direction for inward investment within the context of the Wales Spatial Plan. It incorporates a ‘Sustainability Index’ against which projects and proposals are evaluated.

4.47 A regeneration strategy was also prepared in 2008 for the County Borough. **Fit for the Future: Bridgend County Borough’s Regeneration Strategy 2008-2021**

**(2008)** seeks to promote entrepreneurial and wealth creating activities, emphasising the key actions to prepare for, take and maximise opportunities for local people and businesses and attract new investment. The plan sets priority actions, partners and plans to help deliver regeneration, this includes the LDP. The strategy is based around four strategic aims. The aims are:

- Enabling wealth and creating enterprise
- Driving up skills levels in an active labour force
- Making a great place to live, work, visit and play
- Strengthening and renewing infrastructure.

4.48 **The Local Housing Strategy** has a number of key priorities which include improving the condition, suitability and energy efficiency of existing housing; making use of vacant properties, preventing and reducing homelessness; providing affordable housing and meeting the needs of people with special housing requirements and engaging in community regeneration.

4.49 **The Health Social Care and Wellbeing Strategy**, which is jointly prepared by Housing and Community Well-being and the Local Health Board, as a means of identifying and addressing unmet health, social care and well-being needs.

4.50 The approved **Bridgend County Tourism Strategy** provides an agreed strategic framework that reflects the views of the tourism industry, and aims to develop, co-ordinate and manage tourism in order to maximise its benefits to the local economy whilst minimising any adverse effects on local communities and the environment.

4.51 Bridgend County Borough Council has an approved '**Local Biodiversity Action Plan**' (LBAP). The plan outlines important baseline information for biodiversity in the area and how areas of high biodiversity value are to be protected and improved.

4.52 The LBAP for Bridgend has a number of direct implications for the LDP and is a major consideration for the SA. The main land use implications of which are protecting and where possible enhancing biodiversity through development and addressing the demand for development whilst protecting biodiversity.

4.53 **The Bridgend County Borough Council Single Education Plan**. This identifies the Council's priorities, strategies and targets for its education provision for the ensuring 2 years. It succeeds earlier strategies and seeks to integrate with the former School Organisation Plan, Early Years Development Plan and Behaviour Support Plan. It should have relevance in this respect to the SA of the LDP, and to the plan proposals themselves.

4.54 The '**Countryside Strategy for Bridgend (2002)** This provides a strategic framework for the sustainable development and management of countryside and urban green spaces in the County Borough. It outlines a number of objectives and principles which the LDP should consider when it deals with the countryside and urban green space issues.

4.55 The **Lavernock Point to St Ann's Head Shoreline Management Plan (SMP2)** (draft 2010) will have implications for how the coast of the County Borough will be managed in the future. The plan sets out the planned approach to flood/sea

defences along the south Wales coast from Lavernock Point to St Ann's Head. This includes nine stretches in and adjacent to Bridgend County Borough coast. The Plan sets out the management policy for the immediate, medium and long-term. There is to be a change of policy at Newton, where currently defences are used to 'hold the line', in the long term this intended to move to 'no active intervention', to allow the natural movement of sediment. This may change the characteristics of land behind these defences in the longer term.

- 4.56 The **South East Wales Transport Alliance Regional Transport Plan** was finalised in December 2008 and set the transport strategy for the region that includes Bridgend County Borough. The vision for the plan is:

*A modern, accessible, integrated and sustainable transport system for South East Wales which increases opportunity, promotes prosperity for all and protects the environment; where walking, cycling, public transport, and sustainable freight provide real travel alternatives.*

- 4.57 The plan includes specific schemes to help deliver the vision, including new walking & cycling proposals, rail proposals, bus proposals, better transport integration, as well as road schemes.

## 5 Sustainability issues to be addressed in the LDP area

### Introduction

- 5.1 This section of the report is a summary of the key sustainability issues in Bridgend County Borough and how the LDP could help to address them. The information is drawn from a review of the baseline characteristics of the plan area as part of the Sustainability Appraisal (SA) as required by the SEA Directive. It was completed as a separate exercise from the identification of issues in the introductory sections of the LDP, specifically for the sustainability appraisal.
- 5.2 The full text of the baseline characterisation is shown in the scoping report for the SA, available on the Council's website.

### Landscape

- 5.3 The Unitary Development Plan for Bridgend describes countryside as 'that area of land lying outside the designated settlement boundaries'. Within Bridgend County Borough this covers an area of varied landscape ranging from the exposed tops of the coalfield plateau, through upland and lowland valley landscapes and coastal plateau which includes coastal dunes, to the Glamorgan Heritage coastline. This is interspersed with woodlands, moorlands and river valleys and constitutes a rich natural and semi-natural environment.
- 5.4 The Glamorgan Heritage Coastline is the only nationally designated landscape in the County Borough based on scenic beauty alone. There are many elements that make up the distinctive landscapes of the County Borough, and key features to consider are:
- dark night skies and the impacts of light pollution
  - traditional field systems
  - woodland and trees
  - urbanisation of rural areas
  - tranquillity
  - common land
  - urban fringe areas
- 5.5 The landscape quality of the County Borough should be maintained and where possible enhanced through the LDP. Features in the landscape that have been identified as part of Landmap characterisation, and other processes, that contribute to the distinctive local character should be protected wherever they appear.
- 5.6 The highest level of protection should be afforded to the Glamorgan Heritage Coast, the 'Landscape Conservation Areas' and 'Special Landscape Areas' should also be preserved, taking into account the key features of these landscapes, and character assessment using Landmap techniques.

## **Biodiversity**

- 5.7 The plan area contains several sites of international importance for nature conservation. These have statutory protection from harm under European legislation and it will need to be shown that the LDP will not have any significant adverse impacts on the integrity of these sites.
- 5.8 Sites of national and local biodiversity importance must be protected from harm. The Habitats Regulations Screening report that has been completed of the plan identifies where there may be a risk of harm to these sites. Subject a precautionary approach adopted through policy the screening identifies significant adverse impacts are unlikely.
- 5.9 Development plans should ensure that certain species and habitats are protected from harmful development, and this includes secondary impacts, such as the need for water abstraction, pollution from development or habitat fragmentation.
- 5.10 Where appropriate all new development should help enhance the biodiversity resource in the Plan area, through native species landscaping, appropriate location, and open space management.
- 5.11 It will also be important for the LDP to recognise the importance of protecting geodiversity assets, such as the Kenfig and Merthyr Mawr Burrows.

## **Land**

- 5.12 It is also important to consider the soil assets of the County Borough. The soil resource is essential for sustainable agricultural in the United Kingdom. Given the upland character of much of the County Borough there is particular importance in protecting higher quality soils where they exist.
- 5.13 There will also be the need help bring contaminated soil back into good use. This should included appropriate remediation of land through managing development.
- 5.14 Certain soil assets types will also be essential in the continued survival of some habitat types in the County Borough. Therefore, consideration needs to be given to protecting the continued functioning of soil to protect rare and vulnerable habitat types.

## **Climate change**

- 5.15 Development in the County Borough can help in mitigating against climate change, by reducing carbon emissions into the atmosphere and avoiding the loss of carbon sinks. This can be achieved through:
- use of lower carbon heat and power
  - more energy efficient buildings
  - protecting carbon sinks, such as woodland
  - reducing the need to travel and increasing the proportion of people using more sustainable transport types.

- 5.16 New development must be able to adapt to a changing climate. This includes avoiding flood risk areas (fluvial and tidal), taking into account the increased risk from climate change and sea level rise. New buildings need to be designed to meet the needs of changing seasonal weather will also be important, as increased summer temperatures and heavier winter rain will impact on the design of buildings and drainage systems.
- 5.17 Habitats also need to be protected to help wildlife adapt to a changing climate, this will include conserving movement pathways such as hedges and embankments and 'stepping-stone' features such as ponds and mature trees.

### **Water**

- 5.18 Generally water quality in and around the Plan area is good, although at risk in places, and this must be maintained and where necessary improved. To protect water quality capacity in water treatment infrastructure needs to be properly phased into development and in most instances this needs to be complete by the time development commences and definitely before completion. Water runoff also needs to be managed to avoid adverse impacts.
- 5.19 Water should be used efficiently in new development.

### **Flood**

- 5.20 Risks of flood are likely to increase along with climate change. Therefore it is important that developing on the flood plain, and in flood risk area, is prevented in line with TAN15, and wherever possible sustainable drainage systems are implemented for rain water management.
- 5.21 New development, must ensure that it is protected from flooding, and not located so as to exacerbate flood risk to others. There is also a risk from tidal inundation in coastal and estuary locations, although at present coastal defences stop this climate change and sea level rise could act together to increase risk of 'over-topping' of these defences causing flooding.

### **Air**

- 5.22 There is relatively good air quality of the County Borough, with no identified Air Quality Management Areas. However, several areas have quite high concentrations of small particulate matter (PM<sub>10</sub>), which can have respiratory impacts and impacts on wildlife. This includes the urban area of Bridgend to the southern boundary of the County Borough, around and to the north of Pencoed and on the A4060 near Llangynwyd. Neighbourhoods near the A473 Brackla / Coychurch are also identified as suffering from poor air quality in the Wales Index of Multiple Deprivation, as are, North Cornelly communities adjacent to the M4.
- 5.23 One of the greatest impacts on air quality is car, van and HGV exhaust fumes. Therefore, there is need to help reduce this type of travel.
- 5.24 The LDP will need to ensure polluting development does not occur near sensitive receptors such as residential neighbourhoods, schools, hospitals and some habitat types.

## **Transport**

- 5.25 The County Borough has good strategic transport links, with the M4 running through the area and mainline east-west rail links.
- 5.26 Car travel makes up by far the greatest percentage of commuting trips, to help achieve environmental sustainability this must be reduced. Integrated transport, bus links and improvements walking and cycling routes and more mixed use development can all help in reducing car travel.

## **Historic heritage**

- 5.27 There are many areas of historic interest in the County Borough, including 15 Conservation Areas 316 listed buildings (8 of which are of the Grade I standard). There are also historic parks and gardens and landscapes identified in the County Borough.
- 5.28 The plan needs to help maintain and enhance natural and semi-natural assets, but also the man-made features/areas of urban green spaces. The interconnection between nature conservation, landscape protection and historic heritage should be recognised, and is reflected in the preservation of historic landscapes and features.

## **Open space**

- 5.29 The identified low level of open space in many parts of the County Borough may mean that intensification of residential development in these locations will result in a drop in the availability of park space per person. The LDP must not only protect existing open space and rights of way but encourage extra provision as part of any development above an appropriate size, to make sure new residents have accessible open space. Provision of open spaces needs to take into account the results of any review undertaken during LDP preparation.

## **Minerals**

- 5.30 Development in the Bridgend Country Borough needs to take into account the considerable landbank of minerals and rock in the area. Development should be appropriately located so as not to sterilise these resources. The plan should ensure that any new applications for mineral mines or quarries have policies in place to avoid adverse environmental and social impacts.

## **Waste**

- 5.31 It is important that the Bridgend LDP takes into account the future waste management needs of the wider South West Wales region, as identified in the regional waste plan. There is a need for the County Borough to help meet the regional demand for waste treatment in the Regional Waste Plan, rather than local needs only.
- 5.32 The LDP will need to show a good understanding of these requirements, and ideally could identify suitable sites through allocations in the plan, this will enable stakeholders including the public to better comment on any proposals at a strategic level. The local authority will need to play its part in achieving the Welsh Assembly Government zero waste target of the 'Towards Zero Waste'..

### **Population and housing growth**

- 5.33 The LDP has a significant role in housing provision, as the Council is charged with setting the housing provision for the plan period, as well as allocating suitable sites to deliver much of this provision. Planning to deliver sufficient housing to meet the future needs of the local residents is essential. This is coupled with ensuring housing comes forward at an appropriate rate to support the economy of the area, and in suitable locations to support a sustainable spatial strategy and reducing the need to travel. The LDP must also work to ensure the right type of housing is built to deliver housing to meet all identified needs especially those least able to afford it.
- 5.34 The Plan should give clear definition on what the authority considers to be affordable in the plan area in terms of relationship between local income levels and house prices or rents for different types of households. With a suitable affordable housing target set for new sites. The LDP will need to consider how to reverse the pockets of deprivation throughout the County Borough, and help ensure equitable access to decent housing, jobs and services for all.

### **Health and disparities**

- 5.35 The Welsh Health Survey 2008/9 shows Bridgend County Borough has one of the higher obesity rates for Wales. Observed data shows a quarter of women are obese and 24% of men, compared to the Wales averages of 21%. When including the proportion of people overweight as well as obese, the gap rises with Bridgend being 5% greater than the Wales averages.
- 5.36 The planning system can help deliver development that helps people make healthy lifestyle choices. For instance, the LDP can deliver accessible jobs, shops and services linked by high quality pedestrian or cycling routes, helping people choose to walk rather than drive. The LDP can help improve access to open space for recreation and space for growing food. The LDP can also help ensure people have access to health services.
- 5.37 New development should be located to avoid adverse health impacts of hazardous or polluting development.

### **Employment**

- 5.38 The plan must ensure that it works in order to encourage higher levels of economic growth, ensuring new jobs are provided to meet the skills of the local workforce as well as helping to improving qualifications and skills of the resident workforce.
- 5.39 The Plan should support growing business sectors, and seek to actively encourage the diversification of the economy so that it is less reliant on seasonal employment, this is especially important for rural and coastal areas.
- 5.40 There is currently a net out commuting from Bridgend, to help achieve sustainable development living and working patterns in Bridgend need to become more self-contained. Increasing the proportion of people who work close to the place where they live. The LDP should also aim to increase work and commuting trips made by sustainable modes of transport.

## **Tourism**

- 5.41 The LDP in partnership with other strategies for the area should help to increase the tourism visits and spend in Bridgend. Increasing the spend of tourists is the key to more sustainable tourism approach rather than a large increase in visitor numbers. Increased visitor numbers may have negative sustainability impacts, such as more visitor pressure on the environment and an increase in car travel.

## 6 The sustainability objectives

- 6.1 The objectives proposed for use in the sustainability appraisal (SA) were developed using those from the previous SA of the Unitary Development Plan (UDP) as a starting point. These have been adapted to indicate how they were relevant to the Local Development Plan (LDP) for Bridgend.
- 6.2 Part of the scoping exercise for the SA was to investigate the baseline sustainability characteristics of the County Borough. Identified from these are any sustainability issues that would need to be addressed in the area, including through implementation of the LDP. In addition to this, a review of plans and programmes that cover the County Borough was carried out at scoping. The purpose was to identify other objectives, or sustainability considerations that should be taken into account in the sustainability appraisal.
- 6.3 Therefore, taking into account other plans and strategies, as well as the baseline sustainability considerations identified at Scoping, enabled the sustainability objectives to be tailored to the appraisal of the LDP. The Scoping Report contains an explanation of this process, and full details of the baseline characteristics of other plans and programmes (see Scoping Report, December 2006 on the Bridgend County Borough Council website).
- 6.4 The sustainability objectives have their basis in a general consensus on what sustainable development means. This is based on an understanding of sustainability as:
- natural resources should be efficiently used so that future generations can meet their needs
  - equitable access to resources, where access to resources for some should not be denied by the actions of others, now and in the future.
- 6.5 To use such ideas in examining a land use or spatial plan, something more specific is needed. Therefore, a sustainability framework has been developed to establish a common and consistent definition of what it means to achieve greater sustainability in Bridgend, for SA. This uses national principles for sustainable development as well as taking into account of the objectives of local plans and programmes as identified in section 4.
- 6.6 This sustainability framework uses the four objectives of sustainable development from the UK Government original sustainable development strategy, '*A Better Quality of Life*' (May 1999), despite this strategy being superseded in 2005:
- social progress which recognises the needs of everyone
  - effective protection of the environment
  - prudent use of natural resources
  - maintenance of high and stable levels of economic growth and employment.
- 6.7 In May 2009 a Wales-wide sustainable development scheme was published, this is '*One Wales: One Planet*'. This scheme defines sustainable development for Wales:

*“In Wales, sustainable development means enhancing the economic, social and environmental wellbeing of people and communities, achieving a better quality of life for our own and future generations:*

- in ways which promote social justice and equality of opportunity; and
- in ways which enhance the natural and cultural environment and respect its limits using only our fair share of the earth’s resources and sustaining our cultural legacy.

*Sustainable development is the process by which we reach the goal of sustainability”*

6.8 This strategy falls under the UK’s shared sustainable development framework, *Our Future – different paths*’ (March, 2005). The strategy gives the purpose of sustainable development as a goal that:

*‘...will be pursued in an integrated way through a sustainable, innovative and productive economy that delivers high levels of employment, and a just society that promotes social inclusion, sustainable communities and personal well-being. This will be done in ways that protect and enhance the physical and natural environment, and use resources and energy as efficiently as possible’*

6.9 The Wales scheme ‘Securing the Future’ the new Sustainable Development Strategy sets out five guiding principles that will replace the four aims of the older strategy. The strategy defines sustainable development as:

- living within environmental limits
- ensuring a strong and healthy and just society
- achieving a sustainable economy
- promoting good governance
- using sound science responsibly.

6.10 The sustainability framework tries to identify those matters of environmental, economic and social capital that are basic to well being and which we want as much of, or more of, in the future. The sustainability framework identifies these basic elements together with what constitutes a better position for each element. It tries to be comprehensive whilst keeping the different items in the framework distinctive.

6.11 To make sure the assessment also meets the requirements of the SEA Regulations it is also necessary to make sure the objectives cover relevant environmental issues. The requirements of the SEA Regulations Wales (The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 SI 1656 (W. 170)) are that a plan is assessed for:

*“The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues including—*

- (a) biodiversity;*
- (b) population;*
- (c) human health;*
- (d) fauna;*
- (e) flora;*
- (f) soil;*

- (g) water;*
- (h) air;*
- (i) climatic factors;*
- (j) material assets;*
- (k) cultural heritage, including architectural and archaeological heritage;*
- (l) landscape; and*
- (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).”*

- 6.12 The sustainability objectives for the sustainability appraisal cover all these topics, although in a broader way than they are expressed in the SEA Regulations. Appendix 6 shows the relationship with of the sustainability objectives with the issues identified by the SEA regulations requiring assessment. The table in the appendix shows that many of the SEA issues cut across a number of sustainability objectives. However, all of the issues are covered by at least one objective. Also, social and economic objectives are to some extent also relate to the SEA regulations through the need to address the needs of the population and human health.
- 6.13 Ideally quantified indicators and targets would be included for the objectives. However, quantifying each of these objectives, and developing relevant indicators is a difficult process as the very nature of the majority of the content of a development plan would not enable change to be directly attributed to the influence of the plan or to be measured. Therefore, the SA is principally concerned with whether the direction of change that the Plan would be likely to bring, would be positive in achieving more sustainable development, rather than with attempting to quantify changes.
- 6.14 The objectives can be further developed to include indicators for monitoring, through combination with the proposed monitoring framework for the LDP. More information on monitoring is included in section 10 of this report.
- 6.15 The objectives presented in Table 6.1 take the form of a ‘headline’ sustainability for which an objective has been developed. This is followed by the objective itself, which sets out what the Plan should be trying to achieve in relation to sustainable development. These are each accompanied by a set of supporting objectives, these are examples of the ways the LDP may directly impact on the objectives, representing a move towards greater sustainability.
- 6.16 The objectives have a purpose of providing a systematic basis for the stages of sustainability appraisal. By comparing the proposed objectives, strategy, policy and allocations against this consistent definition it is possible to determine if the plan is likely to be making a contribution to greater sustainable development.
- 6.17 The framework was revised following consultation on the Pre-Deposit LDP to take into account the comments from stakeholders.

**Table 6.1: The sustainability objectives for Bridgend LDP**

<b>Concern</b>	<b>Objective</b>	<b>Supporting objectives</b>
<b>Social progress which recognises the needs of everyone</b>		
Accessibility	<b>To ensure an increase in accessibility to opportunities, transport and to all services and information in the County Borough.</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• promote sustainable transport infrastructure, and integrated transport approaches?</li> <li>• implement an access hierarchy, putting pedestrians at the top and car users at the bottom?</li> <li>• promote alternative modes of transport where feasible?</li> <li>• ensure all have access to essential facilities and services, by a variety of modes of transport?</li> <li>• reduce reliance on the car for transport?</li> <li>• reduce existing disparities to access to services, decent homes and jobs?</li> </ul>
Housing	<b>To provide the opportunity for people to meet their housing needs</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• help meet the housing requirements of the area in ways which help build sustainable communities?</li> <li>• provide affordable housing to meet identified needs?</li> <li>• help provide good quality housing throughout the County Borough?</li> </ul>
Health, safety and security	<b>To improve overall levels of health and safety, including the sense of security, for all in the County Borough</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• improve access for all to good quality health services for planned and emergency healthcare, leisure and social facilities?</li> <li>• enhance opportunities for healthy living and empower people to take responsibility for their own health – including improving access to open space?</li> <li>• encourage people to reduce car use, and travel by walking and cycling?</li> <li>• encourage new development to be designed for security and safety principles?</li> </ul>
Community	<b>To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• help strengthen community spirit and wellbeing?</li> <li>• challenge anti-social behaviour by creating an environment where it is difficult for such behaviour to flourish?</li> <li>• help to ensure new development and regeneration provides for the communities which it will serve, taking into account considerations such as appropriate design layout and sense of place?</li> </ul>
<b>Effective protection of the environment</b>		
Biodiversity	<b>To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• help to conserve the local biodiversity as a result of land management and flood management?</li> <li>• help to conserve areas designated for national and international biodiversity significance?</li> <li>• protect and enhance habitats wherever possible, and help contribute towards biodiversity?</li> <li>• help to ensure new development maintains and enhances habitat connectivity and avoids the further fragmentation ?</li> <li>• help implement the Local Biodiversity Action Plan actions and/or targets?</li> </ul>
Landscape	<b>To maintain and enhance the quality and</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• protect and enhance the County Borough's urban, rural</li> </ul>

	<b>character of the landscape, including its contribution to the setting and character of settlements</b>	<p>and coastal landscapes and to maintain and increase access to open space?</p> <ul style="list-style-type: none"> <li>• help instil in local communities, a pride in their surroundings?</li> <li>• help to protect areas identified for their historic landscape importance?</li> <li>• bring the natural environment under positive management, including natural habitats, the historic built and natural environment and land environment meeting national quality standards?</li> </ul>
Built Environment	<b>To maintain and enhance the quality of the built environment, including the cultural/historic heritage</b>	<p>Does the strategy, policy or proposal...</p> <ul style="list-style-type: none"> <li>• protect and enhance sites, features and areas of historical, archaeological, architectural and cultural value and their setting, including features of local cultural significance?</li> <li>• encourage and support specific improvement projects?</li> <li>• maintain and enhance the built quality of settlements?</li> <li>• ensure that the County Borough remains a region of diverse and distinctive heritage and landscape?</li> <li>• ensure the most appropriate design advice and guidance is made available in connection with proposals for development to enhance built environment quality?</li> </ul>
<b>Prudent use of natural resources</b>		
Air	<b>To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere</b>	<p>Does the strategy, policy or proposal...</p> <ul style="list-style-type: none"> <li>• reduce the need for dependence on the private car through influencing people's travel choices, including making alternative, more sustainable modes of transport like walking and cycling, much easier, more attractive and a viable alternative?</li> <li>• ensure all new development takes into account the need to maintain and improve air quality?</li> <li>• help to reduce emissions of greenhouses gases in all new development and through reducing the emissions from travel?</li> </ul>
Climate change	<b>To ensure that new development takes into account the effects of climate change</b>	<p>Does the strategy, policy or proposal...</p> <ul style="list-style-type: none"> <li>• avoid development from being located in areas at substantive risk from fluvial flooding, including incorporating sustainable drainage systems in new development where appropriate?</li> <li>• take into consideration the risks of storm surges and sea defences being overtopped when planning new development in areas of risk from tidal flooding</li> <li>• Ensure development is constructed with high energy efficiency standards to reduce energy consumption?</li> <li>• ensure development is constructed to be able to adapt to the potential change in weather patterns as a result of climate change, in particular hotter summers?</li> <li>• NB: This objective relates to climate change adaptation, mitigation is addressed through other objectives including air and accessibility.</li> </ul>
Water	<b>To maintain and improve the quality and quantity of ground waters, river waters and coastal and bathing waters</b>	<p>Does the strategy, policy or proposal...</p> <ul style="list-style-type: none"> <li>• help ensure new development is constructed so as to ensure that water is used efficiently?</li> <li>• help to improve and maintain coastal bathing waters at Rest Bay and Porthcawl, and transitional waters at Ogmre-by-Sea</li> <li>• protect water bodies from pollution, for example by ensuring there is sufficient suitable waste water treatment</li> </ul>

		infrastructure?
Land / Soil	<b>To use land efficiently, retaining undeveloped land and bringing damaged land back into use</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• promote the conservation and efficient use of land, including building at higher densities and reusing previously developed and derelict land in preference to greenfield sites?</li> <li>• protect soil of higher agricultural grades from development?</li> <li>• ensure that appropriate remediation of contaminated sites is undertaken prior to development?</li> </ul>
Minerals and waste	<b>To maintain the stock of minerals and non renewable primary resources</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• ensure mineral resources are used efficiently and with the least environmental damage?</li> <li>• ensure the recycling and reuse of building materials wherever possible, such as for aggregate, in preference to primary mineral resources?</li> <li>• reduce use of primary resources through providing appropriate sites for sustainable waste management, including re-processing, recycling and sorting?</li> </ul>
Renewable energy	<b>To increase the opportunities for energy generation from renewable energy sources</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• promote the generation of energy from renewable sources?</li> <li>• ensure that, where appropriate, new developments generate a proportion of their energy from renewable sources on site?</li> </ul>
<b>Maintenance of high and stable levels of economic growth and employment</b>		
Employment	<b>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</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• help maintain a motivated, highly skilled and well educated workforce?</li> <li>• improve access to employment for all residents of County Borough, and help reduce disparities?</li> <li>• provide an infrastructure of transport, communications and land development, which attracts and retains local businesses?</li> <li>• ensure Bridgend continues to be a 'working district', providing diverse job opportunities for local people?</li> </ul>
Wealth creation	<b>To achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity</b>	Does the strategy, policy or proposal... <ul style="list-style-type: none"> <li>• achieve economic benefits resulting from tourism?</li> <li>• ensure necessary infrastructure to support a sustainable economy?</li> <li>• maintain a coherent and successful range of business support that is widely available and assists the competitiveness of local companies and local supply chains?</li> </ul>

## 7 Sustainability appraisal of the growth and spatial options

- 7.1 Part of good plan making involves choosing the best way of delivering development to achieve desired objectives from a range of alternatives. Reviewing alternatives is also a required part of plan making and sustainability appraisal (SA). The Strategic Environmental Assessment (SEA) Directive, this requires assessment of, *'reasonable alternatives taking into account the objectives and the geographical scope of the plan or programme'* (paragraph 12(2)).
- 7.2 The alternatives in plan making of greatest significance to sustainable development are those that relate to the level and distribution of growth, directed through the Spatial Strategy.
- 7.3 For the SA of the Bridgend County Borough Local Development Plan (LDP) the appraisal of alternatives has been integrated into the appraisal process. This started with an appraisal of the options for housing growth and then the appraisal of the strategic distribution alternatives at pre-deposit stages. Section 3 of this SA report shows the appraisal stages that have already been completed and how these incorporate the evaluation of the sustainability implications of alternatives.
- 7.4 The main implications of alternative distributions of development come from creating a pattern of development that would help contribute to sustainable development and help avoid significant adverse impacts on the environment. This is discussed further in Section 9 of this SA report. Some of the primary concerns for sustainable development relate to how the distribution will help reduce the need to travel and will use the opportunities that planned growth has for addressing social or economic needs throughout the County Borough. To avoid environmental impacts there is also a need to make sure that development is directed to areas where growth can be accommodated without significant adverse effects on areas of high environmental quality.
- 7.5 This section of the SA report summaries some of the findings of the earlier stages of SA, looking at growth and spatial options. The full SA reports of alternatives are available on the LDP website for a more complete picture of their relative sustainability implications.

### **Options for growth**

- 7.6 This section of the sustainability appraisal (SA) considers the alternative options for growth. It seeks to identify the main implications for delivering sustainable development of the chosen approach and its alternatives. This appraisal was part of the initial stages of sustainability appraisal back near the start of plan preparation in June 2007. A sustainability appraisal report was prepared at this stage and is available from the Council. This section of the SA report is also in the Pre-Deposit SA report.

### **Housing growth**

- 7.7 The Council developed housing growth options in summer 2007. An SA was completed for these, with the findings of the appraisal incorporated into plan preparation. Appendix 2 sets out the appraisal of low, medium and high growth

options. Although the appraisal in Appendix 2 reflects early stages of plan making it does provide an important record of how options have been considered, part of the SEA regulatory requirements. The full growth options SA can be found on the Bridgend website.

### **Summary of growth options SA**

- 7.8 Housing growth levels need to be based on realistic assumptions about economic growth. If housing supply is too high and outstrips job growth, this could lead to creating, and reinforcing, the roles of some towns and villages in the plan area as commuter settlements. This would have adverse impacts, including increasing travel for work, with impacts of environmental sustainability. There would also be adverse social sustainability impacts, as these settlements are likely to have a lack of identifiable community character and cohesion. The type of settlements where people are only really present in the evening, often referred to as 'dormitory' towns/villages, often have poor local services as few people need to shop or use local services.
- 7.9 Housing levels matched to job growth to help reduce the gross level of commuting in and out of Bridgend County Borough for work, improving accessibility performance and reducing travel need and distance.
- 7.10 Housing must be provided at a sufficient level to deliver affordable housing needs in the County Borough. Higher levels of housing in total is likely to mean higher levels of affordable housing as well, although delivery will depend on policy and development control decisions.
- 7.11 A higher growth level would require more development land. The extent to which this could be accommodated on previously developed land would depend on how this development was distributed around the plan area. Where greenfield land is required, there is the potential for adverse impacts on sustainability, in relation to biodiversity, landscape, soil and safeguarding minerals. However, the extent of these impacts will depend on the character of individual sites, both greenfield and previously developed. Although, higher growth levels will mean more land is needed for development, the exact extent of these impacts was difficult to determine simply from overall growth figures.
- 7.12 Phasing of land release may be necessary to ensure that previously developed sites are developed in preference to greenfield sites under medium to higher growth options. Phasing could also be used to deliver development in locations where it can make a specific contribution to sustainable development, including helping to create sustainable communities.
- 7.13 Higher levels of housing growth are more likely to be able to secure higher levels of financial, and other, contributions. This will help to deliver essential services and infrastructure to the communities of the County Borough, including schools, high quality open space, transport infrastructure, and affordable housing. Securing these will also depend on the locations and size of new housing developments.
- 7.14 The chosen growth level, coming forward from the original growth option paper and included in the Pre-Deposit proposals, was the 'medium' level that would provide around 8100 homes over the fifteen year period from 2006-2021. This is

approximately 540 dwellings per annum (dpa), around 78 dpa more than would be provided under a 'do-nothing' scenario where no new allocations were made.

- 7.15 This quantity increased in the Deposit LDP to 9000 homes and as a result of the Inspectors findings, increased again to 9690 homes between 2006 and 2021 in the final Plan. This is above the current housing trend, and therefore it is not clear how easy it will be to deliver this level of growth in the plan period. The current trend LDP period that has already elapsed (2006-2009) has seen only 1537 new homes delivered, around 512 per annum. At these rates over the whole plan period (15 years) this only equates to 7,685 new homes, 2000 fewer than the LDP strategy is planned for (not including the additional contingency).
- 7.16 If too much land is allocated there may be risks of sites coming forward outside the desired spatial strategy, a mismatch of housing and employment land delivery, and sites in less favourable locations in terms of sustainability being developed in favour of those more favoured by the market. The current low rate of delivery may only be a feature of the depressed housing market and not an indication of over-allocation of land. To ensure there are not adverse impacts relating to this it will be essential to monitor housing delivery and make changes to the LDP if it is found housing is not needed and being delivered to the quantity identified.
- 7.17 The quantity is also greater than the suggested figure from the South East Wales Strategic Planning Group (SEWSPG). The higher figure may reflect:
- the needs of the County Borough to identify a level of growth in keeping with economic growth predictions;
  - the level of existing commitments in the plan area leading to a need to allocate land for more homes to help implement a more sustainable spatial strategy;
  - the need to put in place a growth figure that also responds to the regeneration needs of some of the communities of the County Borough, and
  - the need to deliver new housing stock in these areas.
- 7.18 The actual sustainability implications of this growth level will depend on how this level of growth is distributed around the plan area. For example, it could be whether this will be on previously developed land, if development will be focused on areas in need of regeneration, or if development will be delivered based purely on market demand. Sustainability implications may also vary if development does not come forward exactly in line with the strategy, or where market pressure or lack of demand sees housing developed at different levels than intended.

### **Employment growth**

- 7.19 Three employment growth options were put forward for consideration in the Pre-Deposit Proposals. These were based on how much land should be allocated for employment uses in the plan. Two of the options related to the need to maintain 'committed' land, review some of the employment land allocated in the existing Unitary Development Plan, and allocate additional land in new areas. The third would see all existing allocated employment land rolled forward from the Unitary Development Plan and no further allocations. The SA of the three options was carried out for the first time with the appraisal of the full Pre-Deposit Proposals document. The appraisal tables are in Appendix 2.

- 7.20 The practical difference between the low and medium options may actually not be that great. As under both these options there is the possibility that the final quantity of land allocated for housing is the same, if the review reveals this to be suitable.
- 7.21 In order to deliver a more sustainable spatial strategy, development should be located to reduce the need to travel. Therefore, it would be preferable to limit the quantity of land allocated for employment, or phase release of land. This is important to drive the implementation of a chosen spatial strategy and help secure employment development matched to housing growth, spatially and in quantity.
- 7.22 Too much allocated employment land may lead to:
- employment sites being developed outside the desired spatial strategy
  - employment land being delivered out of step with other land uses, such as a mismatch of housing and employment
  - land being retained for an employment allocation that could be better used to serve an alternative purpose, such as housing, community use or mixed uses.
- 7.23 However, there are some economic sustainability benefits in allowing some flexibility in the choice of land. For instance it may help encourage investment in the area and provide a range of sites to provide for a variety of needs for new and expanding businesses.
- 7.24 As with housing growth, the medium option has been chosen as the preferred approach for employment growth. This would appear reasonable, however, employment land allocations even after review of sites remain in excess of take-up rates. However, the implications may depend on:
- the distribution of these allocations, and
  - the final take-up of employment land.

### **Spatial Strategy Options**

- 7.25 The Pre-Deposit version of the LDP contained options for the spatial distribution of growth. The full version of the SA of the pre-deposit draft contains the appraisal of options in detail, with the main differences repeated here.
- 7.26 Appraisal of the spatial options completed at early stages is summarised in the tables of Appendix 3. Despite two of these options no longer being referred to in the LDP the appendix provides a useful record of how alternatives were considered, part of the SEA regulatory requirements.
- 7.27 The spatial strategy alternatives covered housing, employment and retail land uses. Three alternative spatial strategies are put forward in the Pre-Deposit Proposals, each seeking to distribute development according to specific principles. These are:
- economic led
  - regeneration led
  - population and settlement led.

- 7.28 In summary, the sustainability appraisal recognises several main differences between the sustainability impacts of the alternative strategies. These impacts are shown in paragraphs 7.29 to 7.40.
- 7.29 **Accessibility and air quality:** One of the elements of a sustainable spatial strategy is helping reduce car reliance. This can involve reducing the distance people need to travel to get to work and meet their other day-to-day needs. The employment-led strategy would match the location of existing employment with housing to reduce the journey length for new residents to work. This is to help reduce car use. It would also focus development in Bridgend so that this option would increase accessibility to other facilities, such as shops and community services.
- 7.30 However, the employment option, and to some extent the population option, would see less development in the more isolated valley communities where there is currently less employment available. This would reduce accessibility to these services for new and existing residents in these areas.
- 7.31 The regeneration led strategy would help support services in the valley communities and therefore improve accessibility for new and future residents.
- 7.32 Accessibility is also linked to air quality. Where the need to travel by car is reduced, this can have benefits for local and global air quality through climate change. The strategy options for more development in the M4 corridor area, for instance in the Valley Gateway and Bridgend, may have adverse impacts on local air quality if sufficient measures are not put in place to achieve a modal shift away from car use. The employment led strategy could help in climate change mitigation.
- 7.33 **Meeting housing needs:** Under the employment led strategy, some communities, including Porthcawl, would receive very little, or no new, development. Therefore, this approach may constrain the availability of housing in these areas, pushing prices up and reducing affordability. Low levels of new housing provision in the valley areas of Ogmore and Garw also mean that new quality housing would not be provided to meet the needs of residents in these communities. This may lead to decline as young people move away.
- 7.34 **Using previously developed land in preference to greenfield land, landscape soil and biodiversity impacts:** It is likely that all options would require some additional greenfield land to meet housing needs. The employment-led option would require a large amount of new development to be focused in Bridgend, meaning that some additional greenfield land would be required to meet needs. For the regeneration option, some greenfield extensions would be required in the valley villages that are currently constrained because of the valley location. In the population-led strategy, additional land will be needed in Pencoed as there is little previously developed land left for development in this area.
- 7.35 The landscape, soil, safeguarded mineral resource and biodiversity impacts of each of these options will depend on the location of any proposed development site. Where more land is required there is more likely to be a greater impact.
- 7.36 There are several internationally designated nature conservation areas in the County Borough and, depending on the exact location, there is the potential for impact from development on these sites. This includes:

- development near Blackmill Woodland in north Bridgend, Ogmore Valley and north east Valley Gateway
- to the east of Porthcawl near Merthyr Mawr Warren
- near Cefn Cribbwr Grasslands in the western part of the Pyle/Kenfig/Cornelly area.

- 7.37 The findings of the assessment under the Habitats Regulations can be used to identify the impacts of implementing the strategy.
- 7.38 **Strengthening communities and providing local services and facilities:** The employment led option would see little new development going to some of the towns and villages identified as being in need of regeneration. This is likely to cause adverse impacts on these communities including social inequity across the County Borough. Development needs to be directed to these more isolated communities to support the existing population. It may create new employment and provide a greater range of local services and facilities. To achieve these aims LDP-guided development will need to be delivered alongside other strategies. This is the intent of the regeneration-led approach.
- 7.39 The strategy option based on population would have the undesirable sustainability impact of reinforcing the roles of some settlements as 'dormitory' areas with little cohesive character of their own. Examples of this include continued high levels of development in the Pencoed sub-area which has little indigenous employment.
- 7.40 **Employment and wealth creation:** Existing employment sites are not evenly spread throughout the County Borough and there is a disparity in existing access to employment. The market favours areas with good connections to the national road network and sites that are relatively easy to develop. Therefore, some parts of the County Borough have poor access to employment and little inward investment, such as in the upper parts of Ogmore and Garw Valleys. These areas may be helped by access to employment in the Valley Gateway this may not have direct regeneration benefits for the valley settlements. The employment strategy option would see this status quo retained. The other strategy options, particularly the regeneration led strategy, would aim to address this better by directing more development towards the valley areas. This strategy option would also direct more development to Porthcawl which can also support a range of employment opportunities.
- 7.41 The selected approach is the regeneration strategy. This aims to put more development in areas in need of investment to improve the physical, economic and social fabric.
- 7.42 This option does perform quite well in helping to achieve sustainable development. For instance, this option should help bring previously developed sites into good use, rather than relying on greenfield land to meet housing needs, unlike the economic led option. There is also potential for social and economic benefits under this option, by distributing a proportion of the development to those communities that have been suffering decline, again in contrast to the employment option. However, care will need to be taken to make sure new housing is not located in areas where there is existing poor access to employment and community services, and there is little hope that the situation would improve. In addition, there are some risks of a

mismatch of jobs and housing meaning people continue to have to drive to access employment, with adverse impacts on air quality and in relation to climate change. There are also risks for of exposing people to poor air quality in this option as high amount of proposed housing development would need to be directed to the M4 corridor.

## 8 Sustainability appraisal of the Vision and Objectives

- 8.1 The Local Development Plan (LDP) contains a vision that sets out in a simple way what the County Borough will be like in the future. This is supported by a set of objectives for how the LDP can deliver the vision.
- 8.2 Testing the LDP objectives against the sustainability objectives helps determine whether the plan will help in delivering sustainable development, or if there are potential conflicts between the two.
- 8.3 An initial version of the vision and objectives as appraised at early stages of plan preparation when the options for growth were considered. The vision and objectives changed considerably to the pre-deposit version of the LDP, although there was little change between pre-deposit and deposit.
- 8.4 The appraisal of the objectives are included as Appendix 1. This SA of objectives compares the LDP objectives to the sustainability objectives developed for the sustainability appraisal (SA) process, as shown in section 6 of this report.
- 8.5 The comparison reveals that the LDP objectives are quite comprehensive in their coverage of sustainability issues. All the sustainability objectives are addressed through one or more LDP objective. The LDP objectives do place an emphasis on matters related to building communities and promoting equitable access, over other issues such as environmental protection. However, the emphasis may be suitable in this area, given the need to address issues of equity and achieve benefits for the wider community of the County Borough. Many parts of the County Borough are in need of regeneration and renewal, experiencing issues related to access, employment services and general wellbeing.
- 8.6 The appraisal of LDP objectives does identify some that have the potential to conflict with achieving sustainable development. For instance, development in Porthcawl could have adverse impacts on the heritage coast and nature conservation assets of this area. Other LDP objectives that hope to deliver large amounts of development may also have adverse impacts on resource use and protection of natural assets. However, these are only conflicts of objectives, and the implementation of other objectives and policies will help protect against actual harm to these assets.
- 8.7 The vision sets out the what the aim is for the County Borough by the end of the plan period in 2021. The image it sets out for the future is of a sustainable place with a well-performing economy, which supports a network of communities. The vision includes spatially specific elements to demonstrate how the different towns will be performing, relevant to their strategic role and regeneration needs. If successfully implemented, the vision could have great benefits for the sustainable future of Bridgend County Borough, again this will be dependent on policy, development control decisions and delivery factors.

## 9 Sustainability Appraisal of the LDP Strategy

### Introduction

- 9.1 The spatial strategy sets the basic framework for the delivery all new development in the plan period. The purpose is to set the principles on which all applications for development will be based. Making clear the locations where development will and will not be permitted.
- 9.2 This framework is fundamental for delivering sustainable development in the County Borough. It needs to be based not only on the protection of the natural environment, but also as part of a proactive approach to achieve wider sustainability benefits.
- 9.3 The spatial strategy has an essential role in distributing development and therefore shaping the future form of the urban areas of Bridgend County Borough. It needs to look for ways to provide a mix of different land uses, such as homes, jobs and services, which people can access without getting in their car. A key concern of a sustainable spatial strategy is linking the place where people live to where they work, and the services they use daily.
- 9.4 Reducing car travel, through encouraging a more sustainable pattern of development, can help in achieving several aspects of sustainable development. These include:
- reducing emissions to air helping mitigate against climate change
  - reducing congestion can be beneficial for the economy
  - health benefits from reduced air pollution and reducing adverse impacts on health, wellbeing caused by busy and congested roads
  - social benefits as more people have equitable access to jobs and services.
- 9.5 A more sustainable strategy should also include elements such as:
- directing development away from green field land and especially areas of sensitive and high quality natural environment
  - identifying areas in need of renewal and regeneration where development could deliver benefits
  - supporting the continued viability of town centres by focusing new development in these areas
  - allocating land for other land uses that can help deliver sustainable development, for example locations for the sustainable management of waste or renewable energy
- 9.6 This section of the sustainability appraisal (SA) report considers the strategy as it appears in the strategic polices and section 2 of the LDP Deposit version and the 14 strategic policies.

## Defining the spatial strategy

- 9.7 The chosen strategy is one of 'regeneration-led', this aims to put more development in areas in need to investment to improve the physical, economic and social fabric. The distribution strategy is to focus development in areas where there are already regeneration initiatives, strategies or programmes and other priority areas where regeneration is needed. This means that development will be focused in east Bridgend, Porthcawl, Llynfi Valley and Maesteg, and the central 'Valleys Gateway' area.
- 9.8 Other areas such as the Garw and Ogmore Valleys are not the focus for development, despite being in need of regeneration. The reason for this is one of physical constraint and limits on available land, rather than not needing improvement. The strategy does aim to help these communities have greater access to jobs within the Valley Gateway area.
- 9.9 Specific development issues covered by the fifteen strategic policies are:
- Development will be directed to four Strategic Regeneration Growth Areas (SRGA)
  - Identifies that 120 hectares of land is allocated for employment in the LDP
  - Identifies that the LDP will need to deliver 9,690 new homes over the plan period, of which 1370 are expected to be affordable
  - Allocates the four strategic employment sites that will be bought forward, in some cases, jointly with the Welsh Government
  - Waste management sites will be favoured on five sites distributed around the County Borough
  - Lists the retail hierarchy and the overall provision for new comparison goods floorspace.
- 9.10 Elements of the spatial strategy are also in other policies of the plan, such as controls on development in a countryside and location of strategic mixed use regeneration areas. The written text also adds detail to how the strategy will be implemented, providing the context for the chosen approach to development distribution. Parts of chapter 2 of the LDP tell the 'story' of development in each of the four SRGA. This information provides a useful insight into how areas are expected to develop and the mix of uses that may help encourage the growth of sustainable communities.
- 9.11 The sustainability implications of the strategic policies are considered for their likely impact on delivering more sustainable development. Appendix 4 contains detailed appraisal matrices of each of the policies of the Deposit LDP. These matrices show how the policy performs against the sustainability objectives. Each contains overall conclusions on the policy's contribution to sustainable development. They also set out recommendations for policy changes or implementation approaches to improve the sustainability performance of the policy.
- 9.12 Strategic policies have a vital role to play in implementing the strategy for the LDP. They should provide the framework for implementing the chosen 'regeneration' strategy and the specified levels of growth. Their role is to provide the primary basis

for making decisions on the delivery of new development, including homes, jobs and shops, as well as guiding new waste and minerals development.

- 9.13 There is a need for the strategic policies to be worded in such a way as to set out clearly the development framework, acting as a starting point for determining any planning application. These policies need to provide certainty on the general principles for development with the other policies of the plan providing the details of exactly what controls will be put on development to manage the impacts and deliver benefits.
- 9.14 In some instances, the strategic policies could contain more detail to clearly set the spatial strategy. This could include more specific information, such as: spatial information on the location of strategic mixed use development and community hubs.
- 9.15 The distribution of development is an essential part of creating a more sustainable spatial strategy. Therefore, it would be useful to have the strategic distribution of housing and employment included as strategic policy. This would give an indication of how the proposed distribution is contributing to the strategy. The LDP contains a table (table 3.1) on the broad distribution of housing and land allocations showing how much development is anticipated in each of the SGRA and beyond. However, employment figures are only given as a land area, no estimation of what this means for job growth is given.
- 9.16 Wording of many policies is positive, for example stating '*development will not be permitted...*', '*only development that meets the criteria will be permitted...*', rather than more ambiguous wording of earlier drafts such as '*development will be favoured*'. This should help in policy implementation and enforcement.
- 9.17 The matrices in Appendix 4 include a full appraisal of each policy against the objectives for sustainable development. The matrices are an essential companion to the main text, although main findings are reported here the matrices contain additional information on the appraisal and recommendations.

### **Regeneration Growth Area Projects**

- 9.18 For each of the 'strategic regeneration growth areas' (SRGA), the LDP sets out a schedule of projects and developments that could be implemented to help deliver sustainable communities. These projects are at various stages of planning, some are only allocated land, while others are ongoing projects with existing consents. In some instances, the LDP will be the primary mode of delivery. In others, it will be in combination with other plans and strategies.
- 9.19 The implementation strategy that makes up part of the LDP helps provide the information necessary to understand how they will be delivered and what the sources of funding will be.
- 9.20 Successful implementation of these schemes will be an essential component of realising the chosen strategy and sustainable development objectives for the County Borough and the identified regeneration areas.

- 9.21 **Porthcawl:** Development in this town would deliver new housing and mixed use development necessary for regeneration, and supporting the tourism economy of the area. Proposed development sites in the town are centrally located. This helps to improve access by car, bike and public transport, with associated positive sustainability benefits. Sustainability risks of development include the loss of some open land for development, the need to address tidal flooding risk, and the proximity to the internationally protected nature conservation sites at Kenfig and Merthyr Mawr. Development will need to be delivered in line with management plans for these nature conservation sites to avoid impacts of possible increased visitor numbers.
- 9.22 Table 3.1 'The spatial distribution of growth' of the LDP shows that the Porthcawl has only 1% (total land area) of the total new employment allocations compared to 15% (total units) of the housing allocations. This may create a mismatch of jobs to homes, this disparity will cause adverse sustainability impacts. For instance, exacerbating the character of the town as a retirement location or as a 'dormitory' town with the workforce commuting out for work. This can have detrimental impacts on community character, lacking the greater vibrancy created by a demographic mix of population. An aging population will also have an impact on local health services. The majority of commuting will be by car, as there is no train station, this will lead to adverse impacts on environmental and social sustainability associated with increased car use and congestion. Some of these impacts may be in part be mitigated through the implementation of the Porthcawl regeneration strategy and regeneration.
- 9.23 **Maesteg and the Llynfi Valley:** Maesteg has been identified as one of the areas in need of a policy led approach to ensure development is delivered to overcome past under investment in the area. The schemes proposed for this area, if successfully delivered, could have significant regeneration benefits. These include a large new school, town centre renewal, improved public transport to link the area to the wider County Borough and two large new employment sites. Development could also bring long vacant land back into use. Many of the proposed development sites have been inaccessible and poorly managed for many years. Therefore, the careful design and implementation of development in these areas could improve access to green space and help join-up areas of habitats. However, this would require suitable controls and masterplanning of development to deliver enhancements to biodiversity or landscape character interest.
- 9.24 **The Valleys Gateway:** The role of this area is to allow for development in an area where a stronger market means it can be delivered through private investment, but also well located to support some of the employment needs of less successful areas such as Ogmore and Garw Valleys. Regeneration here, in continued improvements to public transport and more mixed use development has the potential to deliver sustainable redevelopment to a wide area.
- 9.25 Much of the strategy could bring benefits to the area, improving the mix of uses and providing further support to community facilities and everyday services. However, development of all schemes will need to be carefully planned and managed to secure the greatest benefits. There remains a risk, due to the nature of the settlements and position on the M4, that development in this location could create unsustainable new residential areas and large employment parks. These may be

areas where people only live or only work, travelling away for work, homes, shops and services.

- 9.26 All development will need to be planned to contribute to an improved community character, avoiding single use areas of shops, services, or employment that are only really easily accessed by driving. This could be through developing and implementing design briefs for major sites (or groups of sites). For instance continued support for improving public transport links and managing car travel to the ongoing development of the large site in Tondu. Also, the number of homes delivered should match employment delivery, to help try and make cohesive communities.
- 9.27 Development of former school sites could be essential in delivering a sustainable community. Their former community use should not be lost through inappropriate redevelopment.
- 9.28 **Bridgend:** As the main town of the County Borough, Bridgend is set to retain its role as the service centre and focus for development. This is the main town of the County Borough and therefore it is the most sustainable choice to retain this area as the focus for development. New development will need to be of a high quality design to enhance the built environment. Large new development sites, such as Parc Derwen, should be planned to create new sustainable communities, with good local services, high quality urban design and built to sustainable construction standards. To reduce car trips the site must also have good access by public transport, walking and cycling and not harm the function of the town centre.
- 9.29 Several of the proposed development sites are in peripheral locations around the town. Therefore, to avoid increased car use, development of these sites will need to be delivered alongside a modal shift away from car use. This could be through providing high quality public transport and cycle routes, and designing development to prioritise non-car travel, including providing local services. The majority of development will be on previously developed sites, although where greenfield land take is required care will need to be taken to avoid harm to natural environment assets.

### **Strategic mixed use sites**

- 9.30 The strategy includes several large sites for mixed use development. These are part of the SRGA and will deliver a large part of the housing, employment and community facilities anticipated by the LDP.
- 9.31 The strategic mixed use development sites have an important role to play in delivering sustainable development in the County Borough. This role is multi-functional and could include:
- creating places that aid regeneration and improvement to the built environment
  - creating places for existing and new communities to thrive through provision of new homes, businesses, services and infrastructure
  - making places that are accessible and reducing the need to travel especially by car

- delivering new community infrastructure, wholly or in part funded from developer contributions
- designing large sites to make more efficient use of energy, also providing the potential for district heating and decentralised energy through local generation or co-location of businesses.

### **Strategic employment sites**

- 9.32 Four strategic employment sites have been identified for the County Borough. These range from a 20 hectare site in Brocastle, Bridgend to 2.2 hectares at Ty Draw Farm. All of these development sites will need greenfield land take. Therefore, their development may have an impact on biodiversity, landscape and land/soil. However, the sites will help to deliver sustainability objectives relating to the economy.
- 9.33 These four employment sites are all located in the M4 corridor of the County Borough. Therefore, their development may help deliver employment for residents in these areas. However, there is the risk that these do not meet the employment needs of residents in the wider County Borough who have poor access to these locations. The type of development in these locations may also cause an increase in car travel and trips. This could potentially have the potential to have an adverse impact on air quality, with possible climate change and health effects.

### **Risks of implementing the strategy**

- 9.34 The objectives and the strategy as set out in the LDP and supporting text is found to be largely compatible with sustainable development. However, the actual delivery of new development does risk not coming forward entirely in line with the proposed approach.
- 9.35 The reasons for this are that approximately a fifth of the housing development, and employment land, may come forward outside of the proposed strategy of Strategic Regeneration Growth Area (SRGA) concentration. This development could come forward from:
- allocated sites outside the SRGA
  - existing housing site commitments throughout the County Borough
  - large windfall sites (not allocated)
  - small housing sites (not allocated).
- 9.36 The spatial strategy for housing is also already slightly constrained due to the quantity of development that is already committed. Figures show that 97% of housing in Porthcawl is committed, meaning that the growth in this area is not really being controlled by the LDP and is a produce of past land use planning and development control decisions. Only 5% of housing in Maesteg and the Llynfi Valley is committed, giving the potential for the LDP to have a role in shaping land-use in this location. However, the low level of commitments may indicate that there are difficulties of delivery in this location, also risking strategy implementation.

## 10 Sustainability appraisal of policies and allocated sites

- 10.1 Appendix 4 contains the full sustainability appraisal (SA) of the policies of the LDP. These appraisal matrices are for the strategic and other policies. The matrices show a comparison of the policy with the sustainability objectives to provide a systematic assessment of impacts.
- 10.2 The matrices also contain a commentary on the main impacts identified of the policy and possible ways of mitigating impacts. Mitigation is covered in greater detail in section 11. Mitigation can be through a variety of means including implementation of other policies, amendment to policy wording, through other plans and strategies or through developer contributions.
- 10.3 This section of the SA report looks at the relationship of the plan with each of the objectives for sustainable development, which were developed specifically for the SA. This section provides the main overview of impacts, Appendix 4 policy appraisals should be read in conjunction with this text for a full report on the assessment, impacts and recommendations.

### ***To ensure an increase in accessibility to opportunities, transport and to all services and information in the County Borough***

- 10.4 Potential positive impacts:
- Policies directly related to meeting this objective of improved accessibility to jobs, homes and community services, include those on transport proposals (SP3), focused retail and commercial development in town and villages centres (SP10), and the creation of new community hubs where several community services will be provided in one location (SP13)
  - Policy SP3 specifically relates to the need to deliver the strategic transport policies
  - Policy SP1 promotes new development in areas in need of regeneration which should help improve accessibility in these locations.
- 10.5 Potential adverse impacts:
- The location of strategic employment sites in policy SP9. These sites are all in the southern part of the County Borough, and in peripheral locations on the edge of towns.
  - There is the risk that development in the Valley Gateway area will lack good quality local services. Development of residential and employment development may be outward looking with new residents and employees travelling longer distances on the M4 to access jobs/homes.
  - The mismatch of new home allocations with new employment in Porthcawl may encourage car commuting to access jobs
  - All new development raises the potential for more car use, particularly in peripheral locations.
- 10.6 Recommendations:

- Implementation of the plan that supports urban layouts that prioritise pedestrians, for instance direct and attractive routes that are designed to minimise fear of crime, may help encourage people away from their cars by making walking an attractive option. This can be achieved through comprehensive masterplanning.
- Finding funding and implementing walking, cycling and public transport improvements set out in the SEWTA regional transport plan be an important part of meeting this objective. Section 106 funding should be secured from new development to help implement these schemes.
- Policies on non-car access need to be rigorously enforced, for larger sites Green Travel Plans could be used to ensure that access is a consideration of proposals.

***To provide the opportunity for people to meet their housing needs***

10.7 Potential positive impacts:

- The strategy proposes delivering 9690 new homes in the County Borough over the plan period (SP12). These will be distributed throughout the plan area, although the greatest focus will be on Bridgend, it will help provide homes for all.
- Policy COM1 and 2 show the proportion of residential development on allocated sites that should be affordable homes. This will help in delivering the homes that meet the needs of all members of the community.

10.8 Potential adverse impacts:

- The proportion of affordable housing in some areas (shown in allocations) is quite low, and less than the proportions shown in the affordable housing policy COM5. This may mean that affordable housing will not be delivered in the quantity to meet local needs.
- The quantity of sites already committed for development may mean that areas in need of growth are not being prioritised, possibly favouring new housing development in certain parts of the County Borough.

10.9 Recommendations:

- Implementation of the plan that provides for the mix of housing types required in the County Borough. This will ensure that housing delivered meets housing need, for example flats, family homes or retirement homes. This can be achieved through comprehensive masterplanning and/or negotiation with developers.
- Supplementary Planning Guidance could give more details of the conditions and funding arrangements for the delivery of affordable housing.

***To improve overall levels of health and safety, including the sense of security, for all in the County Borough***

10.10 Potential positive impacts:

- Policies on directing development to areas in need of regeneration (SP1), setting out development principles to reduce pollution (SP2), and including a policy on tourism related to outdoor recreation (SP11), should all help meet this objective.
- Elements of the LDP may help in creating places that allow for healthy lifestyle choices. Mixed use development, accessible local shops and employment,

encouraging walking and provision of outdoor space, including allotments, are all part of creating places that allow for more healthy living.

- There may also be direct benefits to safety from road and junction improvements (SP3), avoiding development on unstable land (ENV13) and pollution (ENV7) .
- The policy on adapting to climate change should help avoid the adverse well-being impacts of changing weather, including urban heating.

#### 10.11 Potential adverse impacts:

- There are also potential risks to health from policy and strategy. The large amount of new development is likely to give rise to new car trips. This could have adverse effects on air quality with associated health impacts and on wildlife. This may be exacerbated by new employment development in the M4 corridor, leading to more distribution-related employment. The movement of goods by HGV can have significant negative impact on local air quality with associated impacts on health (SP9).
- Some communities may suffer from being located near development that may have an impact on local amenity. This includes large industrial or distribution related employment sites, and potential mineral workings. There may be impacts on the health and wellbeing of these communities.

#### 10.12 Recommendations and mitigation:

- Implementation of the plan should go further in setting out how pedestrian site access to sites should be a priority. This can be achieved through comprehensive masterplanning and/or negotiation with developers. Making sure every one feels safe to walk and that their needs are being taken into account is an essential part of reducing car use. This is also an important part of encouraging public transport use, as the majority of these trips will include at some walking. Helping more people walk for short trips is an essential component of encouraging healthy lifestyles. More people walking will also mean more people on the streets, helping deter crime and encourage interactions in the community.
- All new industrial development will require control measures on operation to avoid risk to health and wellbeing
- Natural Resources Wales advice needs to be followed to ensure new development is not put at unacceptable risk of flood.

### ***To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend***

#### 10.13 Potential positive impacts:

- The regeneration initiatives proposed through the strategy should have positive impacts on communities (SP1). Where there is a focus on town or village centre renewal, this may also help community identity and distinctiveness (SP10).
- Policy SP14 sets the strategy for protecting and improving community uses. Supporting policies give greater detail to these on the protection and delivery of specific types of community facility.

- Policies on protecting the historic and built environment can also help retain features of importance to local communities that aid their distinctiveness (SP5)
- Policies relating to community facilities and the creation of 'community hubs' should have a positive impact in meeting this objective.

10.14 Potential adverse impacts:

- Land is safeguarded for coal in the County Borough in accord with national policy, if at any time in the future permission is sought for further extraction the potential cumulative impacts on communities would need to be assessed
- There is the risk that development in the Valley Gateway area will lack good quality local services. Development of residential and employment development may be outward looking with new residents and employees travelling longer distances on the M4 to access jobs/homes.
- There is the risk that housing may come forward at a greater rate or in very different locations to employment development, due to the large quantity of employment land allocated. In particular there is a disparity within Porthcawl. This may create a mismatch of jobs and homes, increasing work commuting distances. A large proportion of residents commuting out of an area daily may have an adverse impact on building a cohesive community.

10.15 Recommendations and mitigation:

- Additional guidance, possibly through Supplementary Planning Guidance, on design of new development may help deliver development that helps create communities. For example, ensuring that policies on density are enforced in a way that promotes a vibrant built environment and that encourage walking and use of outside spaces that will help people meet and interact with the neighbours to facilitate community cohesion and identity.
- Using development briefs to guide the development of regeneration areas, which may be delivered on multiple sites by different developers, will help create higher quality mixed use areas of a cohesive design. This can help make new local community hubs that are a focus for community life.
- Adverse impacts can be avoided and sustainability benefits realised through implementation of comprehensive and up-to-date regeneration strategies for communities. These can provide invaluable guidance on how development should proceed in a coordinated way. This will help to fund and deliver community facilities and good development design.
- Section 106 agreements will be necessary to benefits for the community from new development.

***To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value***

10.16 Potential positive impacts:

- Policies with a direct positive relationship with this objective include SP4 and SP2 and supporting policies such as ENV4, ENV5 and ENV6. These include provisions for biodiversity protection and enhancement.

- Other policies that may help to protect biodiversity resource include those on protection of the countryside from development. However, as recognised in policy ENV6 nature conservation assets should be protected wherever they are found.

#### 10.17 Potential adverse impacts:

- It is inevitable that development puts the biodiversity assets at risk. This includes development of greenfield land for employment and housing. However, development on previously developed land may also harm the biodiversity resource, especially where land has been vacant a long time and habitats have begun to re-establish.
- Particular risks to biodiversity arise from opencast mineral working. The removal of all topsoil and vegetation can have an irreversible impact on nature conservation sites, although good quality restoration can mean new habitats can be established in the long-term. Change to the natural environment will be inevitable.
- New development can also increase habitat fragmentation, as important connecting routes and features are lost through the clearance of sites, such as hedgerows, ponds, scrub and trees.
- Increased car travel and use of water may put some biodiversity at risk from deterioration in the air and water quality as well as water quantity that habitats rely on.

#### 10.18 Recommendations:

- Development may have an impact on the internationally designated nature conservation sites in the County Borough. In implementing the LDP, the Council should recognise the status of the sites and findings of the HRA and ensure appropriate measures are in place to avoid direct and indirect impacts on these sites.
- New parks and open space is anticipated to be delivered over the plan period. The Council should recognise the multifunctional potential of all open space. This should include protecting or incorporating features that enhance biodiversity and the landscape. The Green Infrastructure Plan for the County Borough should include biodiversity protection and enhancement.
- New features of development can also be used to enhance biodiversity, including landscaping using native species and using sustainable drainage systems to create new aquatic and wetland habitats. Policies relating to these requirements should be strictly enforced, avoiding the species poor landscaping that can often characterise landscape planting.
- Pollution impacts on water will need to be controlled through building practices, ensuring there is sufficient sewage treatment capacity to accommodate growth, and management of the water environment by Natural Resources Wales and utilities companies.

***To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements***

#### 10.19 Potential positive impacts:

- Policy SP4 has a positive relationship with this objective, as do the supporting policies relating ENV2 and 3. Policies on protecting open space from development could also help protect the landscape quality.
- Development of some regeneration sites could help in improving the landscape quality where they have been long-empty industrial sites that result in a poor quality urban fringe.
- Policy ENV3 should also help in the protection of special landscapes and enhance the transition from urban to rural.

10.20 Potential adverse impacts:

- Any of the proposed development on the periphery of towns and villages areas will have to be of a high quality design to protect the landscape quality.

10.21 Recommendations and mitigation:

- Implementation of a Green Infrastructure strategy for the County Borough will help identify areas of landscape in need of enhancing as part of multifunctional greenspace. New parks and open space is anticipated to be delivered over the plan period.

***To maintain and enhance the quality of the built environment, including the cultural/historic heritage***

10.22 Potential positive impacts:

- Policy SP2 includes the need to create high quality new development, including through design.
- Policy SP5 and supporting policies relate to the protection of the historic environment.

10.23 Potential adverse impacts:

- The large amount of development proposed in the County Borough will need to be carefully planned to ensure that the built environment is enhanced wherever possible.
- The LDP contains little detail on the need for high quality design in new development. This lack of guidance may make it more difficult to require and enforce high quality design in development proposals in the County Borough.

10.24 Recommendations and mitigation:

- Design/Development Briefs or masterplans should be prepared for all of the SRGA to ensure that development is designed in a cohesive way. A coordinated approach to urban layout will help make areas aesthetically more attractive and create a better living environment, to aid creation of sustainable places.
- The LDP currently lacks much detail on the design of new development. National policy does cover design in some detail. However, the planning system has a role to play in defining local design character and setting out to users of the plan what the principles and requirements are for good design. High quality design can have many benefits for sustainable development, not only in improvements to the built environment, but also reducing car travel, helping create communities

and contributing to healthy lifestyle choices. This could now be achieved through Supplementary Planning Guidance on these design issues.

***To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere***

10.25 Potential positive impacts:

- Policy SP2 aims sets out the objective of mitigating or minimising air pollution.
- Policies SP8 and ENV17 on delivering renewable and low carbon energy could help meet this objective
- ENV7 is a generic policy addressing pollution prevention, including air quality

10.26 Potential adverse impacts:

- There is the risk that new employment and waste management development will cause adverse impacts on air quality, although this is likely to be mitigated by relevant controls and licences.
- Increasing car and HGV movements in the County Borough may bring greater risks of adverse air quality. Several large employment sites are allocated near the M4. Development of new distribution facilities in locations already suffering poor air quality risks further deterioration and the possible need to implement Air Quality Management Areas.
- Increased congestion associated with new development may cause air quality deterioration.

10.27 Recommendations and mitigation:

- Helping people choose more sustainable alternatives to car travel will help reduce the air quality impacts created by new development. Helping implement SEWTA transport plan and mixed use development will therefore be of benefit for the area. Promotion of mixed use development through the spatial strategy may also help avoid large increases in car travel.
- Controls on some industrial development types will help protect local air quality.

***To ensure that new development takes into account the effects of climate change***

10.28 Potential positive impacts:

- Policy PLA4 specifically relates to climate change and is a catch all policy covering adaptation and mitigation of climate change impacts.
- The spatial strategy also promotes an approach to development that may help reduce car use, part of mitigating climate change.
- Policy SP2 includes the need to avoid flood risk and refers to climate change adaptation.
- Renewable energy policies will help play a role in mitigating against climate change.

10.29 Potential adverse impacts:

- The quantity of development to be delivered by the LDP will inevitably lead to an increase in carbon emissions. These emissions will be from extra car travel, business and domestic heating/power, as well as new business uses in the County Borough. The LDP has few policies in place to comprehensively address securing lower carbon power.
- New built development has the potential to put more development at risk of flood as well as possibly reducing the area of functional floodplain. Some strategic allocations may be in the areas at risk of tidal or fluvial flooding.
- Climate change combined with other possible LDP impacts, such as the loss of habitats, may have synergistic impacts related to climate change.

10.30 Recommendation and mitigation:

- Development briefs/masterplans should be reviewed to make sure that carbon emissions for new development sites are reduced in keeping with the November 2011 update of the *Renewable Energy Assessment and Energy Opportunities Plan*.
- Guidance could also be produced to address the impacts of climate change on biodiversity, and the need to protect movement/migratory routes for wildlife.
- The design of places and the layout of buildings within areas can have a role in climate change mitigation and adaptation. A policy on design, including principles for movement routes, the orientation of buildings and the design of outdoor space ad all be used to in adapting to climate change.

***To maintain and improve the quality and quantity of ground waters, river waters and coastal and bathing waters***

10.31 Potential positive impacts:

- Policy SP2 includes the need to minimise and mitigate water pollution and includes the need to ensure sewage infrastructure is in place
- ENV7 is a generic policy addressing pollution prevention, including water
- PLA4 addresses the need to avoid flood risk and ensuring sustainable drainage systems are in place

10.32 Potential adverse impacts:

- The level of development proposed through the LDP has a potential impact on the availability of water in the County Borough. Waste water may also have an adverse impact on water quality if sewage infrastructure is not sufficient to meet demands.
- New minerals workings and waste treatment sites can have adverse impacts on ground and surface waters. New minerals sites will need to have operational controls to avoid this, including long-term management arrangements.
- Mobilisation of contaminants for previously developed sites can adversely impact on surface and groundwater quality.

10.33 Recommendations and mitigation:

- Making sure that increased capacity for water and sewerage infrastructure is phased with development, to ensure it is in place prior to commencement wherever possible and always prior to occupation of development sites. This will include delivery of the water utility company asset management plans.
- Development sites will need to be managed to ensure that during construction there is no contamination to service waters from site run-off.
- Implementation of water utilities companies strategic plans.
- Natural Resources Wales advice needs to be followed on protecting watercourses, floodplains, water abstraction and flood risk.
- New development should help to ensure the more efficient use of water.

***To use land efficiently, retaining undeveloped land and bringing damaged land back into use***

10.34 Potential positive impacts:

- Policy SP2 includes the need to use land efficiently, including through the delivery of mixed use development, seeking suitable densities and setting a preference for development on previously developed land over greenfield sites.
- A minimum density policy (COM4) should help land to be used efficiently
- Many of the allocated sites are on previously developed land, bringing empty sites back into functional use.
- Development in the countryside is restricted through strategic policies and other policies relating to the distribution of development, such as PLA1.

10.35 Potential adverse impacts:

- The development proposed through the LDP, including SP9 and SP12 will result in the inevitable use of land. A large amount of allocated land are on greenfield sites.
- Large allocations of employment land, that are surplus to current take-up rates, could see land used inefficiently. There is also some overprovision of housing land based on existing take-up rates.
- Poorly designed development layout can result in the inefficient use of land and result in the need for a greater area of land needed for development to accommodate the same quantity of housing.

10.36 Recommendations and mitigation:

- Ideally previously developed sites could be phased for development over greenfield sites, so if not possible other incentives could be given for use of previously developed land

***To maintain the stock of minerals and non renewable primary resources***

10.37 Potential positive impacts:

- Policies SP6 relates to the need to protect mineral resources by avoiding sterilisation through inappropriately located development.

- Other policies on minerals development set specific criteria for protecting supplies. This includes policies ENV9, ENV11 and 14.
- Policy SP7 which relates to the provision of new waste management facilities, should help reduce waste going to final landfill and promote the more efficient use of resources. This policy is supported by the more specific policies ENV14, 15 and 16 on waste management.
- Renewable energy policies (SP8 and ENV17) will help reduce the use of finite fuels.

10.38 Potential negative impacts:

- Policy aims to protect resources, although in the long-term there is no sustainable way to manage finite resources.
- Development at the scale promoted through the LDP is likely result in the use of finite natural resources in construction and over a lifetime of occupation.

10.39 Recommendations and mitigation:

- When it is complete implementation of the Energy Opportunities Plan through updated LDP policy or through development briefs can help reduce fossil fuel use.
- Design policies should be used to help ensure new development reduces the need for primary resources and uses all resources efficiently. Supplementary guidance could address the need to make use of sustainable and recycled materials in development, and the efficient use of energy.
- Sustainable construction standards address choice of building materials and this may help reduce use of primary resources and waste.
- Construction of more waste recovery facilities will help reduce the quantity of refuse sent for final disposal, making better use of resources.

***To increase the opportunities for energy generation from renewable energy sources***

10.40 Potential positive impacts:

- Policy SP2 includes criteria on minimising energy consumption and promote use of renewable energy. SP8 and ENV17 should help secure a greater amount of energy used in the County Borough from renewable and low carbon energy sources.
- The spatial strategy may also help in reducing car trips and therefore fuel use.

10.41 Potential negative impacts:

- There will be an inevitable increase in energy use created by the quantity of new development anticipated through the LDP. Energy use will come from new businesses, homes and car travel.

10.42 Recommendations and mitigation:

- Larger development sites, such as strategic sites and mixed use sites, have the potential to deliver schemes that make more efficient use of energy, resulting in

lower carbon emissions. For example through district heat and power or district heating schemes and micro-renewable technologies. Once the Energy Opportunities Plan is complete its findings should be incorporated into revised LDP policy or development briefs and masterplans to make sure that it is implemented.

- Design policies should be used to help make sure that new development is constructed in a way that will use energy efficiently over its lifetime.
- Specific strategic allocated sites should be identified where carbon emissions will be minimised through use of innovate technology, building design and use of the site. This should be part of the Energy Opportunities Plan.

***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***

10.43 Potential positive impacts:

- LDP strategy aims for regeneration of towns that should help bring employment to areas that currently have poor access to jobs.
- Policy SP9 identifies strategic sites for employment and this should help deliver jobs in the County Borough.
- Tourism policy in SP11 should help deliver employment to areas in need, including Porthcawl and the Llynfi Valley.
- Employment site allocations should help enable employment development in the County Borough.

10.44 Potential adverse impacts:

- The identified strategic sites are all in the southern part of the County Borough. These, therefore, may not provide the land and jobs necessary to meet the needs of businesses and employees of the wider plan area.
- There is a disparity the quantity of land allocated for new employment the Porthcawl with the anticipated development of new homes. This is likely to lead to poor access to good quality employment for residents in Porthcawl.
- Some allocated employment sites have been long-term vacant. Without additional funding these sites may not come forward for development as required.

10.45 Recommendations and mitigation:

- Some employment sites may need public funding to aid delivery. In some of the more outlying regeneration areas employment sites may have to have infrastructure already in place to attract investment.

***To achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity***

10.46 Potential positive impacts:

- LDP strategy aims for regeneration of towns that should help achieve community regeneration and support wealth creation in more deprived areas.

- Policy that supports the quality of the natural and built environment will help preserve the County Borough as a location for growing businesses and attract new business investment.

10.47 Potential adverse impacts:

- The choice of employment location, due to allocations in excess of what is needed based on current take-up rates, could make it less likely that new businesses would choose to develop in communities in need to regeneration.
- Some employment sites may need public funding to aid delivery. In some of the more outlying regeneration areas employment sites may have to have infrastructure already in place to attract investment.

10.48 Recommendations and mitigation:

- Some employment sites may need public funding to aid delivery. In some of the more outlying regeneration areas employment sites may have to have infrastructure already in place to attract investment.
- Promoting high quality design of new business parks, and improvements to existing employment areas, may help attract economic investment to the area and retain growing local businesses.

### **Specific Recommendations**

10.49 The sustainability appraisal of the LDP identifies some issues of particular importance in achieving more sustainable development. Now the plan is adopted these issues will need to be strongly enforced during implementation of policies through planning application decisions. In addition, masterplanning and additional guidance such as SPG can be used to provide detailed implementation details.

#### ***Low carbon energy and district heating and power***

10.50 National policy sets the targets for delivering more energy efficient buildings throughout Wales. This national policy applies to the County Borough, and therefore there is the expectation the new housing development will need to meet Code for Sustainable Homes Level 3 with 6 credits required for energy issues. Similarly, non-residential development will have to meet 'Very Good' standards against the BREAAAM sustainable construction code, with 'Excellent Reduction of CO<sub>2</sub> for emissions'. Planning Policy Wales 2010 (PPW) also suggests that strategic sites should be assessed to see if they are capable of obtaining higher standards of sustainable construction.

10.51 The Energy Opportunities Plan will help investigate the potential for decentralised energy generation in the County Borough. Once complete revised LDP policies could be prepared and/or updated masterplans and design briefs to make sure opportunities for low carbon energy are taken.

10.52 Strategic and other large sites are to be designed to incorporate district energy supply and/or heating schemes. On these sites infrastructure will ensure all new development can connect to a local grid. Energy can then be generated from small scale renewable technology, such as wind power, small scale energy from waste plants (also providing heat). On mixed use sites there is the potential for co-location

of development to reduce energy demands and waste, for example industrial processes that create heat that can be used by nearby commercial or public buildings.

- 10.53 Losing opportunities for low carbon heat and power schemes on large sites, where potentially this type of scheme is most easy and financially viable, would be a missed opportunity and expensive to add after development is completed. Therefore, not including a requirement in the LDP would be of considerable detriment to helping reducing carbon emissions and reducing reliance on fossil fuels.

### ***Design and layout***

- 10.54 National policy in PPW contains a lot of detail on how design should be dealt with in Local Development Plans. Good design of buildings and places has the potential to play an important role to play in helping to achieve several sustainable development objectives. The potential benefits include:
- *Creating communities:* Urban layout that prioritises walking to local shops and services, including schools, and contains public spaces can help encourage community cohesion through encouraging neighbours to meet. The right density of development where buildings are closely related can also help promote this function.
  - *Reducing the need to travel:* Urban layout that prioritises walking along safe and attractive routes, has a good mix of land uses, and ensures development is at suitably high densities can help more people make local trips by foot, avoiding car use. Some past development of sinuous cul-de-sacs in areas with few community resources have resulted in fewer people walking. There are also benefits from improved local air quality and reducing carbon emissions.
  - *Health, safety and security:* Places can be designed to naturally deter crime though reducing opportunities for it to happen. For example, development can provide natural surveillance of public spaces and good lighting can make walking routes safer. Urban design can also help people make more healthy lifestyle choices. For example, making places more attractive to pedestrians can encourage more people to walk for local trips, good access to outdoor space and play space can also encourage healthy recreation for adults and children.
  - *Climate change:* As well as helping to mitigate against the impacts of climate change and reducing car travel, design can aid in the adaptation to climate change. Design of urban areas can help reduce the impacts from urban heating, make use of drainage systems to reduce flood risk, and incorporate natural spaces the movement of wildlife.
  - *Land:* Density policies and design principles can be used to make sure that land is used efficiently. Reducing the overall land take to meet housing requirements in the County Borough.
  - *Minerals and waste:* The design of building can ensure materials are used efficiently as well as reducing waste.

### ***Density***

- 10.55 PPW does not promote the use of minimum density targets for development in Wales. The LDP does contain a policy on minimum densities. It is suggested that in more accessible locations, such as near train stations and in town centres, higher minimum densities could be delivered.
- 10.56 Some residential development in the County Borough in the past has been delivered at low densities. Despite low densities providing some additional green space between buildings it can lead to a dull built character that can community character. Low densities have adverse sustainability impacts, including making poor use of land and not providing a critical mass of population to support local services. The greater area required for delivering the same yield of housing can also mean that services are further away, decreasing the viability and attractiveness of walking for some people.
- 10.57 Higher densities can make more attractive neighbourhoods, subject to careful design, supporting local services. Higher densities at mixed use locations or near good public transport routes and interchanges can also give more people access to sustainable travel choices.

### ***Sustainable travel access***

- 10.58 The LDP does include several policies on the need to make sure new development is accessible to all. To achieve sustainable development there is a need to increase the number of people using their car on a day to day basis.
- 10.59 Lowering car use will help reduce air pollution, carbon emissions, protect health and reduce congestion. Therefore, more than enhancing walking routes new development, particularly in SGRA, should emphasise the need to prioritise pedestrian access. Masterplanning should require developers of larger sites to prepare travel plans that will demonstrate how car travel to the site will be minimised, with walking, cycling and public transport access maximised.

### ***Green infrastructure***

- 10.60 The LDP policies contain some detail about the need to protect 'green infrastructure'. A comprehensive Green Infrastructure Plan will be prepared by the Council to help secure protection and enhancement of multi-functional green spaces through new development and public and private funding. Such a plan should cover the role of green spaces as, landscape features, public open space, paths and cycle routes, biodiversity links, landscaping and as part of climate adaptation.

### ***Planning strategic and mixed use allocations***

- 10.61 Many of the larger sites and regeneration areas have a Development Brief or other action plan covering the area. To help deliver sustainable development and make sure sites are used in the best way all larger development sites should have an up-to-date plan for their delivery. Development briefs should cover a variety of matters that would help make sure that the site is delivered in as sustainable way as possible. The development briefs could include:

- Design codes for development, covering issues such as massing, building heights, densities and styles.
- The mix of development and the indicative locations for different types
- A possible urban layout or factors that would need to be taken into a consideration in defining layouts, such as movement routes or protection of features on site.
- The anticipated developer contributions or funding, such as quantity of affordable homes, open spaces and infrastructure provision.
- Sustainable construction standards to be met, including sustainable urban drainage
- Low carbon energy for the site, including district heat and power.
- An implementation plan for delivery of development, in particular community facilities and infrastructure, including funding sources and delivery partners.

### ***Phased release***

- 10.62 More employment land is allocated for development than will be needed over the plan period. Also, based on current housing build rates, there may be more housing land allocated than is required. There are risks of over-supply of land to achieving sustainable development.
- 10.63 Risks are that sites more favourable to the market are chosen for development in preference to those that may help deliver the regeneration strategy. There is also the risk that employment, housing and community infrastructure is delivered at different rates in certain areas. This mismatch can lead to unsustainable travel patterns, as people need to travel further to get to work or to go shopping. Where residential development happens at a quicker rate than employment, retail and community service delivery, it can result in new neighbourhoods with poor local character, lack of community and isolated. Those who do not drive or have no access to a car may become particularly socially isolated in these locations.
- 10.64 Phasing development delivery may help to overcome these problems. There are two type of phasing that could be used, these are:
- *Phasing the release of some allocations:* Some employment or housing allocations could be phased for release later in the plan period to prioritise development in preferred locations. Monitoring will allow the phased sites to be released for development earlier, if it can be shown that development in the County Borough as a whole is being stalled.
  - *Phased release on sites:* On individual development sites parcels of development should be phased together to help deliver liveable places. For example on large housing sites new homes should not be occupied until community services, such as schools, and shops are in place. Similarly, physical infrastructure will need to be place before development is built and/or occupied, such as sustainable drainage, sewage treatment works upgrade, footbaths and open space.

### ***Implementation and delivery***

- 10.65 Essential to a sustainable plan is actually delivering development allocated and required. Some areas, especially where there is already a need for regeneration, may not be as successful as others at securing development investment due to low market values. For instance, only 7% of the anticipated housing in Maesteg and Llynfi Valleys is committed, compared to 97% in Porthcawl. This may indicate a slow market in these areas and the need to identify funding approaches to actually get development delivered in these locations.
- 10.66 The LDP contains a detailed implementation scheme for allocations, community and other infrastructure. This is proposed to be maintained as an online database post LDP adoption. This will provide an essential companion to the allocations policies as it allows all users of the plan, including the development management officers, developers and the public to understand what is expected from site development. This makes it more likely that developer contributions can be secured as they can be incorporated into site cost negotiations, as well as showing the sites that will be kick-started from public money.

## 11 Mitigation

- 11.1 The SEA Directive requires that consideration be given to how any significant impacts identified during the SA process could be mitigated.
- 11.2 Mitigation of the potential adverse impacts of the strategy can be achieved in a number of ways. Each policy in the policy appraisal (Appendix 4) gives examples of how the potential adverse impacts of the policy could be mitigated against, as does the appraisal in section 10.
- 11.3 There are several ways mitigation of possible impacts can take place, these are show in paragraphs 11.4 to 11.9.
- 11.4 **Implementing other planning policies** many potential impacts will be mitigated through the use of other policies including those of the LDP and national policy. This has a particular role to play in avoiding the adverse impacts from the quantity of development to be delivered through the strategy. Policies that will help mitigate impacts include those on natural environment protection, community infrastructure provision, design and flood control.
- 11.5 **Requirements for developers** to show how they have addressed environmental and sustainability concerns through their development. This could include green travel plans, meeting sustainable construction criteria, infrastructure delivery and biodiversity enhancement and design and access statements. There may also be site-by-site planning application requirements including further ecological assessment, flood risk assessment and travel planning.
- 11.6 The **phased release** of housing and employment sites could help delivery of allocations to help secure sustainable development. There is also the need to ensure that social and physical infrastructure is phased into development, to make sure it is place prior to occupation. This will help ensure that delivery of different land-uses are matched and facilities are in place as part of helping to make more sustainable communities and to help reduce reliance on car travel.
- 11.7 Up-to-date **Development Briefs** or **Masterplans** should be prepared for all of the larger development sites, or groups of small sites in the same area. These will help implement a cohesive development strategy for whole areas. This has greater potential to delivery high quality and sustainable development than a piecemeal approach. It should cover issues such as:
- design protocols and the layout of development
  - biodiversity protection or enhancement measures
  - the sustainable construction standards that should be met
  - the proportion of energy used on site that should be generated by on or near site renewables and low carbon targets
  - public transport, walking or cycling links between individual site elements.
- 11.8 The delivery of infrastructure improvements to mitigate some impacts, such as loss of public open space and public transport enhancement, will also be depended

developer **contributions or obligations**. These will be used to deliver sustainability benefits associated with new development.

- 11.9 Implementation of **other strategies and plans** in the plan area, with will include measures such as the regional transport plan, tourism plans and the LDP of neighbouring local authorities.

## 12 Monitoring

- 12.1 There is a requirement for monitoring of the sustainability appraisal. This provides a check of LDP implementation on sustainability development. This will need to consider positive and negative impacts, triggering a review if necessary.
- 12.2 The specific requirements of the SEA Regulations on monitoring are to:
- 12.3 “Monitor the significant environmental effects of the implementation...with the purpose of identifying unforeseen adverse effects at an early stage” (Regulation 17(1))
- 12.4 The sustainability framework is a good starting point for developing targets and indicators for monitoring. However, monitoring for the SA can be part of the wider monitoring process for the LDP, using a subset of the overall monitoring objectives. The SEA Regulations specifically state that monitoring for SEA can be incorporated into other monitoring arrangements (Regulation 17(2)), and therefore it may be possible to combine with the annual monitoring proposals for the LDP.
- 12.5 Monitoring need only begin once the LDP has been adopted and implementation begun. Therefore, a monitoring framework for the SA need not be agreed until the final monitoring framework for the LDP is in place.
- 12.6 Many of the indicators for the LDP set out in the can be used to monitor sustainability issues. Appendix 5 shows the relationship of LDP monitoring indicators as they appear in section 7 of the LDP and sustainability objectives. This is intended as an indication of how the monitoring and SA process are interlinked.
- 12.7 For a successful LDP monitoring framework the Council must ensure that the indicators they choose for monitoring are a manageable, really measure the effects of LDP implementation, and are matters over which the LDP have a direct influence. The indicators should also only address matters that are required through policy and not set indicators that exceed policy expectations.
- 12.8 In setting a monitoring framework for the LDP the chosen indicators and targets need to be:
- **specific** – in that it relates to policy objectives, indicators used for the LDP reflect what is set out in policy and strategy, and do not appear to be defining requirements that go beyond, or differ from, policy
  - **attributable** – monitoring the indicator must give results that can be directly related to the LDP policies, and should not be issues that are influenced are more likely to be influenced by matters outside the control of the LDP
  - **measurable** – it must be the case that data or information can realistically be gathered on the indicators, including whether this is possible given time and resources. Indicators could be linked to data already been gathered by other bodies, besides the planning authority
  - **timescale** – the indicator must be capable of being monitored on a regular basis, usually annually, to be an effective part of a monitoring programme.

## 13 Summary and conclusions

- 13.1 The implementation of the strategy will need to be controlled and monitored to verify that development is being delivered and whether it is helping to deliver the chosen strategy.
- 13.2 The sustainability appraisal report as a whole, including the appendices, draws out details of the likely influence of the plan in achieving development that contributes to greater social, economic and environmental sustainability. Through the identification of impacts, consideration of alternatives, mitigation and monitoring proposals the SA report also fulfils many of the requirements of the SEA Regulations, with the exception of those that come after implementation. To meet the regulatory requirements it will also be important for the plan makers take the findings of the assessment into account in the LDP, and demonstrate how it has influenced plan preparation. This has been published separately in the LDP Adoption Statement produced by the Council.
- 13.3 There is an evident need in the County Borough for the delivery of development to aid regeneration of communities. The plan area will play a role in delivering employment to serve a wider south east Wales function, including supporting the continued growth of Cardiff. The delivery of development necessary to realise the strategic objectives and vision for the Local Development Plan (LDP) will primarily be by private developers. The current economic slowdown may adversely impact delivery in the next few years, including publically funded projects. Delivery will need to be monitored to allow for contingency plans to be put in place, or alternative solutions found to secure sustainable delivery. LDP implementation will need to ensure that achieving sustainability and regeneration aims are not compromised by the current economic climate.
- 13.4 There will be some inevitable sustainability impacts through delivering the growth levels promoted through the LDP. These will be predominantly related to environmental sustainability resulting from the land-take, natural resource use and environmental protection. The scale of development may also have an impact on the character on the communities, with a need for a balance of jobs, homes and community services to help create new neighbourhoods. However, there will also be positive benefits for communities and the economy from LDP implementation.
- 13.5 In addition to the environmental sustainability issues raised in paragraph 13.3 there will also be challenges in achieving sustainability relating to travel. Without provision of an adequate and reliable public transport network, car dependency and use will increase. These impacts will be from:
- the growth distribution of development around the County Borough
  - the peripheral location of some of the strategic allocated sites, and
  - the simple impact of there being more households and therefore more cars.
- 13.6 Increased car travel can have negative sustainability impacts related to increased congestion that can have adverse economic and health effects; and increasing air pollution contributing to climate change and health impacts. Development in the M4

corridor also risks worsening air quality in relation to increased movements of heavy goods vehicles.

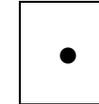
- 13.7 Part of the solution to transport issues will be locating housing, employment and everyday services near one another. This is an aim for the Bridgend LDP, although the strategy as it is set out may not be entirely effective in this given the over-allocation of employment land, which may mean sites are developed out of step with housing provision.
- 13.8 It would also be unrealistic to assume that co-location of land-uses alone would reduce car use, as proximity is clearly not the only criteria in deciding where to work, shop etc. There will always remain a need to travel between settlements to access jobs, services and for shopping. Therefore, the LDP will also need to be influential in aiming for a modal shift away from car use. This may require the LDP being delivered in conjunction with other strategies that will deliver improved public transport and high quality cycle networks. It will also be the role of the LDP to lower demand for car use by setting principles for the layout and form of development to reduce car dependence, as well as setting strict maximum car parking standards and requiring developers and businesses to contribute to achieving a modal shift.
- 13.9 A further challenge to achieving more sustainable development will be from the land required to deliver the growth proposed in the LDP. There is likely to be an environmental impact from development, and therefore, in implementing the LDP the Council will need to guide development, in form and location, to avoid adverse impacts on biodiversity, landscape character, safeguarding minerals, the built environment and to avoid flood risk. Of particular importance is the need to avoid harm to the internationally designated nature conservation sites in the County Borough.
- 13.10 A difficulty however, with drawing any conclusions about the likely contribution to sustainable development of the spatial strategy is the quantity of development that may take place outside the defined approach. The fact that a significant proportion of the total amount of land allocated for new housing and employment is already committed for development influences implementation of LDP strategy. Development that comes forward through commitments may also not be entirely compatible with the new spatial strategy.
- 13.11 The SA also notes that both housing and employment land allocations are beyond what is required based on past take-up rates. This also raises the risk of development on less desirable locations, such as peripheral greenfield sites. These sites are likely to be less sustainable, unless carefully planned, resulting in loss of green spaces and potentially increasing access by car.
- 13.12 The SA also reviewed all of the policies of the LDP, looking for their potential contribution to sustainable development. The policies show quite a comprehensive coverage of sustainable development issues and should help avoid many adverse impacts of implementing the quantity of development promoted through the LDP. However, there are a few additional matters identified in the SA that could be undertaken now the LDP has been adopted. These additional issues are:

- Completing the Energy Opportunities plan for low carbon energy in the County Borough and transferring its recommendations to revised LDP policy and/or new masterplans or development briefs for large sites and regeneration areas
- Developing a green infrastructure plan for multi-functional green spaces in the County Borough
- Prioritising pedestrians on all development sites
- Implementing the online sites database on the strategic and large mixed use development sites, to include information on delivery and implementation. Up-to-date design or development briefs should be prepared for each site. These briefs should cover sustainable development and construction, including low carbon energy provision on-site.

**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
<b>PLACES</b>																
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
<b>OB1b</b> 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.
<b>OB1c</b> 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 LDP should identify new employment sites.
<b>OB1d</b> Recognise the 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 sites 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.
<b>OBJe</b> Promote sustainable valley settlements	●	?	●	●	-	-	?	-	-	-	-	-	-	?	●	This is a positive aspiration for sustainable development, although what meeting this objective would encompass is not entirely clear.
<b>OB1f</b> 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.
<b>OB1g</b> 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

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																equitable access, and reducing congestion and resultant impacts on environmental quality. Aiming to reduce air pollution from transport can have benefits for human health and sensitive natural habitats.
<b>ENVIRONMENT</b>																
<b>OB2a</b> 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.
<b>OB2b</b> 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.
<b>OB2c</b> 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

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																physical wellbeing during flood events. There is the potential for this objective to have benefits for the landscape and biodiversity, through the creation of new water features, such as ponds and swales that can provide valuable habitats and attractive features in the landscape.
<b>OB2d</b> 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.
<b>OB2e</b> 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.
<b>REGENERATION</b>																
<b>OBJ3a</b> 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.
<b>OBJ3b</b> 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

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																growth in the County Borough. However, achieving the mix and quantity required by the market does risk environmental impacts, such as 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.
<b>OBJ3c</b> 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.
<b>OBJ3d</b> 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

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																environmental assets. However, increasing visitor pressure in some locations could have adverse impacts on biodiversity if not managed in a way that will help mitigate impacts.
<b>OBJ3e</b> 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.
<b>OBJ3f</b> 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.
<b>COMMUNITIES</b>																
<b>OBJ4a</b> Meet needs of deprived communities	?	?	?	?	-	-	-	-	-	-	-	-	-	?	-	This objective covers similar issues to OBJ3c, 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.
<b>OBJ4b</b> Equality of access to services	•	-	•	•	-	-	-	-	-	-	-	-	-	?	-	Achieving this objective is essential in order to deliver the social progress objectives of

	Accessibility	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
																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 terms of education, access to work and healthcare.
<b>OBJ4c</b> 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.
<b>OBJ4d</b> 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.

	Accessability	Housing	Health and security	Community	Biodiversity	Landscape	Built environment	Air	Climate change	Water	Land	Minerals	Energy	Employment	Wealth creation	Comments
<b>OBJ4e</b> 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 should be retained wherever possible in village centres as the focus of these settlements, and where several uses can be provided in close proximity to one another. Single shops should also be preserved, particularly where they do, or could, provide for a community need.

**Appendix 2**  
**Sustainability appraisal of housing growth options**

<b>Social progress which recognises the needs of everyone</b>		
<b>LOW</b>	<b>MEDIUM</b>	<b>HIGH</b>
<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• Potential for a changing community character in less affordable areas as local families move away, new people move into the area.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• This approach may deliver a large amount of new homes, thereby helping ensure there is housing to meet all needs.</li> <li>• 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.</li> <li>• 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.</li> <li>• This level of housing may mean that housing is better distributed around the County Borough, with greater focus on valley town regeneration areas for instance.</li> <li>• 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.</li> </ul>

<b>Effective protection of the environment</b>		
<b>LOW</b>	<b>MEDIUM</b>	<b>HIGH</b>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>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.</li> </ul>

<b>Maintenance of high and stable levels of economic growth and employment</b>		
<b>LOW</b>	<b>MEDIUM</b>	<b>HIGH</b>
<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> <li>Higher housing levels may be able to support employment of other cities and towns of south east Wales by providing more affordable housing.</li> </ul>

<b>Prudent use of natural resources</b>		
<b>LOW</b>	<b>MEDIUM</b>	<b>HIGH</b>
<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul>	<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> <li>• A level of growth above that already allocated for</li> </ul>

		<p>(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.</p>
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## Employment Options

Three options for employment are presented: low, medium and high growth. However, these growth areas refer to the amount of land that will be allocated as actual job provision will depend on other factors, including the type of employment in each site. Employment growth may also occur on existing employment sites, through intensification of use, particularly in service sector jobs.

These three levels of growth have not previously been subject to a comparative sustainability appraisal. The LDP, although needing to make provision for employment growth, is not required to implement a specified number of new jobs as it is for new homes.

No matrix based sustainability appraisal of the employment growth options has been carried out, as the matters on which the assumptions would have to be based would be too great to make any such appraisal reliable, or useful. To enable this type of comparative matrix appraisal the SA would have to make assumptions about implementation that are really beyond the role of the appraisal. For instance, the appraisal would have to make assumptions on the following matters – and if incorrectly made could give very misleading outputs to the SA.

- the actual take-up of employment land does not necessarily depend on the amount of land allocated
- the growth options are for the whole County Borough and therefore the location of growth cannot be assessed
- the number of jobs provided on any land allocation will vary based on the type of business developed
- low and medium growth options could give rise to the same level of allocations

Therefore, a more simple appraisal has been carried out, this picks out key sustainability objectives that relate to the sustainable delivery of employment land, that any spatial strategy should take into account. This appraisal of options makes the following assumptions about how the economic growth options would be implemented:

- higher employment land allocation options would result in a greater land requirement
- under higher employment land allocation options there would be greater opportunity for employment distributed throughout the County Borough
- all land allocations would be made in accordance with the selected strategic spatial strategy for the LDP
- allocations would be take up by new businesses rather than business re-locating within the County Borough.

### **Access to employment**

More land allocated for employment is likely to result in the potential for more dispersed employment growth around the County Borough, thereby helping provide more accessible employment. This should result in a reduced need to travel, and therefore positive sustainability impacts relating to reduced car use, such as improving or maintaining air quality, contribution to climate change and health impacts.

However, the converse could also be true, a high employment land bank of allocations may mean, even though dispersed sites are available, the sites selected for development are those that relate more to the demands of the market, than achieving wider regeneration benefits. So development may come forward in locations close to the motorway but are not tailored to the needs of the workforce or provide local jobs. This may increase car travel as people travel to work at these sites from throughout the County Borough and the wider south Wales area.

If too few sites are allocated this also risks decreasing accessibility, especially if sites are not distributed throughout the County Borough area. It may also have the impact of reducing the attractiveness of the area to growing businesses and inward investment reducing the overall number of jobs in the County Borough, and potentially increasing employment deprivation.

### **The efficient use of land**

If the amount of land allocated for employment is substantially in excess of the land area that is needed to meet employment needs it may lead to the inefficient use of land. Where sites have long been allocated for employment use but have shown very little evidence of ever coming forward for development it would be beneficial in achieving sustainable development to review these allocations. Review may reveal that the sites could be better allocated for an alternative use, including housing or a mixed use, or even de-allocated for development entirely. The advantages of this is it would help ensure land is bought forward for its most suitable use, helping to deliver a sustainable spatial strategy or protected from the impacts development.

Where too little land is allocated for housing then there is the risk that employment land will come forward anyway , but outside the spatial strategy and therefore potentially in locations that are not suitable to deliver the desired sustainable strategy.

### **Protection of the environment**

More land will be allocated under the high growth option, there will be nothing to prevent all of this land being developed if there is the demand. Therefore, this high growth approach could have detrimental impacts on biodiversity, landscape character and possibly built heritage, depending on the location and characteristics of the site.

A larger allocation of sites may also mean that some sites are less favourable in terms of the biodiversity and landscape assets of the site, and where these are allocated there is nothing to prevent these being the first sites developed.

**Wealth creation**

Allocating a greater range of sites in different locations and to meet different needs should help encourage investment in the area. Allocating fewer sites may make the area less attractive to those wishing to invest.

The distribution of housing will need to ensure that employment land is allocated in areas to encourage the growth of indigenous businesses, including start-ups and expanding business, in addition to larger sites that may be required by larger national or multi-national organisations. The type of land allocated will also need to respond to improving the local economy and securing benefits for local people, in addition to strategic south Wales and British economic needs.

**Overall**

In order to deliver a sustainable spatial strategy for employment development it is likely to be preferable to tailor the amount of land allocated for employment to the needs of the County Borough. This will include:

- allocating land in areas that are in need of regeneration and new employment opportunities, and this may require additional allocations
- reviewing all non-committed existing allocations to ensure that they are helping to deliver a preferred spatial strategy, in terms of quantity and location of employment land
- re-allocating or de-allocating employment sites that are better suited to an alternative use, including mixed use, or sites that are no longer suitable or unlikely to be deliverable for development, respectively
- providing some level of choice of sites and locations for new development to encourage the growth of indigenous business as well as those that serve strategic need
- possible phasing of employment site release to ensure the best use of land, protection of landscape and biodiversity assets, and aid regeneration – in order to deliver a sustainable spatial strategy

**Appendix 3**  
**Sustainability appraisal of strategic options**

The following broad assumptions have been made in the sustainability appraisal of alternative spatial strategies:

- alternative strategies will be fully implemented through policy
- policies will be in place to mitigate against adverse impacts on the natural environment
- development will be brought forward with a focus on previously developed land in preference to greenfield land
- development referred to the strategy refers to all types of development, including housing, employment and retail
- strategies refer to the distribution of development that is not already accounted for through housing and employment land commitments (it is assumed that allocations not yet committed can be reviewed, especially employment land).

Assumptions have also been made for individual strategy options to allow comparison in the sustainability appraisal:

Employment based on:

- employment being directed to locations base on the existing employment sites, and undeveloped allocated employment sites
- Bridgend would see the majority of development, followed by Llynfi Valley including Maesteg, Valleys Gateway and Pyle / Kenfig / Cornelly would also see some development, with little or none in all of the Valley areas or Porthcawl
- Reduced travel to work times for Bridgend residents and those in Llynfi Valley
- No change to travel times for those in the Valley areas or Porthcawl
- Development accommodated mainly on previously developed land

Regeneration led

- Development would be directed to locations to respond to regeneration initiatives that are already in place
- the Llynfi Valley, particularly the Upper Llynfi Valley and Maesteg would receive a significant proportion of new development
- the Valleys Gateway area would also receive a large proportion of the development
- More development is directed to Porthcawl, the Ogmore and Garw Valleys with this option than under the other options, and this may require some greenfield land take
- Pencoed has no regeneration strategies in place and therefore it would not receive any newly allocated development
- Following this option could mostly be accommodated on previously developed land, although the option does imply that development may be required on former school playing fields.
- To achieve best results the LDP strategy would need to be implemented in conjunction with other strategies to help deliver development.

Population led:

- the distribution of development would reflect the existing patterns of development in the County Borough
- the majority of development would be directed to Bridgend, although this is only around half as much as the economic led strategy
- least development in the Ogmore and Garw Valleys, although the quantity would be greater than the economic led strategy

- this strategy has the greatest amount of development directed towards Pencoed
- Porthcawl and the Llynfi Valley would receive some of the development, however, this would not be as much as under the regeneration approach

	<b>Strategy 1: Economic led</b>	<b>Strategy 2: Regeneration led</b>	<b>Strategy 3: Population and settlement led</b>
Accessibility	<p>This option would have an undesirable impact on those communities of the County Borough in most need of better access to essential services and facilities: the Garw and Ogmore Valley Villages. No new development focused on these areas would see their continued decline, with possible accumulative adverse impacts.</p> <p>Accessibility to jobs for residents of new homes would be improved by proximity to employment land. This approach may also help create more compact residential areas where more services could be provided.</p>	<p>This option is aimed to help the regeneration of towns and villages of the County Borough. This should help provide housing and services the locations where there is a need, therefore helping to improve accessibility. However, this option does create a greater disparities between the location of housing and the location of employment, meaning that in some instances job accessibility will not be so good, particularly for those communities with poor transport links.</p>	<p>This option would see a very wide distribution of development. This could have adverse impacts on improving accessibility to jobs and services. However, new development in the Ogmore and Garw Valleys could help support service provision in these locations.</p>
Housing	<p>New housing focused in Bridgend could help provide development to meet affordable needs. No new housing development in other areas would exacerbate issues of affordability in these areas.</p>	<p>This option will help provide housing in a range of locations throughout the County Borough, and this should help meet peoples' housing needs.</p>	<p>The distribution of development could help to provide homes in a range of locations to meet a diverse need.</p>
Health, safety and security	<p>The provision of development has the added benefit of being able to secure financial, and other, contributions to new community facilities, including schools, health services, and open space provision. Therefore areas with no new housing will miss out on this additional provision, with</p>	<p>Development will support regeneration initiatives in these areas, helping to maintain populations in these towns and villages in need which can facilitate delivery of health, education and other services.</p>	<p>The wide-distribution of development throughout the County Borough may mean that in any one location contributions from development are not sufficient to support expanded and improved local services, with a potential adverse impact on provision of community and health</p>

	<p>potential adverse impacts on regeneration initiatives for these towns and villages.</p> <p>Equally new development will put additional pressure on existing facilities, therefore where this development makes insufficient contribution to developing new facilities there could be an adverse impact.</p> <p>The M4 corridor suffers from quite poor air quality, therefore, this as this option puts more population in this area this location with potential negative impacts for health.</p>	<p>In some locations, where there is lower market demand, there may need to be incentives for development, potentially reducing the financial and other contributions from development with implications for delivering new services and facilities.</p> <p>This option may require development on school playing fields, and policy should ensure that this does not harm the availability of public open space for sport and recreation.</p> <p>The M4 corridor suffers from quite poor air quality, therefore, this as this option puts more population in this area this location with potential negative impacts for health.</p>	<p>services.</p>
Community	<p>Lack of new development in the Garw and Ogmore Valley villages will have an adverse impact on these communities, as these areas are in need of focused development to achieve regeneration benefits for these areas.</p>	<p>This option intends to reinforce the existing communities of the County Borough, by directing development to those areas in need of regeneration. This should have a positive impact on strengthening communities, ideally with knock-on impacts of addressing issues of social disadvantage in these areas.</p>	<p>Distributing development throughout the County Borough should help to meet the needs of communities. However, development in Maesteg and Porthcawl may not be at the level to support the desired regeneration and invigoration of these towns.</p>
Biodiversity	<p>There is the possibility that this option would require greenfield land take near Bridgend to accommodate new homes, this could have adverse impacts on biodiversity. However, the capacity of settlements is not known and therefore it is not possible to draw a clear conclusion on sustainability impacts.</p>	<p>Much of the new allocations for development could be located on previously developed land under this option. However, some greenfield land-take may be required and therefore policies will need to be in place to mitigate against impact on biodiversity.</p>	<p>As with other options this option is likely to see the majority of newly allocated development accommodated on previously developed land. However, to meet the development needs in Pencoed there would need to be additional greenfield allocations, with the potential for adverse impacts on biodiversity. Policies will need to be in place to help avoid these impacts.</p>

Landscape	There is the possibility that this option would require greenfield land take near Bridgend to accommodate new homes, this could have adverse impacts on the landscape. However, the capacity of settlements is not known and therefore it is not possible to draw a clear conclusion on sustainability impacts.	Much of the development could be located on previously developed land under this option. However, some greenfield land-take may be required and therefore policies will need to be in place to mitigate against impact on landscape quality, particularly if development is required on valley edges or other raised sites.	As with other options this option is likely to see the majority of newly allocated development accommodated on previously developed land. However, to meet the development needs in Pencoed there would need to be additional greenfield allocations, with the potential for adverse impacts on biodiversity. Policies will need to be in place to help avoid these impacts.
Built environment	Extra pressure of development in Maesteg and Bridgend could have adverse impacts on the built environment character of these areas. However, this could be mitigated against through appropriate design policies.	This option has the advantage of putting development in locations throughout the County Borough, including some areas that have declining built environment quality. Therefore, this option could help address some of these issues and bring improvements to the built environment.	This option has the advantage of putting development in locations throughout the County Borough, including some areas that have declining built environment quality. However, development levels may not be sufficient in some locations, such as Porthcawl to achieve the planned for improvements to the town.
Air	Air quality impacts are likely to come from increased traffic. This option provides a good opportunity to reduce length and number of car commuting journeys by putting new homes in close proximity to new housing. However, travel from the Valleys and Porthcawl will remain the same. In addition this option focuses a large amount of development in Bridgend, there is therefore the possibility that this could have adverse impacts on local air quality in the town through increased congestion.	Air quality impacts are likely to come from increased traffic. This option does rely on some level of continued travel to meet employment needs, therefore there is the potential for adverse air quality impacts. Putting in place a choice of more sustainable transport modes may help address this. Also, it is hoped regeneration initiatives will help support local services and facilities, reducing the need to travel to meet day-to-day needs.	Air quality impacts are likely to come from increased traffic. This option does rely on some level of continued travel to meet employment needs, therefore there is the potential for adverse air quality impacts. Putting in place a choice of more sustainable transport modes may help address this. Also, it is hoped regeneration initiatives will help support local services and facilities, reducing the need to travel to meet day-to-day needs.
Climate change	New development will have to be designed in a way to avoid the impacts of climate change, for example flood, extreme weather events and increased summer heating.	New development will have to be designed in a way to avoid the impacts of climate change, for example flood, extreme weather events and increased summer heating.	New development will have to be designed in a way to avoid the impacts of climate change, for example flood, extreme weather events and increased summer heating.

Water	New development concentrated in one area may put extra pressure on the existing waste water treatment facilities. This will have to be taken into account in planning for new development to ensure that technology and capacity is in place to protect the water environment.	New development concentrated in one area may put extra pressure on the existing waste water treatment facilities. This will have to be taken into account in planning for new development to ensure that technology and capacity is in place to protect the water environment.	New development concentrated in one area may put extra pressure on the existing waste water treatment facilities. This will have to be taken into account in planning for new development to ensure that technology and capacity is in place to protect the water environment.
Land/Soil	There is the possibility that this option would require greenfield land take near Bridgend to accommodate new homes, this could require additional land take. However, the capacity of settlements is not known and therefore it is not possible to draw a clear conclusion on sustainability impacts.  Little new development in the Garw and Ogmore Valley Villages could mean that opportunities to reclaim contaminated land are not taken.	Much of the development could be located on previously developed land under this option, with a positive benefit for the sustainable use of land. However, some greenfield land-take may be required and therefore policies will need to be in place to ensure this does not harm the soil resource. Under this option there may also be opportunities to bring former industrial sites back in to use, this can help in the remediation of contaminated land.	As with other options this option is likely to see the majority of newly allocated development accommodated on previously developed land. However, to meet the development needs in Pencoed there would need to be additional greenfield allocations, with adverse impacts on the sustainable use of land. Policies will need to be in place to help avoid these impacts.
Minerals and waste	New development may conflict with objectives of safeguarding mineral supplies, although this impact will depend on where safeguarded areas are and where development is proposed.  Focussing housing on the more accessible parts of the County Borough may be beneficial in creating more sustainable waste management systems by reducing the distance waste created by new development has to travel for treatment or disposal.	New development may conflict with objectives of safeguarding mineral supplies, although this impact will depend on where safeguarded areas are and where development is proposed.  Distributed development may make sustainable waste management and handling and treatment of waste close to its source more difficult.	New development may conflict with objectives of safeguarding mineral supplies, although this impact will depend on where safeguarded areas are and where development is proposed.  Distributed development may make sustainable waste management and handling and treatment of waste close to its source more difficult.
Renewable energy	All development above a threshold size should include a proportion of renewable	New development should incorporate renewable energy generation.	New development should incorporate renewable energy generation.

	<p>energy generation. This will be more easily achievable on larger development sites, perhaps including urban extensions to Bridgend.</p> <p>This option may miss the opportunity of creating new development in Garw and Ogmore Valley areas that makes use of the good wind resources in the head of valley locations.</p>	<p>This development includes a more new development in the Valley communities than any other option, this raises the potential for using wind energy to generate local power supplies for new development in these upland locations.</p>	<p>This development includes a more new development in the Valley communities than any other option, this raises the potential for using wind energy to generate local power supplies for new development in these upland locations.</p>
Employment	<p>This option will have positive implications for the majority of new residents of the new development as housing will be in good proximity to employment. However, existing residents may be adversely effected in Porthcawl and the Garw and Ogmore Valley communities by lack of nearby employment.</p>	<p>This option does not link new housing development to employment and therefore access to jobs may be reduced.</p> <p>However, implementing a regeneration strategy may help bring new employers into areas of need, helping these communities gain better access to jobs.</p>	<p>This option does not link new housing development to employment and therefore access to jobs may be reduced. In addition, where regeneration strategies have been developed that require new development as the driver, this strategy may not direct sufficient development to these locations to meet needs.</p>
Wealth creation	<p>For the main part this option is likely to put development in locations that are favoured by the market and be positive for wealth creation. However, this option may stifle economic growth in Porthcawl as there will not be a resident workforce to meet needs.</p>	<p>Development in Porthcawl should help promote this area and encourage inward investment in the County Borough.</p>	<p>This option aims to continue with the existing pattern of development with very little change to the status quo, therefore it is unlikely to actively improve the wealth creation in the County Borough.</p>

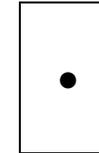
**Appendix 4**  
**Sustainability appraisal of policies**

These matrices show an appraisal of the policies Deposit Proposals against the full set of sustainability objectives developed for the SA process, as shown in the SA Report, Section 4.

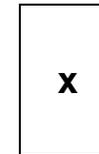
The appraisal of policies shows a simple symbol summary of the each policy's performance against the sustainability objectives. Further details of the process can be found in section 3.

### Key to appraisal symbols

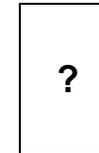
Likely to contribute to the achievement of greater sustainability according to the identified objective



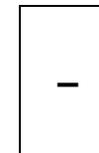
Likely to detract from the achievement of greater sustainability according to the identified objective



Likely effect but too unpredictable to specify, or multiple impacts potentially both positive and negative



No identifiable relationship between the topic covered in the policy and the sustainability concern



## Sustainability objectives

Social progress which recognises the needs of everyone		
Accessibility	<b>SP1</b>	To ensure an increase in accessibility to opportunities, transport and to all services and information in the County Borough.
Housing	<b>SP2</b>	To provide the opportunity for people to meet their housing needs
Health, safety and security	<b>SP3</b>	To improve overall levels of health and safety, including the sense of security, for all in the County Borough
Community	<b>SP4</b>	To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend
Effective protection of the environment		
Biodiversity	<b>EP1</b>	To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value
Landscape	<b>EP2</b>	To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements
Built Environment	<b>EP3</b>	To maintain and enhance the quality of the built environment, including the cultural/historic heritage
Prudent use of natural resources		
Air	<b>NR1</b>	To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere
Climate change	<b>NR2</b>	To ensure that new development takes into account the effects of climate change
Water	<b>NR3</b>	To maintain and improve the quality and quantity of ground waters, river waters and coastal and bathing waters
Land / Soil	<b>NR4</b>	To use land efficiently, retaining undeveloped land and bringing damaged land back into use
Minerals and waste	<b>NR5</b>	To maintain the stock of minerals and non renewable primary resources
Renewable energy	<b>NR6</b>	To increase the opportunities for energy generation from renewable energy sources
Maintenance of high and stable levels of economic growth and employment		
Employment	<b>EG1</b>	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	<b>EG2</b>	To achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity

<b>SP1 – Strategic development distribution</b>		
<b>Policy Summary:</b>		
This policy sets out the intention of the strategy to deliver regeneration in a sustainable way. To aid strategy implementation this identifies the main areas that will be the focus for growth, which are Bridgend, Porthcawl, the Upper Llynfi Valley and Maesteg, and the Valley Gateway. This policy has a key role to play, alongside policies on housing and employment development, on setting the spatial strategy for the LDP.		
Accessibility	●	This policy should help direct development to areas in need of regeneration, helping to provide accessible services and jobs.
Housing	●	This policy should help direct new housing development to the locations where it is required to achieve regeneration benefits.
Health, safety and security	-	This policy does not directly relate to this sustainability objective.
Community	●	There are likely to be community benefits of directing growth to those areas in need of regeneration. Some communities in the County Borough are in need of immediate action to strengthen town / village centres, to help improve community identity and well-being. This policy should help in achieving this.
Biodiversity	?	It is not clear what the relationship between this policy and this objective is, greater clarity could be given in the policy on the amount of land that would be required to meet growth needs.
Landscape	?	It is not clear what the relationship between this policy and this objective is, greater clarity could be given in the policy on the amount of land that would be required to meet growth needs.
Built environment	?	There is an opportunity in implementing this objective to deliver new high quality development to enhance and complement existing built character. This will need to be carefully managed to ensure the delivery of good quality design.
Air	?/x	The primary way air quality impacts can be reduced / maintained is through avoiding an increase in car travel by promoting development in locations with good access. The approach of this policy sees new development located in areas that are at risk of reduced air quality, along the M4 corridor, therefore new development will have to ensure that there is good access for employees by alternatives modes of transport to car travel, by providing local housing. There

		may be some inevitable air quality impacts where employment sites result in a large number of vehicle trips, either through being in a less accessible location (resulting in commuter car trips), or the industry type such as warehouse and distribution (frequent HGV).
Climate change	-	New development will need to ensure the impacts of development are taken into account, although there is no direct link between this policy and climate change.
Water	-	New development will need to ensure these impacts are taken into account, although there is no direct link between this policy and water quality issues.
Land/Soil	?	Some of the growth areas will require the use greenfield land for development. However, some development will be directed to previously developed sites and therefore this should ensure the best use of land. Including a target for the proportion of development to be delivered on previously developed land could aid this. Under the preferred strategy it may also be that contaminated land is reclaimed and bought back into good use.
Minerals and waste	?	The impacts of this policy on meeting this objective will depend on the location of new development, as there are coal, and sand and aggregate resources in the County Borough that should be safeguarded.
Renewable energy	?	The policy does not have any direct relationship with meeting this sustainability objective, although large scale new development will need to take into account on-site and off-site renewable energy generation.
Employment	●	This policy promotes growth in areas in need of regeneration, part of this growth should be employment development and this should help in providing accessible employment for all. The Valley Gateway area, in particular, can help in job provision for communities in the Garw and Ogmore Valleys.
Wealth creation	●	This policy promotes growth that should help enable wealth creation in the County Borough through regeneration initiatives and helping to provide the locations for new business development.

### Sustainability Summary

The policy identifies the need for growth that will aid regeneration in defined parts of the County Borough. The policy gives some spatially specific information on which areas are identified for growth, and that other development will have to come forward within the settlement boundaries. The allocations and locations of growth are included in the more detailed policies of the LDP.

### Main impacts

Exact impacts are difficult to identify given the potential variations in how development is delivered according to each allocation, timescales of delivery and associated infrastructure. However, it should help achieve sustainability benefits relating to social progress and meeting the

regeneration needs at growth points. With possible negative impacts related to the use of land and on air quality.

**Recommendations and mitigation**

- Other policies add the detail missing from this policy and this results in some duplication of strategic matters. Alone, this policy will not be very useful in making development control decisions and could be integrated into other policies.

**Policy PLA1: Settlement hierarchy and urban management**

This policy lists the settlements where development will be permitted. Development outside defined urban boundaries will not usually be permitted.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	?	?	?	●	●	?	?	-	-	●	-	-	?	?

**Sustainability commentary**

This policy is very straightforward, simply stating that development will be permitted within the settlement boundaries of the listed towns and villages. There should be a positive relationship with the protection of the greenfield land and the countryside. However, the policy could be more detailed on what these different tiers of settlement mean in terms of suitable types of development. Neither this nor other plan policies put controls on the type of development that would be permitted in small settlements. To achieve a sustainable spatial strategy it is important that the distribution policies are clear that development will need to fit the role and function of settlements. For example, large employment development should not be permitted in small settlements, as this would encourage inward commuting and have a disproportionate impact on the character of the community.

**Main impacts / mitigation / recommendations**

- Other policies, including strategic policies, should refer to this settlement hierarchy to help determine the suitability of development in each settlement and therefore implement a sustainable distribution strategy, for all settlements not just growth areas. This should be addressed in policies on housing, employment, and retail development.
- If this policy is simply a tool to prevent development in the countryside it could be included in the environmental protection section.

**PLA2 Implementation of regeneration strategies**

This policy states that new development that would hinder delivery of regeneration strategies will not be permitted.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	?	?	●	-	-	●	?	?	-	●	-	-	?	●

**Sustainability commentary**

Several parts of the Country Borough are in need of regeneration, which will help deliver social and economic benefits to these areas as they are defined in relevant strategies and supporting text. Delivering development in line with strategies is essential in to deliver the desired benefits.

**Main impacts / mitigation / recommendations**

- None

**PLA3 - Regeneration and mixed use development schemes**

This policy lists the principle regeneration and mixed use schemes and the general principles for their development.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	●	?	?	?	?	●	?	?	?	?	?	?	?	●

**Sustainability commentary**

The individual sites should each have an up-to-date development brief to guide their development, and delivery according to this brief is part of the policy requirements. The regeneration of these sites could have substantial benefits for the County Borough, the physical renewal could have positive social and economic impacts on sustainable development.

Individual sites will have unique opportunities and constraints on delivering more sustainable development. However, the size and mix of development on these sites means there is the potential for them to have real benefits for sustainable development. For instance, large sites can deliver well designed places that support sustainable travel, walking, provide affordable housing, and there are also opportunities for these sites to make use of decentralised carbon efficient energy. Development Briefs should be reviewed and kept up-to-date with good practice on sustainable

place making where they phased later into the plan period or have an older existing brief.

Individual sites will also need to take into account site specific constraints, in order to help deliver sustainable development. For instance, helping to prevent against flood risk, protecting biodiversity and protecting built heritage.

### **Bridgend**

Development in Bridgend is focused on an 'arc' of development sites, several of a significant size. The two largest are at Parc Derwen (mostly greenfield) and North-east of Brackla (previously developed). Care will need to be taken in delivering these strategic to make sure new sustainable places are created that support viable communities and provide a good place to live.

#### **PLA3(1) Parc Derwen**

This is a large predominantly greenfield site that already has a planning permission for 1500 new homes. The site will also include a primary school, commercial centre and open space. There is the potential for this site to deliver a new local neighbourhood with accessible employment and essential services, therefore reducing the need to travel. There is also the potential for this site to contribute to the growth of new accessible facilities in association with PLA3 (2) and together their development could help deliver sustainable growth to this part of Bridgend. Care will need to be taken in delivery to minimise adverse impacts on the natural environment, including flood risk, biodiversity and water pollution. The allocation overlaps with a site of local nature conservation importance (SINC). The site already has outline planning permission.

#### **PLA3(2) North-East Brackla Regeneration Area**

This site is a large site, south of PLA3(1), currently predominantly previously developed. There is a development brief covering the area and it is allocated for around 550 new homes, employment, bulky goods retail, playing fields and community buildings. Much of the site is already developed for employment, although pockets of vacant land remain. However, a site masterplan is being developed for comprehensive regeneration of the site. There are opportunities to ensure that any design proposals are of a very high quality, this could include new district heating and power, potentially in association with PLA3(1). Site development would also need to take account of the site's designation as an 'archaeological sensitive area' and proximity to the protected green wedge. The site also overlaps with a site of local nature conservation importance (SINC).

#### **PLA3(3) Coity Road Sidings**

This is a narrow strip of land along an old railway sidings. The site is identified for 150 new homes, office or light industry and park and ride. The site has no design brief or planning permission. More detail may be needed on how best develop the site to make use of the narrow shape and potential and sustainable transport hub, including high quality walking and cycling connections to central Bridgend.

#### **PLA3(4) Parc Afon Ewenni**

This is a mixed use development area that is currently predominantly an industrial estate. There is a development brief covering the area and a new masterplan is being produced and it is allocated for around 650 new homes, local retail, community buildings and educational/training facilities. The site has no constraints identified on the proposals map.

## **Maesteg and Upper Llynfi Valley**

The valley communities are a focus for regeneration through development of large previously developed sites. None of these strategic sites have yet to received planning permission or have an active planning application on them. PLA4(7) and (8) will need to both in part be funded from public money to help deliver development.

### **PLA3(5) The former Maesteg Washery**

This is reclaimed land which was previously a coal washery. The site is designated for 125 new homes with no other designation covering the area, although part of the site has already been redeveloped as a secondary school and playing fields. Recreational uses are also anticipated on the site, although the land is not directly allocated as such. The site has no design brief or planning permissions. To help deliver development here a design and implementation plan will be needed and a joint design brief should be prepared with site PLA3(7). The site is adjacent to the urban boundary, beyond this is a 'secondary coal safeguarding area' – however, the urban buffer should mean that mining does not take place in 500m of the site. A walking and cycling route is identified through the site and this could help support cycle and walking instead of driving for access to main services and jobs. The site is located in the town centre, although extends north and east to the urban boundary. Good walking and cycling links should mean that there is good potential for the site to be easily accessed by non car modes of travel.

### **PLA3(6) The Coegnant Reclamation Site**

This is a previously developed site is designated for 100 new homes, employment and playing fields. The site has no design brief or planning permissions. To help deliver development here a design and implementation plan will be needed and a joint design brief should be prepared with site PLA3(5). The site is adjacent the urban boundary, beyond this is a 'secondary coal safeguarding area' – however, the urban buffer should mean that mining does not take place in 500m of the site. A walking and cycling route is identified north and south of the site, however, this should be extended through the area to ensure continuity of non-car travel and links to PLA3(6). The site is separated from the town centre and therefore will need to have good quality sustainable transport routes to ensure that new residents have access to essential services, and to help reduce car use.

### **PLA3(7) Former Ewenny Road Industrial Estate**

This site is located south of the town centre in a predominantly residential part of Maesteg. The site is anticipated to deliver 125 new homes, as well as some employment and out of town retailing. There is a development brief for this site. It presents an opportunity to provide some accessible services to this part of Maesteg, to enhance the area. There is currently a masterplan being developed for the site and good design and urban layout, with walking and cycling connections to surrounding communities, will be essential on this site to ensure it effectively brings about regeneration and better access.

## **Porthcawl**

### **PLA3(8) Porthcawl Waterfront Regeneration**

This is the major development site in Porthcawl, which will play an essential role in the regeneration of the town and its tourism role. The site already has planning permission for new housing, and 1350 are planned for the site. The site is intended to provide a new service centre for the town, and will include a 'community hub' with health and other community services. Part of the site is also allocated for improvements to the retail

offer. New development will need to be of a high design quality to enhance the area as a tourist destination and complement the position next to the Special Landscape Area. The site is also near the Merthyr Mawr Warren part of the Kenfig Special Area of Protection. It is important that development at the regeneration site does not harm this nature conservation asset, the site also overlaps with a site of local nature conservation importance (SINC). The site has good access to the town centre that can be improved through protection and enhancement of the walking and cycling routes.

An adopted Supplementary Planning Guidance should help make sure that the site is delivered in a way that contributes to sustainable development and helps realise a joined-up vision for the area.

#### **PLA3(9) Pwll-Y-Waun**

This site is situated to the north east of central Porthcawl. It is currently an open pasture allocated for new housing, employment and amenity space. The site is not far from the town centre and improvements to walking and cycling routes should help ensure it is accessible to the range of services in the centre and on site PLA3(9). As with all Porthcawl sites care needs to be taken to avoid adverse impacts on protected nature conservation sites (the site overlaps with a locally designated SINC site) during construction and occupation of the site.

#### **The Valleys Gateway**

Development in this location aims to help support the valley communities by permitting growth in a location that is attractive to the private sector but also can play a role in supporting the communities of the Ogmore and Garw Valleys, where inward investment has been less successful. The allocations will need to be delivered in ways that support this objective and does not exacerbate less sustainable travel patterns. Development in Ogmore schools will help consolidate community uses while allowing some land to be developed for alternative uses.

#### **PLA3(10) Land west off Maesteg Road, Tondu**

This is a large site in Tondu to the west of the A4063. It is a major redevelopment site, and some development has already been delivered, including tourism and visitor facilities. The site already has some planning consents on it including permission for 436 new homes. Part of the site is also allocated for employment. No design brief has been prepared and this would have helped implement more sustainable development. Part of the site is covered by a conservation area and this will need to be reflected in high quality design of new development to help enhance this.

This is in a peripheral location, therefore it is essential that the site is designed to enhance access to nearby services as well as to ensure the distribution of land uses on site is designed to encourage walking. The site is well connected to public transport, although its location does mean access by car will always be an attractive option. Planned road improvements near the site must take into account all road uses, including buses and for cycling.

#### **PLA3(11) Former Christie Tyler site, Brynmenyn**

The site already has planning consent for 75 new homes. The site is also allocated for employment. The location is relatively cut off from nearby residential development by the A4065 in a largely industrial area. New development will have to be delivered so as to create an attractive new community, and this will need to include good links to services, in order to help make an attractive place to live, rather than a dormitory area. It will be essential to protect residential amenity for new housing in this location.

**PLA3(12) Ogmore Comprehensive School**

This site is allocated for 130 new homes as well as continuation of the existing land use – a comprehensive school. The site has yet to receive any planning consent or have a design brief prepared. The site is currently in use as a school, to avoid adverse impacts on the community it will be important to ensure that the site retains its community function role. Playing fields should not be built on unless it can be proved they are surplus to requirements. This is in a peripheral location, therefore it is essential that the site is designed to enhance access to nearby services as well as promote easy movement round the site and the mix of uses on offer within it. Planned road improvements near the site must take into account all road uses, including buses and for cycling.

**PLA3(13) Gateway to the Valleys Mixed Use Development, Yynsawdre**

This site is more centrally located than the other Valley Gateway sites. It is allocated for new housing and various community facilities. There is no design brief covering the site. There should be a design brief for this site, possibly including sites PLA3(12) and (13). Development needs to be delivered that helps support the communities of this part of the County Borough, providing local services and shops that can be easily accessed by walking or cycling, without the need to travel longer distances or by car. For the scale of housing growth and existing employment delivery of development must be phased with delivery of new community services and shops to meet local needs to help create a sustainable place. Housing development in this part of the County Borough is at risk of causing an increase in the need to travel with more communities not supported by the essential services and community resources essential for a sustainable neighbourhood.

**PLA3(14) Bryncethin Depot, Bryncethin**

This previously developed site is on the periphery of Bryncethin. The site is allocated for a mix of uses, including 50 new homes, on a former depot site. The site will also provide new local services for communities, improving accessibility and reducing the need to meet day-to-day needs. Redevelopment will result in the loss of a local employment area, however jobs intensity on the site would have always been low. The site is on the A4061 that separate the two parts of the European nature conservation site 'Blackmill Woodlands'. The woodlands are sensitive to poor air quality therefore it is essential the new development does not raise the level of car use in the area or result in deterioration of air quality for other reasons.

**PLA3(15) Glanyrafon, Tondu**

This small mixed use site is allocated for around 30 new homes. It will also provide a new health and wellbeing facility that will be an important community resource in the area with clear benefits for community wellbeing as well as helping reduce the need to travel and providing equitable access to health services.

**Other areas**

In addition to mixed use redevelopment within the Strategic Regeneration Growth Areas a further five allocation are made for mixed use development in the County Borough. The largest is in Bettws where 80 new homes are planned. The redeveloped of these sites provides an opportunity to meet specific needs of communities, including jobs and community facilities.

**PLA3(16) Land South West of City Road, Bettws**

The site located on Bettws' urban fringe and is a former residential development, although standing structures have been cleared. It is allocated

for 80 new homes. There is no design brief or planning consent on the site. The implementation plan indicates that the site is to be developed for residential and new open space, although the text in appendix 1 suggests a new shop at the site. This mix of uses will need to be secured through specific policy criteria. Although the site is accessible to central Bettws it is quite peripheral. The village has reasonable service provision but its elongated shape can mean that walking distances can be long. This means that that new development must include improved walking access to shops, including on-site and attractive pedestrian routes. Some nearby housing estates are poorly laid out making very inefficient use of land that could result in an insufficient critical mass of population to support local services. Existing estates with cul-de-sacs and unattractive footpaths make walking are likely to mean driving to services is preferred to walking. New development at this location presents an opportunity to improve the urban environment and create an attractive living environment, promoting community cohesion and development that supports services, through good design and more efficient use of land.

**PLA3(17)** Land adjoining Cwm Ogwr Fach, Blackmill

This is a gap site in Blackmill's built up area, adjacent to an existing employment allocation. The site already has planning permission for housing and is also allocated for a new community building/enterprise centre. Development in this location will have to be of good design quality to complement the position next to the strategic landscape area. Blackmill has some local services and provision of a new community facility will have a positive benefit for the area. Development will need to ensure that new houses do not suffer from adverse residential amenity due to the location adjacent to the Isfyn Industrial Estate.

**PLA3(18)** Land at Gibbons Way, North Cornelly

This site is located within a North Cornelly residential neighbourhood. It has planning permission for housing, as well as an enterprise centre, play area and youth building. Development in this location has the potential to have good access to a range of community services, shops and is not far from the train station. Existing residential development is of poor quality and makes inefficient use of land that brings few benefits to the character of the area. New development should ensure that it is of a higher design quality making an attractive place to live, promoting walking and cycling. The network of green spaces in this area could also be significantly improved for their aesthetic quality and for urban wildlife.

**PLA3(19)** Coychurch Road, Pencoed

This site presents a significant opportunity for regeneration. Centrally located and adjacent to the train station, this site could provide a range of new accessible facilities to support the town. The site is allocated predominantly for a new convenience store as well as limited number of new homes. The drawn site area does not relate well to the description, with the area shown larger than the area described. The description also implies and either/or for the site allocation, and this may be a decision that should already be decided on the basis of need and what would help in delivering sustainable development to this area.

**PLA3(20)** Ty Draw Farm, North Cornelly

This site contains allocations for both strategic employment purposes and residential development. The housing element will be a significant driver in making the employment land deliverable in the short to medium term, with the potential for job creation in an area of need. Depending on the type of employment and training provided there could be benefits for local deprived communities. The site would result in the loss of greenfield land with possible impacts for biodiversity and landscape. The site is in good proximity to central North Cornelly, although as with other strategic sites the M4 connections may mean many people travel longer distances by car to work at the site. However, cycle and walking access

improvements could help local people to choose non-car modes to access the site.

### **Main impacts / mitigation / recommendations**

- The policy covering these sites could be developed to stipulate criteria that would have to be met in their development, this could include site specific access improvements for sustainable transport, biodiversity enhancement, built environment design etc. These criteria could be developed from the design brief covering the site.
- Implementation plans help to identify the mix of uses on the site, and this should help in their delivery. Implementation tables include funding streams, including the contributions needed from development. This is essential to ensure opportunities for developer contributions are not lost. The implementation plan helps provide certainty to developers that associated infrastructure will be delivered and therefore it is worth investing in site development.
- Some sites could be linked, including in design briefs, to help deliver new accessible services and support sustainable communities. Examples include PLA3 (5) and (6) and potentially a joined up scheme for the Valleys Gateway strategic and other allocation sites.
- Use of development briefs on all sites will be useful in ensuring the correct mix of development is delivered and the urban design and layout provides for a unified approach to development. This will help create more sustainable place that support more sustainable communities.
- Valley Gateway is to see quite substantial growth relative to its size and availability of community resources. Without careful joined up planning of the various development sites, opportunities may be lost to provide new housing development that supports more sustainable neighbourhoods and encourages walking and cycling over car use.
- Development will need to ensure it will not harm any of the internationally designated nature conservation sites. In particularly Porthcawl sites need to avoid harm to the Kenfig / Merthyr Mawr Special Area of Conservation.
- Design policies will need to be in place to ensure new development design and layout supports sustainable development. This will include making new neighbourhoods easily permeable to walkers, make best use of land, support a critical mass of development to support new services and supports passive heating and cooling of buildings to reduce energy demand.

### **SP2 - Sustainable place making principles**

#### **Policy Summary:**

The policy includes a comprehensive list of criteria with the aim of delivering more sustainable development. These criteria will need to be supported by more detailed policy to ensure that sustainability benefits are fully realised.

Accessibility	●	There is a criteria on 'equity of access' and it is assumed that this applies to access of buildings and overall development access, clarity in the policy could enhance deliver of these aims. To achieve sustainable development reducing car reliance is essential there is a criteria for improving access to the site by all modes, including walking and public transport.
Housing	?	The policy does not directly relate to housing, however the protection of residential amenity should help in creating healthy places to live.
Health, safety and security	●	The policy includes several criteria that should help in the protection of health of residents. The policy should recognise the need to avoid putting new development at risk of flooding. Actual and perceived flood risk can have adverse impacts on wellbeing. The policy requires that land be free from contamination, which is essential for avoiding harmful health effects.
Community	●	This policy could help contribute to improving communities by creating new high quality places to live, through good quality urban design and designing out crime. The policy also requires that community facilities are protected and provided where necessary.
Biodiversity	●	Biodiversity protection and enhancement is part of this policy and highlights the importance of this principle.
Landscape	●	Policy refers to the need to protect landscape character.
Built environment	●	The policy includes criteria of delivering good quality built development and development that does not adversely affect amenity and is of an appropriate scale to its location. This should help in meeting this objective.
Air	●	The policy should address the need to reduce car travel, and ensure all new development is accessible by foot, cycle and on a good bus service. The policy also aims to help avoid air pollution, although greater detail may be necessary on showing how this will be achieved through planning policy.
Climate change	●	The policy includes criteria on reducing flood risk and this should help in meeting this sustainability objective. Although more detail could be added on the sequential approach.
Water	●	The policy includes the need to protect water from pollution, and implementing infrastructure for the proper disposal and treatment of sewage.
Land/Soil	●	The policy promotes the efficient use of land, explicitly stating that previously developed land should be developed in preference to greenfield land. The policy also highlights the need for development to be at a suitable density.

Minerals and waste	?	The policy includes criteria on ensuring the appropriate disposal of waste, although this should perhaps be worded to ensure the appropriate treatment of waste in preference to disposal.
Renewable energy	?	The policy does refer to the need to help promote renewable energy generation, however it may be suitable for the policy to have more detail on these matters. This could include the need to generate part of the energy requirements on larger sites from renewable sources, and the use of the Strategic Areas of Search for delivering national grid schemes.
Employment	-	This policy does not directly relate to meeting this objective.
Wealth creation	?	This policy does not directly relate to meeting this objective, although by creating and maintaining a high quality built environment it may be possible to improve the attractiveness of the area to inward investment.

### **Sustainability Summary**

The policy aims for more sustainable development and sets out a variety of matters through which development will need to be tested to help deliver sustainable development. While the overall approach of the policy should help in securing more sustainable development, more certainty could be provided on how these criteria will actually be used to test planning proposals. This could be enhanced by including more specific targets or thresholds in the criteria, for example requirements for meeting sustainable building standards. Changes in wording could also raise the importance of these matters in guiding the type and form of development.

### **Main impacts**

There are unlikely to be any significant adverse sustainability impacts from this policy, although there is scope for improving the policy wording and detail, to ensure no opportunities are lost for implementing more sustainable development through ambiguously worded policy.

### **Recommendations and mitigation**

- The delivery of expectations could be improved through including firm thresholds and targets, such as on the Code for Sustainable Homes or BREEAM
- More detail should be given on how development should secure the delivery of renewable energy, particularly on-site and micro-renewable schemes. This could also be achieved by way of site specific development briefs.

## **PLA4 – Climate Change and peak oil**

This policy sets the criteria for helping mitigation and adapt to climate change, including reducing energy use and avoiding flooding.														
Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
●	-	?	?	?	-	-	?	●	●	-	-	●	-	?
<p><b>Sustainability commentary</b></p> <p>The LDP has a major role to play in helping to mitigate and adapt to climate change. The spatial strategy has a role to set out the pattern of development to reduce travel demand and this policy can set the finer details.</p> <p>It is recognised that it is important that the policy does not repeat national policy relating to climate change. Therefore, issues such as homes meeting Code for Sustainable Homes and BREEAM standards are not included and details on how lower carbon energy can be achieved. However, without more detail it may be difficult to secure the necessary climate change adaptation and mitigation measures in new development. Additional matters could also be covered in the policy including the need for new public spaces to be designed to avoid urban heating effects, and the potential of district wide energy schemes.</p>														
<p><b>Main impacts / mitigation / recommendations</b></p> <ul style="list-style-type: none"> <li>The policy, or supplementary planning guidance, could include additional climate change considerations, such as using natural landscaping and planting to reduce urban heat island impacts</li> </ul>														

<b>SP3 – Strategic transport planning principles</b>		
<p><b>Policy Summary:</b></p> <p>This policy addresses the transport needs of new development, prioritising sustainable transport including public transport, walking and cycling. The policy includes details of locations that should be the focus for improved transport and the specific transport schemes that need to be delivered in the County Borough. This policy also includes road improvements as well as other transport initiatives.</p>		
Accessibility	●	The intention of this policy is to improve accessibility to jobs and services for all in the County Borough, by locating development near to transport routes and helping to deliver improved public transport.
Housing	-	This policy has no direct relationship to this sustainability objective.

Health, safety and security	?	Providing equitable transport access to health services is essential in delivering more healthy communities. Some road improvements may also help to improve the safety of roads.
Community	?	Improved transport access can help support communities in a variety of ways, including access to essential services and jobs. Also, linking up communities can help people feel connected to the wider area and access opportunities that are not available in their local neighbourhood. To maximise these benefits the policy will have to be implemented in association with other strategies and plans on promoting good quality and affordable travel.
Biodiversity	?	This policy does not directly relate to meeting this objective. However, some development may require new land take with possible impacts on biodiversity, and policy will have to be in place to help avoid and mitigate against adverse effects.
Landscape	?	This policy does not directly relate to meeting this objective. However, some development may require new land take with possible impacts on landscape character, policy will have to be in place to help avoid and mitigate against adverse effects.
Built environment	?	This policy does not directly relate to meeting this objective. However, some new transport infrastructure will require some built development, policy will have to be in place to help ensure this is of a high design standard and compliments and enhances its setting.
Air	?	There will be mixed impacts from this policy. Clearly there is an overall policy intention for implementing more sustainable modes of transport, with potentially positive impacts on air quality through reducing car dependency. However, new road provision will do little to reduce car use, and therefore the effects of these types of schemes may have some adverse impacts on air quality.
Climate change	-	This objective relates to adaptation to climate change and therefore the policy does not have any direct relationship with this objective.
Water	-	This policy is unlikely to have any effect on meeting this objective, subject to new development being designed in accordance with good water management policy, particularly for road run-off.
Land/Soil	-	This policy does not directly relate to meeting this objective. However, some transport infrastructure will result in the loss of greenfield land, for instance new link roads, and policy will have to be in place to help avoid and mitigate against adverse effects.

Minerals and waste	-	This policy does not directly relate to meeting this objective.
Renewable energy	-	This policy does not directly relate to meeting this objective.
Employment	●	Improved access is likely to be beneficial in terms of meeting employment needs of the resident workforce. This policy should help improve peoples' access to jobs throughout the County Borough, as well as promoting the more sustainable location of development.
Wealth creation	●	A good quality transport network in the County Borough will help to encourage wealth creation, through improving the accessibility of sites for indigenous economic growth and encouraging inward investment.

### **Sustainability Summary**

Overall the intention of this policy is supported in seeking more sustainable development. Provision of improved public transport routes and links, and promoting cycling and walking can help ensure an accessible area, with greater equity in access to services and jobs. Promoting better spatially linked development to reduce the overall need to travel should also have beneficial impacts, although this will need to be delivered in combination with other LDP policy on the distribution of development to direct this to more accessible areas.

Road capacity improvements are likely to have adverse sustainability impact through increase car use and therefore having adverse effects on air quality, climate change and health. There may be economic benefits in terms of reduced congestion, however these may be lost in the long term as traffic increases to fill spare capacity, with air quality impacts and contributions to climate change.

### **Main impacts**

Impacts of this policy may include helping to reduce reliance on car use, and increase equitable access for all. Although many road improvements are also planned that may encourage car use, with negative environmental impacts.

### **Recommendations and mitigation**

- Other plan policies will help mitigate possible adverse effects of implementing new transport schemes. For example, where land is required for development policies on biodiversity, landscape, built environment etc. will have to be in place to help avoid and mitigate potential adverse effects
- New roads and development will have to be planned to avoid the cumulative harm to air quality
- Achieving transport mode shift away from car use will have be delivered in combination with other plans and strategies, for example, on providing affordable transport, new public transport, and walking and cycling routes.

**PLA5 – Development in transport corridors**

This policy simply sets out the main routes into the County Borough and the planning controls on them.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
●	-	?	?	-	-	-	-	-	-	-	-	-	-	?

**Sustainability commentary**

This policy should help protect these routes. However, it is difficult to see how development that would ‘create or exacerbate harm to the environment along them’ will be managed. New development is likely to cause increase in car travel and this may have a harmful environmental impact.

**Main impacts / mitigation / recommendations**

- None

**PLA6 – Development West of the Railway Line Pencoed**

This is a specific policy to prevent development that would increase traffic in the given location.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	?	●	-	-	-	-	●	-	-	-	-	-	?	?

**Sustainability commentary**

This policy should help protect existing residents from the adverse impacts caused by heavy traffic congestion and idling vehicles. The policy may also prevent the adverse economic impacts of congestion, although there is the possibility that it may prevent new employment or housing development in this location.

**Main impacts / mitigation / recommendations**

- None

## PLA7 – Strategic Transport Improvements

This policy sets out the 27 identified transport improvement schemes to be delivered in the County Borough, which relate to improvements to walking/cycling, public transport and road improvements.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
•	-	?	?	?	?	?	?	?	-	?	-	-	?	•

### Sustainability commentary

Any improvements that help people choose alternative travel to the car and which promotes equality of access can have significant sustainability benefits. Environmental benefits come from reduced air pollution and carbon emissions, this reduces health impacts of travel. Benefits to communities also come from reducing congestion and the damage this can have on neighbourhoods, for example community severance. Reduced congestion from private car travel can also be of benefit to the economy, by speeding up the time it takes to move goods. Non-car travel can also have health benefits as it is more likely to include walking, everyday exercise is important for health.

Providing attractive, safe and segregated routes can encourage walking and cycling. There are multiple sustainability benefits from reducing the proportion of people who make daily trips by car to easily accessible locations. Benefits include personal health and wellbeing, reducing harmful emissions with benefits for air quality and wider health, it also can help mitigate against climate change.

Improvements that would see new roads built or capacity increased can have some positive sustainability impacts for the economy. In addition, where improvements specifically include measure that will support buses, or segregated walking and cycling routes, these can have benefits for sustainable transport.

### Main impacts / mitigation / recommendations

- Ensure conditions and contributions are secured in new development to help implement delivery
- Prepare a delivery and implementation strategy for new schemes
- To achieve a mode shift from car use to more sustainable modes of transport this policy needs to be implemented in combination with other strategies on encourage walking, cycling and bus use, this may also require improvement to bus services
- Co-location of homes, businesses and services are also an essential part of bringing about a move away from car use.
- Impacts will be on the environment, where car travel is not reduced there may be worsening health and climate impacts, as well as socially detrimental impacts of congestion.

- New roads and road improvements should include suitable provision for buses and segregated safe routes for pedestrians and cyclists.

### PLA8 – Development led improvements to the transportation network

This policy sets out schemes that are directly related to the delivery of development sites.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
•	-	?	?	?	?	?	x	x	-	-	?	?	?	•

#### Sustainability commentary

These schemes are all road improvements. These improvements are essential to ensure new business areas have good access to the main highway network. However, they will have the detrimental environmental and social impacts related to car use, despite economic benefits. The policy does not give any consideration as to how more sustainable transport facilities could be delivered as part of specific new development, for instance a transport interchange.

#### Main impacts / mitigation / recommendations

- More information needs to be given on how these schemes will be implemented, including how they will be funded from developer contributions of development that is taking place near the proposed routes.
- There are likely to be impacts relating to health, wellbeing and access
- Impacts of new road travel will include environmental effects on air quality and climate, as well as impacts from increased congestion, on health and wellbeing.
- There will be positive impacts related to access for new development.
- New roads and road improvements should include suitable provision for buses and segregated safe routes for pedestrians and cyclists.

**PLA9 – Development affecting Public Rights of Way**

This policy lists the routes where new or upgraded walking and cycling routes will be ‘promoted and encouraged’.

Access	House	Health	Comm	Biod	L’scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
●	-	●	●	?	?	?	●	●	-	-	-	-	?	?

**Sustainability commentary**

Public Rights of Way provide essential walking links between places, playing a role in day to day movement and linking communities as well as part of a wider leisure network. Therefore, protecting these routes can have a positive benefit for health and access related to reducing car use.

**Main impacts / mitigation / recommendations**

- There will be positive benefits of helping to reduce car use.
- More information needs to be given on how these schemes will be implemented, including how they will be funded from developer contributions of development that is taking place near the proposed routes.
- There are likely to be positive impacts relating to health, wellbeing and access
- The policy could state (as in supporting text) that any re-routed Public Right of Way should be of a similar or improved quality and safety and should be a route of the same length. Development that takes place on land with a Public Right of Way should help enhance routes, even if they are not diverted.
- The multi purpose function of these routes could be noted in supporting text as part of the Green Infrastructure Network (policy ENV5).

**PLA10 – Safeguarding of disused railway infrastructure**

This policy prevents former railway routes from being developed in a way that would break up their integrity as transport routes.

Access	House	Health	Comm	Biod	L’scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
●	-	●	?	?	-	-	?	?	-	-	-	-	?	?

**Sustainability commentary**

This policy is positive for sustainable development as these routes can be a valuable transport resource. The engineering of these routes makes them suitable for a variety of alternative uses, such as reinstated rail routes, trams, guided bus-ways, cycling and walking routes, that would be expensive to replace if lost through inappropriately sited development. Routes can also be an important wildlife feature, with embankments and cuttings of abandoned railway providing habitats and movement routes for wildlife.

**Main impacts / mitigation / recommendations**

- This is a clear policy that should help protect these routes with a positive impact for sustainable development.

**PLA11 –Parking Standards**

Parking standards will be prepared to ensure the right levels of parking are provided associated with new development.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
•	-	?	?	-	-	-	?	?	-	-	-	-	?	?

**Sustainability commentary**

Control of parking can be one of the tools to helping reduce car travel and associated benefits. Limiting the number of car parking spaces can encourage more people to travel by car alternatives. Locations where parking should be limited are in town centre locations that have good access by public transport and are in a walkable distance from residential areas. Also, higher trip generating uses should have limited parking, such as office development. Using maximum car parking standards can be used to manage parking. However, associated improvements to public transport will be necessary to help prevent a loss of business to town centres and not to discourage inward investment.

**Main impacts / mitigation / recommendations**

- Parking controls need to be implemented alongside other strategies for improving access to jobs and services by public transport, walking and cycling, including better public information on alternatives.

## PROTECTING AND ENHANCING THE ENVIRONMENT

<b>SP4 – Conservation and enhancement of the natural environment</b>		
<b>Policy Summary:</b>		
The intention of this policy is to protect and enhance the natural environment through the appropriate control of development.		
Accessibility	-	This policy does not directly relate to meeting this objective.
Housing	-	This policy does not directly relate to meeting this objective.
Health, safety and security	?	Protecting and enhancing the natural environment should have benefits for health, this will include protecting areas for outdoor recreation. Also, health benefits can be attributed to having a high quality living environment and access to greenspace.
Community	?	There can be benefits to communities from conservation of the natural environment. The natural environment and its relationship to the urban area can be an important part of local character, for instance in valley or coastal communities. Therefore, protecting the quality of the area can help community pride, as well as providing space for outdoor recreation, helping people connect with their local environment. Integrating open space into development can also enhance living environments, and in combination with other strategies help promote community initiatives for renewal.
Biodiversity	●	This policy specifically relates to meeting this objective, and should help deliver positive outcomes. It may be possible to include wording in the policies to ensure 'no net loss of biodiversity' on any development site, which should help ensure new development, wherever it is located, takes into account the current biodiversity resource as part of development proposals.
Landscape	?	This policy relates to meeting this objective, and should help deliver positive outcomes. However, it could be improved by an explicit reference to protecting and enhancing landscape character.
Built environment	?	Retaining open space and ecological features in built-up areas can be an essential part of their character and quality. This includes retaining large trees, hedge-lines and natural landscaping. To recognise the importance of ecological diversity in the urban environment could be specifically referred to in this policy.
Air	?	The policy does include a criteria to protect air quality, although it does not necessarily state how this will be implemented. Other policies in the LDP that lead to increased car or HGV movements may have an inevitable

		adverse impact, in conflict with this policy.
Climate change	?	Changes in the climate may have an impact on the natural environment of the County Borough. It therefore may be suitable for the policy to specifically recognise this, for example, by including policy criteria to protect the linkages between habitats that allow for species migration, such as hedges, ponds and groups of trees.
Water	?	The policy includes the criteria to protect the quality of water, with potential positive benefits for water quality. However, it may be that this will need to be implemented through another policy on sewerage infrastructure, or by other means such as discharge licensing. As although a good intention for sustainable development, it is not clear how the policy will be implemented.
Land/Soil	?	The policy could refer specifically to the protection of soil as part of the natural environment.
Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	-	This policy does not directly relate to this sustainability objective.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	?	Retaining a high quality natural environment is essential in making the County Borough a location where business want to locate, and will help provide the workforce with a good quality of life.

### **Sustainability Summary**

Overall, this policy is likely to help in meeting sustainability objectives related to the protection of the natural environment, specifically biodiversity. The policy is clear that development will not be permitted where there are adverse impacts on these features, and this is supported in terms of achieving sustainable development as it reduces ambiguity in implementation. For some issues, such as water and air pollution the policy gives little information on how this will be implemented in making decision on planning applications.

The policy does put greatest emphasis on continued protection of designated features the importance of the wider natural environment should also be stipulated in policy.

**Main impacts**

The impacts of this policy are likely to be positive in terms of environmental sustainability, with potential benefits also for social and economic objectives.

**Recommendations and mitigation**

- The connections between bringing natural environment features and areas of open space managed for wildlife and improving local communities could be recognised through policy, with the importance of biodiversity enhancement as part of large development schemes.
- It will be necessary to deliver some aspects of the policy in combination with the other plans and strategies for the area.

**ENV1 – Development in the Countryside**

This policy sets out when development will be permitted in the countryside beyond development boundaries.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	-	?	?	?	?	?	-	-	?	-	-	?	?

**Sustainability commentary**

This policy sets out the controls to protect the open countryside from development. Only development that requires a location beyond the urban boundaries will be permitted. Permitted types of development include economic development that needs a countryside location, transport infrastructure and agricultural buildings. All development will need to comply with the other policies of the plan.

Permitting Gypsy and Traveller accommodation outside development boundaries will help in providing sites for these communities, although these sites should still have access to essential services.

**Main impacts / mitigation / recommendations**

- This policy should help protect the countryside from inappropriate development. This may help protect landscape quality, biodiversity assets and make the best use of land.
- Some types of development in the countryside may have a greater impact than others, such as mineral workings and new roads.
- Development permitted in the countryside will need to be implemented in line with other local and national policy.

### ENV2 – Development in Green Wedges

The proposals map includes Green Wedges where development will be restricted to help protect ‘openness’ preventing settlements from joining up.

Access	House	Health	Comm	Biod	L’scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	-	?	?	?	?	?	-	-	?	-	-	?	?

#### Sustainability commentary

Protecting these areas will help protect the individual identity of settlements. Green Wedges are not an environmental quality designation, therefore protecting these areas of land will not necessarily have landscape and biodiversity benefits. Preventing development in these locations may mean development is displaced into more sensitive locations, or locations that are further from urban edges and therefore less accessible by walking, cycling or public transport. Coalescence of settlements will not necessarily have any negative sustainability implications, particularly where residents already share the services on offer.

#### Main impacts / mitigation / recommendations

- Policy may protect the individual character of settlements.
- Care needs to be taken that implementing this policy does not result in development being displaced to more sensitive locations and cause harm to landscape or biodiversity assets.

### ENV3 – Special Landscape Areas

These policies relate to the protection of areas of high landscape quality within the County Borough. This includes the nationally designated Heritage Coast as well as the locally identified Special Landscape Areas.

Access	House	Health	Comm	Biod	L’scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	?	?	●	●	-	-	-	-	?	-	-	-	?

#### Sustainability commentary

The landscape quality of parts of the County Borough is a substantial asset for the area. These landscapes are a valuable resource for quality of

life as well as helping the economy of the area, through supporting tourism and maintain the area as an attractive place to do business. High quality landscapes often have a multifunctional role and therefore their protection can have a range of sustainability benefits. Positive sustainability benefits of open space can include: protection of biodiversity assets such as hedgerows, trees, woodland and ponds; as open space for recreation; protecting the historic and cultural identity of an area.

The policy also should help ensure the urban fringe is considered in planning proposals and the transition from rural to urban is an attractive one, enhancing both the character of the built and natural environment.

**Main impacts / mitigation / recommendations**

- The multi-purpose use of these spaces could be recognised, with the specific features that need protecting identified in policy or supporting guidance.

**ENV4 – Local / Regional Nature conservation sites**

This policy covers the protection of locally designated nature conservation sites, subject to certain exceptions.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	-	-	●	?	-	-	-	?	-	-	-	-	-

**Sustainability commentary**

This policy sets the protection of local nature conservation designations. This may help the protection of this type of site from inappropriate development. However, it could be expanded to include enhancement of these sites in association with adjacent new development. In particular Local Nature Reserves are locations where the public's understanding of the natural environment should be promoted. Therefore, new residential development can help improve access and information on these sites to promote understanding.

**Main impacts / mitigation / recommendations**

- None

**ENV5 – Green infrastructure**

The policy sets out the principles behind protecting and enhancing green infrastructure.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	?	?	•	•	?	?	?	?	-	-	-	-	?

### Sustainability commentary

Protecting the natural assets of the County Borough's environment, wherever they are found, is an important aspect of delivering environmentally sustainable development. Of particular importance, and recognised in the policy, is protecting a network of green spaces in the borough that form a multifunctional role. These include disused railways, hedges, footpaths and river corridors, as well as individual features such as large trees and ponds. These links can have a role in nature conservation protection, supporting walking and cycling, as part of the built environment character and as 'green lungs' for urban areas.

### Main impacts / mitigation / recommendations

- The policy should have a positive impact on protecting features of environmental sustainability.
- The importance of individual features, such as ponds and veteran trees can also be an important component of a Green Infrastructure network
- The policy could be combined with other policies on protection of nature conservation, especially ENV6 which covers the same issues, although in a slightly different way. ENV4 on locally designated nature conservation sites could be part of the green infrastructure network.
- The Green Infrastructure Supplementary Planning Guidance to be prepared for the County Borough will help identify the existing network and indicate areas of enhancement, helping to deliver the policy.

### ENV6 – Nature conservation

This policy sets out the criteria to be used to protect the nature conservation value of the County Borough wherever it is found.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	?	?	•	?	?	?	?	?	-	-	-	-	?

**Sustainability commentary**

Protecting the features listed in the policy can have substantial benefits for nature conservation. A rich diversity of wildlife is not only found on greenfield sites. Well planned urban sites can have an equal or greater diversity if natural features are created or retained, which can contain a greater range of species. This policy sets the provision for important natural features to be retained through development, such as tree, hedges and ponds. Therefore, the policy has a positive relationship with biodiversity protection and may have other benefits, such as helping protect the natural landscape and built environment form, protection from climate change impacts and creating an attractive place to live and work.

**Main impacts / mitigation / recommendations**

- It may better reflect the importance of nature conservation protection to refer to ‘assets’ rather than ‘resources’.

**ENV7 – Natural resource protection and public health**

This wide-ranging policy covers various topics relating to preventing pollution and harmful impacts.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	•	?	?	-	-	•	?	•	•	-	-	-	-

**Sustainability commentary**

Protection of people and wildlife from harmful pollution impacts is essential to ensuring sustainable development. This policy covers a range of potential pollution impacts and the need to prevent new development causing harm or further harm. This policy may be difficult to implement as it not very specific about how the harm may arise, such as the locations where there may be risks from poor air quality and land stability.

The impacts of pollution on biodiversity could also be a consideration of this policy. For instance deterioration of air or water quality has the potential to have an impact on designated sites of nature conservation importance, including international sites such as the Blackmill Woodland Special Area of Conservation.

The policy may have an impact on delivery of some types of development on land where previous activities have caused contamination.

**Main impacts / mitigation / recommendations**

- This policy is quite wide-ranging and may be difficult to enforce.
- The policy could include the need to protect sensitive habitats and species from pollution impacts, not only people
- Mitigation will also be through compliance with Natural Resources Wales licensing of harmful activities, where relevant.

<b>SP5 – Conservation of the built and historic environment</b>		
<b>Policy Summary:</b> This policy aims to prevent new development adversely affecting the built and historic environment, including built development and historic landscapes, parks and gardens.		
Accessibility	-	This policy does not directly relate to this sustainability objective.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	?	By protecting and enhancing the environment it may be possible to give people greater pride in the place where they live, with possible benefits for wellbeing and avoiding anti-social behaviour.
Community	●	Built environment and landscape features can be essential in maintaining the unique character of communities and attachment people feel to the place where they live. Therefore protecting, and where necessary enhancing, these features will be important in retaining community character.
Biodiversity	?	Many historic landscape features, including woods, hedges, field barns, and ponds can provide habitats for a diverse range of species. Where historic landscapes are protected and enhanced this should be of benefit to biodiversity, although this will depend on the features being protected.
Landscape	●	Protecting historic landscape, parks and gardens should help maintain and enhance the character of the landscape.
Built environment	●	This policy should directly help in meeting this sustainability objective. The policy could be more clear in its wording that development that would harm the identified built or historic features would not be permitted, rather that development that would cause harm 'would be favoured'.
Air	-	This policy does not directly relate to this sustainability objective.
Climate change	?	Climate change can result in more extreme weather impacting on the integrity of buildings (increased storm events, extended periods of high temperatures), and longer dry periods can dry soil and have impacts on buried archaeology. Therefore it will be important to recognise the potential adverse impacts of a changing climate on the historic

		environment in policy or supporting text
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	-	This policy does not directly relate to this sustainability objective.
Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	-	This policy does not directly relate to this sustainability objective.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	?	Retaining a high quality environment is essential in making the County Borough a location where business want to locate, and will help provide the workforce with a good quality of life.
<p><b>Sustainability Summary</b></p> <p>Overall this policy is likely to help meet sustainability objectives related to the protection of the built environment. The policy is clear that development will not be permitted where there are adverse impacts on these features, and this is supported in terms of achieving sustainable development as it reduces ambiguity in implementation.</p>		
<p><b>Main impacts</b></p> <p>The impacts of this policy are likely to be positive in terms of protecting the quality of the built environment. This can help meet sustainability objectives relating to the built environment, as well as maintaining a sense of place and peoples' connecting to the place where they live.</p>		
<p><b>Recommendations and mitigation</b></p> <ul style="list-style-type: none"> <li>• The policy could refer also to the importance of protecting archaeological resources, they are covered by other policies of this section.</li> </ul>		

**ENV8 – Heritage assets and regeneration**

This policy sets out that development that conserve and enhances local distinctiveness will be favoured.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	-	?	-	?	●	-	-	-	-	-	-	-	?

**Sustainability commentary**

This policy may have a positive impact on the design of new development to ensure that it fits with its local context and heritage features. However, some changes in wording may help ensure that this policy can be enforced for all new development.

Features of recognised national or local importance for heritage can play an important role in community identity and people's pride in the place where they live. A high quality built environment, including heritage features, can also make an area attractive for investors, including economic development and tourism. Therefore, protecting heritage and historic features of the environment can be an essential part of securing sustainable development as they are frequently a finite asset to the area.

**Main impacts / mitigation / recommendations**

- The Supplementary Planning Document on Design and Sustainable Place Making should help ensure new development is built to high quality standards to complement existing built heritage features.

**SP6 – Minerals**

**Policy Summary:**

This policy sets out the objectives for the supply of aggregates and coal in the County Borough over the plan period. It also includes the need to manage the use of the existing supply to ensure that it is treated as efficiently as possible.

Accessibility	-	This policy does not directly relate to this sustainability objective.
Housing	?	There is the risk that safeguarding of land means that housing cannot be delivered in the locations where there has been an identified need.
Health, safety and security	-	This policy does not directly relate to this sustainability objective.

Community	-	This policy does not directly relate to this sustainability objective.
Biodiversity	?	<p>Depending on the location of the safeguarded land this policy could also help in protecting the nature conservation value of a site. However, this safeguarding would be under the expectation that the mineral is eventually extracted therefore this would not be long term protection. Also, there is the risk that safeguarding land can deflect development to areas that are more sensitive in terms of nature conservation value.</p> <p>Some sites for mineral abstraction are very close to SACs, therefore policy will need to be place to ensure new workings take direct and indirect impacts fully into account. This will relate to direct land take and the possibility of changes in the water table indirectly impacting on sites.</p> <p>This, or other policies of the plan, should address the issue of marine dredging and the impact this may have on nature conservation. This includes impacts on the internationally designated sites of the Bristol Channel and Severn Estuary, such as the Kenfig SAC.</p>
Landscape	?	Depending on the location of the safeguarded land, this policy could also help in protecting the landscape character of the site in the short term. However, this safeguarding would be under the expectation that the mineral is eventually extracted therefore this would not be long term protection. Also, there is the risk that safeguarding land can deflect development to areas that are more sensitive in terms of landscape character.
Built environment	-	This policy does not directly relate to this sustainability objective.
Air	-	This policy does not directly relate to this sustainability objective.
Climate change	-	This policy does not directly relate to this sustainability objective.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	?	This policy places restrictions on the use of some land. There is the risk that safeguarding land can deflect development to areas that have higher quality soil.
Minerals and waste	●	This policy aims for the more efficient use of mineral resources, through protecting them from sterilisation by inappropriately located development and aiming for their more efficient use by prioritising use of secondary aggregates.

Renewable energy	?	This policy does not directly relate to renewable energy generation, and includes provision for extraction of a non-renewable energy resource: coal.
Employment	●	Maintaining mineral supplies may give employment opportunities in the future.
Wealth creation	●	Mineral resource in the County Borough is an important economic asset.
<p><b>Sustainability Summary</b></p> <p>Protecting the existing aggregate and coal landbanks and areas of resources is essential to ensure these minerals supplies are not wasted simply through inappropriately located development. There is no truly sustainable way to use primary resources, as they are finite. However, seeking to control their extraction by making use of secondary resources in preference to primary is essential, for making best use of this resource.</p> <p>The policy could contain greater detail on how it is to promote the use of alternative materials, secondary aggregates and efficient use of aggregates, or the tests that will be applied to verify this.</p> <p>Safeguarding land could have an impact on other sustainability objectives as it may prevent development coming forward in sustainably accessible locations, for example on sites on the edge of urban areas that could contribute to housing and employment.</p> <p>The policy is not clear on how planning applications for sand and gravel dredging from the Bristol Channel will be dealt with. There is the potential for dredging to have serious deleterious impact on the nature conservation value of sites in and around the Bristol Channel and Severn Estuary.</p>		
<p><b>Main impacts</b></p> <p>The impacts of this type of policy in terms of sustainability are difficult to identify with certainty, as they encourage the eventual use of a finite resource, albeit aiming for it most efficient use. Therefore, there will be impacts on maintaining the stock of minerals. There may be impacts of protecting land for minerals abstraction that could potentially be sites that are well suited to other types of development, such as accessible housing and employment.</p> <p>There may also be nature conservation impacts depending on the how marine dredged sand and gravel are handled.</p>		
<p><b>Recommendations and mitigation</b></p> <ul style="list-style-type: none"> <li>• The policy should clarify the control of marine dredging to protect nature conservation areas in and around the Bristol Channel and Severn Estuary, including the Kenfig SAC in the County Borough.</li> </ul>		

- New minerals development must take into account direct and indirect impacts of operation on SAC sites, which will include the need to protect sites beyond SAC boundaries necessary for maintaining SAC integrity.

### ENV9 – Development in minerals safeguarding areas

This policy sets the criteria to protect minerals from sterilisation through inappropriately located development.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	?	-	-	?	?	-	-	-	-	-	●	-	-	?

#### Sustainability commentary

There is no truly sustainable way of managing minerals resources, as they are only being protected until they are eventually exploited. However, protecting the identified minerals and aggregate resource areas from development will help retain this resource until it is required in the longer term. There may be a risk that protecting mineral resources that have little likelihood of every being required may prevent the natural expansion of settlements, with impacts on access and reducing car use. Restricting development on protected minerals safeguarding areas and aggregate sites also risks development being displaced onto more sensitive environments, such as those with nature conservation or landscape significance.

#### Main impacts / mitigation / recommendations

- Safeguarding of minerals resources could be judged against the need to protect other environmental assets from the adverse impacts of development.

### ENV10 – Development within Buffer Zones

This policy sets out part of the policy relating to buffer zones around minerals sites.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	●	-	●	-	-	-	-	-	-	?	-	-	?

#### Sustainability commentary

This policy is similar to the provision of the strategic policy 7. However, the strategic policy is more restrictive of development in these buffer zones for reasons of residential amenity and protection of nature conservation assets. The two policies should be combined to ensure that appropriate controls are put on development in these buffers, to protect the wellbeing of people and wildlife habitats.

#### Main impacts / mitigation / recommendations

- Could be combined within policy SP6

### ENV11 – Mineral development

This policy sets the criteria that will be used to assess development proposals for mineral abstraction.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	?	?	?	?	-	?	-	?	?	?	?	-	-

#### Sustainability commentary

Mineral abstraction has the potential to have significant adverse impacts on the natural environment, health and amenity. The policy sets out the general principles that new minerals development will have to comply with, although this is supported by national policy on minerals abstraction. This type of application may also require an Environmental Impact Assessment and operational licenses, all of which may help mitigate adverse impacts. Care needs to be taken to ensure that minerals applications do not cause cumulative harm on any particular community or environmental asset. Therefore, the policy may need to include some consideration of cumulative harm of multiple extraction sites.

The policy does include a criteria on after-use of sites. To ensure a long-term positive use for the site it may be preferable to put more detail on

what would be expected from applications. This could include phased plans for restoration.

Mineral abstraction will not be sustainable in the long-term.

**Main impacts / mitigation / recommendations**

- Impacts of mineral development can be mitigated in part through appropriate after use and restoration proposals.
- The potential for cumulative harm should be addressed through the policy.

**ENV12 – Coal extraction operations**

The policy sets out where coal extraction will not be acceptable, including 500m of settlement boundaries and protected nature conservation sites.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	?	?	?	?	-	-	-	-	-	?	-	-	?

**Sustainability commentary**

The policy should help in protect the natural environmental and residential amenity from the harmful effects of coal extraction. Consideration should also be given to all aspects of the natural environment, including landscapes and important nature conservation sites.

The policy also sets out that coal exaction could take place under certain circumstances.

**Main impacts / mitigation / recommendations**

- Careful consideration and controls on site specific proposals will be one of the ways that impacts of this type of development will be mitigated against.

<b>ENV13 – Unstable land</b>														
This policy sets out the controls for development on known unstable sites.														
Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	●	?	-	-	-	-	-	-	?	-	-	-	-
<b>Sustainability commentary</b>														
This policy should help protect health and wellbeing as well as property, by ensuring development is not built where there is risk of landslip or other instability.														
<b>Main impacts / mitigation / recommendations</b>														
<ul style="list-style-type: none"> <li>• None</li> </ul>														

<b>SP7 – Waste management</b>		
<b>Policy Summary:</b>		
The policy sets out the specific sites that are preferred for new waste treatment facilities, and that other industrial sites will also be suitable.		
Accessibility	?	Provision of new waste treatment sites should help allow waste to be managed close to its source.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	?	Locating new waste treatment sites must take into account the proximity to residential development and other sensitive uses. This is to protect from potential adverse impacts on residents well-being, such as operational noise, odour and litter.
Community	-	This policy does not directly relate to this sustainability objective.

Biodiversity	?	There is a potential risk to nature conservation from the proposed locations of new waste development. This includes development at Brynmenyn Industrial Estate in Bridgend, near the Blackmill Woodland SAC, and Heol-y-Splott in South Cornelly and Village Farm in Pyle that are near the Cefn Cribwr Grassland and Kenfig SACs. Exact impacts may depend on the type of facility proposed, and could be in terms of air quality or water availability/quality.
Landscape	?	Depending on the type of facility there may be landscape impacts, such as visual impacts of large new buildings.
Built environment	-	These sites will be developed in industrial areas and therefore are unlikely to have impacts on areas of quality built development.
Air	?/●	There is the potential for new waste management sites to have an impact on air quality, although this will depend on management and type. For instance, facilities that involve burning could have polluting emissions and some sites could have odour impacts. Reducing waste to landfill through recycling and reuse can also reduce methane emissions that contribute to climate change.
Climate change	-	This policy does not directly relate to this sustainability objective.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	●	Reducing waste to landfill through recycling and reuse can also reduce land required for landfill.
Minerals and waste	●	This policy should help promote the better management of waste and therefore reduce the use of primary materials, therefore helping to protect natural resources.
Renewable energy	?	Final disposal of some waste can include energy recovery, although this is not truly a renewable resource.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	-	This policy does not directly relate to this sustainability objective.

### Sustainability Summary

The sustainable management of waste is essential to make the best use of natural resources and avoid final disposal to landfill of as much waste as possible. New waste facilities also need to be located near the sources of waste to reduce the need to transport waste long distances. This policy should help promote the better management of waste by locating new facilities in the County Borough. Additional information on the type of facility that is needed could be specified in the policy to help deliver the required treatment.

### Main impacts

There should be benefits of this policy in achieving the more sustainable management of waste, with positive benefits against minerals and waste sustainability objectives, as well as reducing land needed for landfill.

Depending on the type of site and management there is the potential for adverse impacts on air quality, landscape and other environmental assets and resources. This includes possible impacts on the internationally protected nature conservation sites, including Blackmill Woodlands and Kenfig SACs.

### Recommendations and mitigation

- All such facilities need to have management conditions as part of planning permissions, to ensure they are run in a way that does not harm local amenity, cause adverse impacts on the wellbeing of local people and protect the natural environment, including direct and indirect impacts on internationally designated nature conservation sites.

### ENV14 – Inert waste

This policy relates specifically to the development of inert waste sites in the countryside. The policy sets criteria for determining the suitability of this type of site.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	-	?	?	?	?	?	-	?	?	?	-	-	-

### Sustainability commentary

This policy should help manage the disposal of inert waste, to ensure it does not harm the receiving environment. To further manage the disposal of this type of waste it may be suitable for the policy to be more specific on the what would be the appropriate volume of new landfill sites. For instance, if it is only suitable for small amounts of locally arising waste. The policy may also need to ensure that these disposal sites can be easily accessed by suitable vehicles and it would not cause inappropriate increase in traffic on rural roads. In addition, to help reduce transport these

sites should be located as near as possible to where waste arises, as inert wastes are likely to be heavy and bulky resulting in a large amount of lorry movements. Other impacts, such as those on the landscape and biodiversity will depend on the location of these facilities, with long-term effects determined by long-term restoration plans.

**Main impacts / mitigation / recommendations**

- The policy should include criteria to ensure these disposal sites are of a suitable size, therefore more likely to be used for near sources of waste arising.
- Sites should be on main road routes where possible, to avoid heavy vehicles on smaller rural roads. This may need to be stipulated as policy to ensure it is taken into account at application stage.

**ENV15 – Waste management in new development**

This policy supports the reuse and recycling of waste created during construction.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	-	-	-	-	-	-	-	-	-	●	-	-	-

**Sustainability commentary**

Construction sites, especially those that include demolition and earthworks, can produce a large amount of waste. Reducing the waste that is sent to final disposal is essential and part of combating this will be through being able to store reusable and recyclable materials until it can be used either on or off site. The planning of construction to avoid waste arising is also an essential part of reducing waste.

**Main impacts / mitigation / recommendations**

- The policy should make it clear if it also refers to waste arising during operation of the site, for example recycling bin storage areas.
- Larger sites could prepare a site environmental management plan to include how to tackle waste arising, as well as other environmental control measures to reduce impact of construction.

**ENV16 – Commercial and industrial waste**

This policy relates to the location of commercial and industrial waste facilities.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	?	?	?	?	-	?	?	?	-	?	?	-	-

**Sustainability commentary**

This policy sets the criteria for waste management from commercial and industrial waste. The policy should help make sure that this type of development does not harm residential amenity or the water environment. The policy should be clear that final disposal or incineration without heat capture will not be permitted. Opportunities to create heat and/or power for district or decentralised use should be taken for all waste streams. Some impacts, such as those on biodiversity and landscape will depend on the location of these facilities.

**Main impacts / mitigation / recommendations**

- Final disposal waste can provide benefits for sustainable energy generation using modern technology to generate power as well as district heat supply.
- There may be potential for some types of waste management facility (including MBT) to be used to generate energy as part of decentralised energy provision. These types of facilities can be quite small scale and therefore accommodated within predominantly residential areas rather than on industrial estates. Therefore, the policy should not automatically be assumed to have to be in industrial estates.

<b>SP8 – Energy generation and conservation</b>		
<b>Policy Summary:</b>		
This policy states that development will be favoured that will help meet national renewable energy and energy efficiency targets.		
Accessibility	-	This policy does not directly relate to this sustainability objective.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	-	This policy does not directly relate to this sustainability objective.
Community	-	This policy does not directly relate to this sustainability objective.
Biodiversity	?	There may be the potential for adverse impacts on biodiversity in the local area from this policy, depending on the type and location of energy scheme.
Landscape	?	There is the potential for a landscape impact from large scale new wind turbine development, however this can be minimised with proper siting of new schemes.
Built environment	?	Small scale renewable energy technologies in new development can have an impact on the historic and distinctive built environment.
Air	●	Increasing energy generated from renewable sources will reduce emissions associated with the burning of fossil fuels. This will include carbon dioxide, and sulphur and nitrogen oxides, helping to improve air quality both locally and globally.
Climate change	●	Increasing the energy efficiency of new homes can help reduce energy consumption.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	-	This policy does not directly relate to this sustainability objective.

Minerals and waste	●	Generating energy from renewable resources will help consumption of fuel minerals.
Renewable energy	●	This policy is focused on renewable energy generation, although there is scope for the requirements of the policy to be more tightly worded to maximise these benefits.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	-	This policy does not directly relate to this sustainability objective.

### Sustainability Summary

Securing more energy generation from renewable resources is essential in delivering sustainable development, in order to reduce dependence on the diminishing fossil fuel reserves and to reduce carbon dioxide emissions that contribute to climate change.

However, the policy could be strengthened in order to better deliver more energy efficient development and more on-site energy generation. This could include micro-generation renewable energy technology using ground sources for heat, solar panels for hot water and electricity, and small wind turbines. This could also include energy efficiency technologies such as combined heat and power or community heat and power schemes.

### Main impacts

This policy should help to reduce reliance on non-renewable energy sources, essential for sustainable development. However, the policy wording should be improved to better support renewable and low carbon generation. The policy needs to ensure the full long-term implications of this type of development are taken into account, with potential benefits to society matched against local or temporary concerns.

There may be some landscape impacts from large scale renewable energy generation from wind power.

### Recommendations and mitigation

- The implementation of the renewable energy proposals will be through ENV17 and ENV18.

### ENV17 – Renewable Energy and Low / Zero Carbon Technology

This policy sets the expectations of renewable and low carbon energy generation on larger development sites in the County Borough. The policy

also identifies three sites which will be safeguarded for renewable energy generation.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	-	-	?	?	-	●	?	-	-	●	●	?	●

### Sustainability commentary

This is a positive policy addressing one of the main concerns of a sustainable future – a sustainable energy supply. Requiring larger development sites wherever possible to generate some energy (power and heat) on site will help reduce reliance on fossil fuels, helping the County Borough play a part in mitigating climate change (air), helping prevent against the impacts of fuel price rise, and potentially providing cheaper energy.

Safeguarding the sites for renewable energy generation is supported in making use of the gas bi-products from landfill and waste water treatment. Biomass sites should prioritise energy from waste products, rather than specially grown fuels such as biomass.

The Energy Opportunities Plan should help in securing more energy from renewable sources.

### Main impacts / mitigation / recommendations

- The Council's Energy Opportunities Plan should identify strategic development sites where it is clear that renewable and low carbon technologies would be a real and viable option, potentially making this a requirement of any development proposals.
- Include targets, thresholds and standards for delivering more on-site renewable energy generation. This could include setting Code for Sustainable Home targets, or the proportion of energy use on larger sites that should come from renewable resources.

## ENV18 – Renewable Energy Developments

This policy sets out the control criteria for renewable energy development.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	-	-	?	?	?	-	?	?	?	-	?	-	?

### Sustainability commentary

This is intended to make sure that new renewable energy development does not harm the receiving environment or local amenity. The policy sets out quite an extensive list of restrictions on local energy generation technologies. However, there is a significant need to deliver lower carbon energy associated with new development, not only to help mitigate against climate change, but also to help reduce consumption of finite fossil

fuels. The policy therefore could be more positive on delivering lower carbon energy.

New large scale on-shore wind energy development will be directed under the refined Strategic Search Area. The LDP should be supportive of this type of development, only refusing permission where there are significant adverse impacts likely, as the SSA sites are already deemed suitable for large scale wind energy generation.

**Main impacts / mitigation / recommendations**

- The policy could be combined with ENV17.

## TO SPREAD PROSPERITY AND OPPORTUNITY THROUGH REGENERATION

<b>SP9 – Employment and the economy</b>		
<b>Policy Summary:</b>		
This policy sets out the strategic employment sites that will be protected for business, industrial and distribution employment uses. The policy lists the sites, but sets no criteria for judging potential additional sites. Preferred uses for strategic sites are given and there is a requirement that they are delivered according to site masterplans/development briefs.		
Accessibility	?	These sites have existing connections to the large towns in the County Borough, so maintaining employment in these locations will be beneficial for local residents. However, all these sites are located in the southern part of the County Borough, meaning they are a long way from the Valley Communities and therefore are very unlikely to help meet the employment needs of these communities and others in the northern area.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	?	New employment sites, particularly those including industrial process, will have to be managed and licensed in a way that ensures there are no adverse impacts on the wellbeing of local communities. Some of the strategic sites are in locations that already have a large amount of industrial and other business development. It will be necessary to avoid some communities in the County Borough becoming unfairly harmed by the impacts of large scale employment development near their homes.
Community	?	<p>There is the potential for adverse impacts on residential amenity of communities from the scale of employment development proposed. Adverse impacts may come from the type of industry proposed, vehicle movements, and pollution effects (air, noise, odour, light). Some communities may also be disproportionately impacted by being in the vicinity of a large scale or several employment areas. To avoid impacts sites will need careful layout and design, including landscaping and positioning of buildings. Also, where the potential for cumulative harm on residents may need to be a consideration of planning decisions.</p> <p>There may also be positive impacts on communities from encouraging jobs into areas. Access to employment is essential for community wellbeing, and the investment it encourages can have knock on impacts on town and village regeneration.</p>
Biodiversity	?	The development of greenfield sites for employment has the potential to have adverse impacts on biodiversity. Therefore the existing nature conservation value of the site will have to be taken into account in planning decisions, and the design and layout of sites to protect features in-situ where possible. Development in proximity to

		internationally designated SAC nature conservation sites will need to take into account potential harm to these sites, this includes development at Island Farm in Bridgend and Ty Draw Farm in North Cornelly.
Landscape	?	There is the potential for the development of greenfield sites to have an impact on local landscape character. Therefore, this will need to be taken into account in the design and layout of new development.
Built environment	?	New employment development should be designed, where possible, to enhance the area. This will be particularly important in office and business park development, or town centre employment.
Air	?	The strategic employment sites are on urban periphery areas, and therefore, there is the risk that, without high quality viable transport alternatives, this will result in increase car travel with air quality impacts. An increase in distribution businesses in the area may have an inevitable adverse impact on air quality through increased HGVs on the roads, although quick links to the M4 may limit local impacts of town centre congestion.
Climate change	?	Some of the strategic sites are near areas at risk of flood. This will need to be taken into account when considering the suitability of sites for development, and to ensure appropriate flood risk prevention is put in place if necessary.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	?	This policy will require the development of greenfield sites, and therefore see the loss of open land. There is a quantity of large previously developed sites in the County Borough that could accommodate new employment development, however these are not necessarily in the locations needed by new and expanding businesses.
Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	?	It should be ensured that new employment development on a large scale makes use of renewable energy, preferably through on-site generation, including wind turbines and other sources. Any heat produced as part of industrial processes should not be wasted, and either used for heating on site or by nearby development.
Employment	●	This policy should help deliver new employment, although the strategic sites would not necessarily help meet the needs of the wider workforce of the County Borough given that these are located in the M4 corridor only.
Wealth creation	●	This policy should help in wealth creation. The type of use that the sites are reserved for should help support the economy of the County Borough providing high quality employment opportunities.

## **Sustainability Summary**

This policy should help benefit the local economy of Bridgend County Borough, although the strategic sites are focused on the M4 corridor and therefore do not necessarily meet the needs of the wider community. The strategic sites are mainly on greenfield land and therefore their development could have impact on landscape and biodiversity, and may not represent the most efficient use of land. Some communities, particularly to the southeast of Bridgend may be becoming dominated by large industrial parks, therefore care needs to be taken that this does not harm the wellbeing of local residents.

The policy does not refer to the overall land-bank of employment sites that the strategy proposes for development.

The policy does not show how decisions will be made on development of employment land on non-strategic sites, including non-allocated sites, to ensure that they are in line with the spatial strategy.

### **SP9(1) Brocastle, Waterton, Bridgend**

This is a greenfield allocation on a wedge of land that protrudes into the Vale of Glamorgan. Development would result in the loss of this open space, with adverse impact on biodiversity and the soil resource. There is already a substantial employment site to the north of this allocation. The site is suitable for large industrial development as it is not located near any significant housing areas. However, there is an adjacent housing allocation with planning consent and care will need to be taken to avoid harming residential amenity in this location. The site is quite distant from the town centre of Bridgend, although proposed improvements to walking and cycling routes may help non-car access for employees, there is also bus access to the site from central Bridgend although this could be improved. This site is not very suitable for office development given its peripheral location and lack of good quality public transport access. Car travel is likely to be the preferred travel choice to the site for the majority of future employees.

### **SP9(2) Island Farm, Bridgend**

This is a large greenfield sites that will extend the built up area of Bridgend further to the southwest, beyond the A48 (Bridgend bypass). It is not very well linked to the rest of the Bridgend strategic growth area. This site is near the existing technology park although separated by a cul-de-sac of housing. Development will therefore result in the loss of open land with landscape and biodiversity impacts (the site overlaps with a Site of Nature Conservation Importance). This site is well location with the town centre, although still beyond an easy walking distance. Cycle route improvements could help non-car access to the site as would improved bus access. The site contains a listed WWII building and is identified as an 'archaeologically sensitive area' and therefore these considerations will need to be designed into site development. The site is reserved for higher end technology uses.

### **SP9(3) Pencoed Technology Park**

This is a large site partly in Rhondda Cynon Taff, within the Bridgend area the site is largely previously developed but outside it is greenfield. Most of the site in Bridgend is in use already as a technology park. Access to the site is most likely to be easiest by car with direct access of the M4. Therefore, although ideally placed for high tech industry and business the site may not be contributing greatly to the sustainable development of Bridgend. The location means that the site may have a high proportion of employees who travel from outside the County Borough to work here, therefore not directly supporting regeneration and employment needs of Pencoed. The majority of travel to the site is

also likely to be by car, therefore the site does not perform well in helping to reduce car travel, congestion and climate change mitigation. However, cycle and walking access improvements could help local people to choose non-car modes to access the site.

**SP9(4) Ty Draw Farm, North Cornelly**

This is a greenfield site to the east of the existing built up area of the town. The site has good access to the M4 and is likely to be attractive for employment development. Depending on the type of employment and training provided there could be benefits for local deprived communities. The site would result in the loss of greenfield land with possible impacts for biodiversity and landscape. The site is in good proximity to central North Cornelly, although as with other strategic sites the M4 connections may mean many people travel longer distances by car to work at the site. However, cycle and walking access improvements could help local people to choose non-car modes to access the site.

**Main impacts**

There will be positive impacts on providing jobs for some of the County Borough workforce, such as Bridgend, Pencoed and the Cornelly area, and encouraging economic growth.

Strategic sites allocated near internationally designated nature conservation site will have to be developed to avoid impacts on the integrity of these sites, specifically the Kenfig SAC and the Cefn Cribwr Grasslands.

Specific comments on the sites can be found in the appraisal of policy PLA6.

The peripheral locations of these sites will often mean existing public transport access is poor. Therefore, some of these sites will need to be delivered in conjunction with other strategies on public transport improvements to ensure development does not increase car use and exacerbate congestion. All site should have high quality walking and cycling route access.

M4 access to them may mean that car access, with employees possibly travelling long-distances, remains the predominant mode of transport to the site. This is not compatible with sustainability objectives relating to air quality and climate change, as well as national objectives of reducing M4 congestion. Proximity to the M4 may also mean that the economic benefits from the development of several of these sites are not felt by the communities that live in close proximity to them.

**Recommendations and mitigation**

- Other plan policy should help prevent biodiversity and landscape impacts of greenfield development, as well as the risks of flood to new development.
- It may be beneficial to give details of the expected role of town centres, particularly in Bridgend, in helping to providing new employment development. For instance the locations and quantity of new jobs anticipated for these more accessible locations. Town centre locations for office development can be the most sustainable choice, as this type of development creates a lot of commuting trips and should be developed in accessible locations to help reduce car travel.
- For large development sites, design briefs or masterplans could be developed to indicate what new development would be expected to provide. This could include high quality design, energy provision schemes including renewable or district supplies, non-car access, and

biodiversity enhancement. Where sites are part of a larger SRGA regeneration area the design briefs will need to be prepared to ensure development comes forward in a unified way across different allocations.

- Policies on landscape and biodiversity protection need to be implemented to avoid adverse impacts on these assets.
- The peripheral locations will mean these sites will be very visible from the countryside. Industrial development can often be of a very low design of quality, therefore sites should be delivered to respect the urban edge through the design of buildings and careful landscaping
- The potential for these sites to deliver a range of benefits should be set out in the Energy Opportunity Plan. Review of policy to set site specific requirements local lower carbon energy generation will help secure these benefits.

## REG1 – Employment sites

This policy lists all employment land allocations for new sites. There are 18 sites listed, 12 of which are in the Strategic Regeneration Areas.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	?	?	?	?	?	?	?	?	?	?	-	•	•

### Sustainability commentary

Growth in the County Borough is anticipated to be through economic development. The LDP has a very large landbank of allocated sites for employment that are very unlikely to all be developed over the plan period. Some of these sites are the strategic employment locations of SP10 and others are allocated in policies REG1 and REG2. Access to jobs will have an important role to play in delivering a social sustainability. However, it is unlikely that all of the sites will be developed and this may mean development does not come forward in the locations necessary to achieve regeneration. Many businesses will prefer locations on the M4 corridor, leaving larger employment sites in the valleys or other peripheral locations empty. More information needs to be provided on the regeneration areas, on how they will achieve the mix of development anticipated (many employment sites are also identified as mixed use regeneration areas) as well as information on how development will be implemented. To provide certainty to potential investors the LDP needs to show how supporting infrastructure and mixed uses will be delivered, including the likely contributions necessary from developers themselves.

### Bridgend Strategic Regeneration Growth Area

The five new sites allocated here are all for B1, B2 and B8 uses. All of these allocations are outside the town centre. Two of the larger sites are to the south west of the town around the existing Bridgend and Waterton Industrial Estates. These are previously developed sites and are already largely developed for employment uses. The sites have good access to the M4 and at their nearest point are around 500m from the town centre.

Four of the sites are also listed as regeneration areas under PLA3. These are at Brackla Industrial Estate, Parc Afon Ewenni, Coity Sidings and

Litchard Industrial Estate. It is not clear why these are not identified as strategic sites in SP10. More information also needs to be given on how the mix of use will be achieved on these sites, particularly where possible incompatible uses are proposed such as housing. The Brackla site is also constrained by being in an area of archaeological potential. This site also contains greenfield land.

The fifth site is within the urban area alongside the railway tracks. The site presents a good opportunity for an accessible neighbourhood employment area.

Coity Sidings is the only site that is reserved for office use only.

### **Maesteg and Upper Llynfi Valley Strategic Regeneration Growth Area**

Two of these sites are also strategic regeneration areas covered by policy PLA3. They are Coegnant, Carerau and Ewenny Road, Maesteg. The particular sustainability characteristics of these sites are covered in the appraisal of the relevant policy. As with other areas it may be necessary to set out more clearly how the anticipated mix of development will occur. The new site is a previously developed area west of the town centre with existing employment uses. Other sites in this area include a site in central Maesteg and a site in the urban area to the north. These provide accessible and neighbourhood employment and their protection from alternative uses is essential.

### **Porthcawl Strategic Regeneration Growth Area**

All the allocated sites in this growth area are already employment sites. No new employment land is allocated despite it being one of the strategic growth areas. There is an existing site at Pwll y Waun, which is also a PLA3 site. However, the existing sites are all quite small. It is not clear if the quantity of new employment space is commensurate with the needs of the town, or if it is under provision and may lead to increased commuting as residents outweigh available jobs. There is a need for employment in Porthcawl to support year round jobs, as jobs in the tourism economy may be more seasonal and be low paid.

### **Valleys Gateway Strategic Regeneration Growth Area**

The land at Tondu site for employment is part of a mixed use development area. It is quite peripheral to the main residential area, although will contain residential development. Other employment sites include Brymenyn Industrial Estate, part of which is also a mixed use redevelopment area, and peripheral Abergarw Industrial Estate. Many of the allocations are in quite peripheral locations and therefore there need to be strategies in place to reduce car travel.

### **Other areas**

There is quite a significant amount of employment land that is to be delivered outside the chosen spatial strategy. The development of these sites may be helping to keep a balance of jobs and homes in these areas, however, the sites may still need to be justified. Specific sites may also need particular controls over their development, Village Farm is adjacent to an internationally designated nature conservation site and itself overlaps with a locally designed SINC site. It is essential that development and operation of businesses in this area do not harm the site.

Some of these 'other' sites may have particular challenges to delivery, therefore an implementation plan may be necessary to indicate funding pathways. For example sites in the valley communities, such as Penllwyngwent Industrial Estate.

### **Main impacts / mitigation / recommendations**

- Other plan policy should help prevent against biodiversity and landscape impacts of greenfield development, as well as the risks of flood to new development. Some sites are in close proximity to protected nature conservation sites and may need specific controls over their development or the type of use permitted on-site. This will need to be determined on a site-by-site basis.
- To achieve a sustainable spatial strategy it will be important to maximise the potential for new job provision to be matched with local employment need, encouraging settlement self-containment. It is not clear if this strategy will achieve this aim. Some locations, such as the Valley Gateway, may see job provision outstrip the local workforce, and other areas such as Porthcawl there may be insufficient jobs to meet local needs. These conditions may lead to an increase in outcommuting for work, there may be some potential for positive impacts, for instance providing jobs for valley communities. However, there is also the potential for adverse environmental and social impacts relating to inequity of access to jobs, congestion, air pollution and climate change impacts.
- The policy does not give any detail on how these sites should be developed, beyond which use classes would be suitable.
- The potential for decentralised power generation and/or district heat and power through co-location will be investigated through the Energy Opportunities Plan, this may help reduce the energy use on existing and employment sites.
- Details of site delivery and implementation are given in the appendix to the LDP and will be included in the proposed online database.

### REG2 – Protection of identified employment sites

This policy sets out the criteria for protecting employment sites from alternative uses.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	-	?	-	-	-	-	-	-	?	-	-	●	●

#### Sustainability commentary

Land for housing can achieve higher land values than employment land. Therefore, this policy should help protect the local economy and jobs through preventing loss of employment land for alternatives. Other uses on these sites will be permitted, although only where it supports the current use. Several of the employment sites in REG1 are for a mix of uses, therefore alternative uses are permitted in these locations through policy. To ensure sufficient land remains for employment use, a design brief or plan policy should set out the area of the site that is to be delivered to help meet employment needs.

Small local employment sites, particularly in more residential areas, may need to be protected from loss wherever possible as there may be strong pressure for change of use to residential due to higher land values. However, these sites should be protected from alternative uses unless they are having a significant adverse impact on the local environment. This type of neighbourhood site can be important for sustainable communities, providing local employment, local services for communities and can be part of neighbourhood character.

Some of these smaller sites are also not identified through Policies REG1 and 2 and therefore are at greater risk from change of use.

#### Main impacts / mitigation / recommendations

- For the mixed use sites, development briefs or policy should set out the land area anticipated for employment. This will help protect employment uses on these sites.

### REG3 – D2 Class Uses on employment sites

This policy sets out the criteria for protecting employment sites from alternative uses.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	?	?	-	-	-	-	-	-	?	-	-	?	?

**Sustainability commentary**

This policy allows for D2 Class Uses on five identified sites, subject to there being no suitable sites in retail areas and following other criteria. This may help make use of long-term vacant buildings on these industrial estates. As noted in the criteria, it is vital that these uses do not put the employment use of the greater site at risk, and therefore result in a loss of the primary purpose of the site. The policy could contain an additional criteria to ensure that these sites should also have good non-car access.

**Main impacts / mitigation / recommendations**

- None

**REG4 – Former Stormy Down Airfield**

This policy allows temporary use of the airfield for specific green industries.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	-	-	-	-	-	-	?	-	-	-	-	?	●

**Sustainability commentary**

This site has had temporary planning permission for green industries in the past. Continuing this temporary use will allow development of these technologies. It is suitable to restrict the use of this site as it is some distance from any towns or villages and not accessible by public transport. There is a development brief for the site that should help make sure the right kind of development is delivered.

**Main impacts / mitigation / recommendations**

- None

<b>SP10 –Retail and commercial development</b>		
<b>Policy Summary:</b>		
The policy sets out where new commercial and retail development will be permitted. This focuses development of this type in town, district and local neighbourhood centres. The policy also permits new out-of-town retailing if no other preferable site is available and would not adversely impact on other retail centres.		
Accessibility	●	Promoting retail development in the town centres should help improve accessibility as these are often in the most accessible locations to most people, by walking, cycling and public transport.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	?	Supporting local shopping areas is an essential part of allowing people to make healthy lifestyle choices by allowing people to walk to local services. Supporting local food shops can also be part of helping maintain a healthy diet.
Community	●	Reinforcing the role of the town and village centres as the location for retail and commercial uses can help in meeting regeneration objectives, and retaining functioning village centres is essential in maintaining and enhancing communities by providing the focus for village life.
Biodiversity	?	There is potential for impact on biodiversity that will depend on the location and design of this type of development.
Landscape	?	There is potential for impact on landscape that will depend on the location and design of this type of development.
Built environment	●	There is the opportunity for this policy to directly contribute to achieving improved built environments in town and village centres, through promoting high quality design in new detail development. This may particularly be the case in Bridgend with the large amount of new retail development raising the potential for large scale renewal of parts of central Bridgend.
Air	?	There may be positive benefits of promoting more centralised shopping, as these locations are more likely to be accessible to greater numbers by foot, cycle or public transport. This should help in reducing car use, and associated air quality impacts.

Climate change	-	This policy does not directly relate to this sustainability objective.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	?	Promoting retail and commercial development in existing built up areas is likely to mean more efficient use of land compared to developing urban fringe greenfield locations.
Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	-	This policy does not directly relate to this sustainability objective.
Employment	●	Retaining retail jobs in the County Borough is positive, in terms of access to employment.
Wealth creation	●	Improving the retail core of the County Borough, by making Bridgend a higher ranked retail centre, could help retain spending in the area. In addition, new retail development could help improve the image of the area to investors.

### **Sustainability Summary**

The distribution of retail and commercial development, after housing and employment, is strategically important in delivering more sustainable development. Retail and commercial provision can help deliver a spatial distribution that can contribute to sustainability. For instance, through creating central accessible areas that are the focus of a range of services that mean people have to make fewer trips, helping in the regeneration of town centres and providing local services near the places where people live to provide for day-to-day needs.

Out-of-town retail centres will be permitted subject to sequential tests and if it can be shown that they would not harm existing shopping areas. It is essential that this type of development is only permitted in very limited circumstances as these centres do little to contribute to sustainable development. Out-of-town shopping centres are often promote car travel, through their location and design. They are not aimed at meeting local needs, and may be tailored to attract visitors from a wide area, this is not positive for sustainable development as it encourages car travel and associated impacts on air quality, health and climate change.

This policy approach should help in this by promoting development in town centres, concentrating on improving the retail provision of Bridgend town centre, as well as in Porthcawl and Maesteg.

### Main impacts

There are potential positive impacts of this policy in aiding regeneration of town centres, in particular Bridgend, where there is an expectation for a large amount of new retail development. Aiming to protect existing district and local centres is also essential in helping to reduce the need to travel and maintaining the heart of communities.

There may be some impacts that cannot be predicted as the exact location of new retail and commercial development is not set out in this policy, such as the location of new allocations.

### Recommendations and mitigation

- The policy will have to be implemented alongside other policies, or design briefs, to ensure new development is of high design quality and contributes to sustainable development. A town centre masterplan will help ensure this is the case in Bridgend. This is particularly associated with the large development in Bridgend where schemes need to aid the revitalisation of the town centre, provide development that has good access by non-car modes and could also contribute to low and zero carbon development.
- It is essential that the role of district and local centres is not undermined by inappropriately positioned retail development, which has few positive sustainability benefits besides good car access.

### REG5 – Local Retailing and commercial development

This policy clarifies that, where the need arises, local convenience shops will be permitted. The policy sets out the locations where new local shops should be developed to support existing and future residents. Policy criteria also aim to protect existing local retailing from change of use.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
●	-	●	?	-	-	-	-	?	-	-	-	-	-	-

### Sustainability commentary

Supporting local shopping areas is an essential part of allowing people to make healthy lifestyle choices allowing people to walk to local services. Supporting local food shops can also be part of helping maintain a healthy diet. In smaller communities or neighbourhoods local retail areas can provide a hub for the community, with potential benefits for community cohesion. Local shops also help reduce unnecessary car travel. Identifying the sites that need new community services is a positive way of helping these to be delivered, meeting the needs of local communities and providing greater equity in access to services.

**Main impacts / mitigation / recommendations**

- Criteria for determining existing viability of services will need to be clearly set out in order to provide consistent and robust decisions on change of use of existing local services.

**REG6 – Primary shopping areas**

This policy sets the criteria for development in the Primary Shopping Areas identified on the Proposals Map. These are in the three main town centres.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
•	-	?	•	-	-	•	?	?	-	-	-	-	?	?

**Sustainability commentary**

Ensuring that the Primary Shopping Areas of the three main towns remain focused on their retail function can have a variety of benefits relating to sustainable development. These benefits come from the concentration of similar uses in one location that have relatively good access to public transport. Therefore, benefits relate to reducing car use and equitable access. These areas are also the locations that define the character of towns. So ensuring these areas remain vibrant and active is an important part of maintaining and improving the character of the area, helping local people feel proud of the place where they live and helping promote the impact of the area to potential investors.

Active shop frontages also make a place more attractive for walking.

**Main impacts / mitigation / recommendations**

- None

**REG7 – Non A1, A2 and A3 Uses outside of Primary Shopping Areas****REG8 – Exclusion of Uses in Retailing and Commercial Centres****REG9 – Development Sites in Retailing and Commercial Centres**

Policy REG7 and REG8 seek to protect the Retailing and Commercial Centres from non A1, A2 and A3 uses to protect the viability of these areas. Criteria are given for when other uses may be permitted. Policy REG9 lists the allocations for retail and commercial development in the central areas of the Bridgend, Porthcawl and Pencoed.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
●	-	?	?	-	-	●	?	?	-	-	-	-	?	?

**Sustainability commentary**

As with Policy REG6 there is a benefit from concentrating and retaining functional retail centres. The sustainability benefits include maintaining a critical mass of shopping facilities in central areas to support existing shops and services and compete with out-of-town alternatives. This will also help reduce car travel and equitable access as these centres are likely to be accessible by foot, bus and bike to more people. Retaining active ground floor frontages will also help support the built environment character of the central areas, encouraging walking and potentially improving safety.

Policy REG8 also prevents more general industrial uses in the retailing centres. This policy may help retain the character of retailing centres.

**Main impacts / mitigation / recommendations**

- None

**REG10 – Existing retail development outside of retail and commercial centres**

**REG11 – New bulky comparison goods retail development outside of retailing and commercial centres**

These policies set out the nine locations where out-of-centre retail development will be concentrated, which are at six existing sites and three new ones.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	-	?	?	?	-	?	?	-	?	-	-	?	-

**Sustainability commentary**

Retail development in the County Borough will have to comply with national policy on the location of this type of development. However, it is essential to limit out-of-town retail whenever possible, as it has limited benefits for sustainability, predominantly relating to providing jobs benefits to the local economy. Larger out-of-town retailing can have many adverse sustainability impacts, these relate to:

- encouraging driving and longer distance trips by car, with adverse social, health and environmental impacts that car travel and congestion creates
- drawing people away from town centres that can cause a feedback loop of deterioration and customer numbers drop and stores have to close. The failure of local or town centres can have adverse impacts on the communities that they should support.

Three sites are in new mixed use development areas, these will create large new out-of-centre retail areas in the County Borough. Maximising access by sustainable transport modes is essential in these out-of-centre locations, in order to reduce car use and congestion. Development should also be of a scale and type not to harm the character of nearby local shopping centres.

**Main impacts / mitigation / recommendations**

- Parking at out-of-centre retail areas needs to be managed to help town centres and public transport compete with car travel to this type of location.
- The delivery of the new sites needs to be managed to ensure that new retail development delivers benefits for the wider community, integrates well with the proposed mix of employment and residential development. The development will also need to ensure they have attractive, direct and safe access by walking and cycling as well as good bus links.

<b>SP11 - Tourism</b>		
<b>Policy Summary:</b>		
This policy supports tourism development in the County Borough. The policy lists the strategic areas where tourism is expected to aid regeneration, including Porthcawl, the Llynfi Valley Cycle Routes, and Bryngarw Country Park and Garw Valley and Ogmore Valley.		
Accessibility	-	This policy does not directly relate to this sustainability objective.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	?	The policy promotes strategic tourism schemes related to outdoor recreation, which is positive in meeting this sustainability objective.
Community	?	The economic benefits of increasing tourism and tourism spend in parts of the County Borough could help achieve regeneration benefits for communities in the area. Attracting tourists could be key to supporting communities in more remote areas, such as in villages.
Biodiversity	?	Adjacent to the built-up area of Porthcawl are areas of high importance for biodiversity, the Kenfig SAC sites. Therefore, any development in the town will need to ensure this does not adversely impact on the integrity of these sites.
Landscape	?	Development in Porthcawl will need to be designed and located to ensure it does not harm the Heritage Coast.
Built environment	?	New tourism related development will need to be of a high built quality, to protect the high quality natural environment that is the focus for much of the tourism in the area, particularly in the valleys and near the Porthcawl Heritage Coast.
Air	-	This policy does not directly relate to this sustainability objective.
Climate change	-	This policy does not directly relate to this sustainability objective.
Water	-	This policy does not directly relate to this sustainability objective.

Land/Soil	-	This policy does not directly relate to this sustainability objective.
Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	-	This policy does not directly relate to this sustainability objective.
Employment	●	Tourism is an important component of the economy of the County Borough and therefore encouraging higher spend tourism will help support new employment opportunities.
Wealth creation	●	Tourism is an important component of the economy of the County Borough and therefore encouraging higher spend tourism will help support wealth creation.
<p><b>Sustainability Summary</b></p> <p>Tourism is an important part of the economy of the County Borough, although there is potential to increase the amount visitors spend when they visit the area through provision of new facilities and more serviced accommodation. Essential to achieving more sustainable tourism is increasing visitor spend per head, and not simply increasing the number of tourists who spend little in the local area. For example, there needs to be high quality serviced accommodation, more attractions and associated development such as restaurants, shops and cafes. This will help improve wealth creation in the County Borough from tourism but not increase the number of unsustainable car trips.</p> <p>Tourism also has a role to play in delivering regeneration to areas of high quality natural environment but lack of other employment opportunities. This policy helps define strategic areas that need to be the focus of new tourism initiatives, although delivery will need to be in conjunction with other plans and strategies. The policy also encourages high quality tourism accommodation and facilities, although does not proactively set out how these can be delivered.</p>		
<p><b>Main impacts</b></p> <p>There is the potential for positive impacts related to economic regeneration of areas through tourism. Lack of detail in the policy of how these developments will be delivered means that assessing impacts with any certainty is not possible, and this may also impact on delivery of the policy aims.</p>		
<p><b>Recommendations and mitigation</b></p> <ul style="list-style-type: none"> <li>● Care will need to be taken in promoting tourism related development in Porthcawl to ensure it does not harm the integrity of the Kenfig SAC. This could include through additional policy protection.</li> </ul>		

- Care will need to be taken in promoting new tourism development in Porthcawl to protect the landscape character of the Heritage Coast.
- This policy will need to be implemented in conjunction with other plans and strategies for tourism in the County Borough.

### REG12 – New or extended tourist accommodation, facilities and attractions

This policy specifies that new and extended tourist accommodation in the countryside will be permitted where it is part of rural diversification and the use is complimentary with the countryside location. The policy also allocates six sites for new and extended tourist facilities and / or accommodation

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	-	-	-	?	?	-	-	-	-	-	-	●	●

#### Sustainability commentary

Supporting the tourism economy in the County Borough can have benefits for sustainable development. More sustainable tourism will come through encouraging people to stay longer in the area and spend more money. Tourism facilities should also be accessible by bus or train, helping to reduce car use and ensure equity of access. Therefore, it will be important to restrict tourism development in the countryside where it will encourage a large number of trips. This could include larger hotels or leisure destinations. The policy could make clear that access by non-car modes will be essential, with larger developments of this type requiring Green Travel Plans.

The policy also sets out the allocated sites for new or extended tourist facilities. Some of these sites are outside of existing settlements and it is not clear if Design/Development Briefs have been prepared for these areas and travel plans to reduce transport impact where necessary. Development in the countryside presents a greater risk to landscape character and semi-natural biodiversity, therefore careful mitigation through design and management is likely to be essential. It is also not made clear how these allocations have been determined, for instance if they already have entered the planning process or have existing planning consents. The scale of development at each of the allocations must be in keeping with the local character, the level of traffic it would create and the impact new buildings would have on the rural area.

#### Main impacts / mitigation / recommendations

- There will be a need to ensure that where this type of development will generate a large number of trips it is only permitted in locations where there is good access to public transport to ensure that they do not increase car travel.
- The design of new tourism development must be of high quality to enhance the area where it is located. Damage to the character of popular visitor locations by poorly designed new tourism development can leave a legacy of harm to an area.

**REG13 – Protection of existing tourist accommodation**

This policy aims to protect existing tourist accommodation to support the tourism economy of the County Borough.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	-	-	-	-	-	-	-	-	-	-	-	?	•

**Sustainability commentary**

Protecting the number of bed-spaces in the County Borough for tourism accommodation is important in supporting the local economy. A good supply of overnight accommodation will help increase the amount visitors spend when visiting the area and can also be important for business travellers. This policy should be useful in protecting bed-space, although in making decisions about change of use the potential for improvements to the existing accommodation could be considered, to ensure that it the current provision is meeting the needs of modern travellers.

**Main impacts / mitigation / recommendations**

- None

## TO CREATE SAFE, HEALTHY AND INCLUSIVE COMMUNITIES

<b>SP12 – Housing</b>		
<b>Policy Summary:</b>		
<p>This policy sets out the overall provision of new dwellings to be delivered up to 2021 of 9690 (or around 646 per year over the plan period). The policy also states that the housing will be distributed according to the spatial distribution policy. An indicative number of affordable housing to be provided through the plan is given in the policy, this is only around 14% of the total anticipated housing delivery. The policy also shows which five year phase development will be delivered in, with almost half not anticipated until the final five year period.</p>		
Accessibility	?	Meeting this objective depends on the location of development. Where new housing is located near existing employment sites and local shops and services it will be accessible. However, in more peripheral locations or where development sites are severed from other land uses, such as by a busy road, rail line or motorway, access will be poor. For sustainable communities it is essential that residential sites are not isolated and everyone can get to essential services and jobs without needing to drive.
Housing	●	This policy should help meet this objective, including the provision of new affordable housing. However, much of the housing will not be delivered until the final five year period, it is not clear what this will mean for new housing availability or for the supply of affordable homes.
Health, safety and security	●	Provision of housing to meet peoples' needs is essential to ensure wellbeing and security.
Community	●	The strategic sites include new housing delivered in communities in need of regeneration.
Biodiversity	?	There is likely to be some inevitable impact on biodiversity through the development of 9,690 homes. However, the extent of these impacts can be mitigated against, through appropriate policy control. Particular attention will need to be given to any new housing development in proximity of the SAC sites in the County Borough, most importantly in Porthcawl that is surrounded on the coast by sensitive areas, as well as Parc Derwen.
Landscape	?	Development on the periphery of towns and villages will need to be decided to avoid landscape impacts.
Built environment	●	New housing presents the opportunity to enhance the built environment, through high quality design, and on larger sites the potential for carefully design urban layouts, to create high quality living spaces.

Air	?	There may be impacts on air, and this may depend on the extent to which it is possible to create more joined up development that reduces the need to travel.
Climate change	?	New housing development will have to be built in a way that allows it to be adaptable to withstand the impacts of a changing climate. This will include the need to ensure new development is not in areas at risk of flood, or will increase the risk of flood elsewhere. New homes will also have to be designed to take into account higher summer temperatures without the need for air conditioning. Development in Porthcawl waterfront will need to include sea defences to take into account rising sea levels.
Water	?	New development will create an additional requirement for sewerage and potable water supply.
Land/Soil	?	A large proportion of new development is to be directed to greenfield land, and this may not be the most efficient use of land. However, housing is also to be delivered on previously developed sites. It will also be necessary to ensure appropriate remediation of contained land when necessary.
Minerals and waste	?	New development will require provision for the sorting and collection of recyclable waste.
Renewable energy	?	In larger new development sites, either all housing or mixed use, there is the potential to ensure energy is used more efficiently and a proportion of energy is from renewable resources.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	?	Provision of new housing to meet diverse needs is essential in maintaining a workforce in the County Borough.

### **Sustainability Summary**

Setting out how housing development is to be delivered is one of the key roles of the LDP and the location where this is developed can have a major impact on delivering sustainable development. However, only around a quarter of the total figure of 9690 homes remains to be delivered through the LDP and the strategy that has been developed. Ensuring this development is directed in a way that helps meet the chosen LDP strategy is essential.

Figures on the percentage of housing allocated to each of the SRGA and the relative employment allocations are given in Table 3.1 of the LDP. This does give some indication of how growth of housing is matched to employment growth. However, the policy could be combined with other policies that quantify the distribution of development. Including quantification of the overall distribution of housing throughout the County

Borough is crucial in delivering a sustainable spatial strategy.

There may also be impacts on the natural environment from development of the strategic sites (and the rest of the residual development), through the development of greenfield land. For instance, there could be impacts on biodiversity, landscape and in the efficient use of land. The extent of these impacts cannot be identified from this policy, and it would be useful to see how these four strategic sites were selected.

NB. The number of homes has increased from the Preferred Strategy version LDP, from 8100 to 9000 and again from the deposit Plan to the adopted Plan, from 9000 to 9690. This is as a result of changes in the population and household predications by the Welsh Government and the LDP examination Inspector's findings. Therefore, figures provided by Bridgend County Council where updated whilst retaining the overall option for growth remained the same.

### **Main impacts**

New housing can clearly help meet the housing need in the County Borough, although only 15% of housing is anticipated to be delivered as affordable.

There are likely to be some impacts on environmental protection through development at this scale. The extent of this cannot be predicted at this stage.

### **Recommendations and mitigation**

- It is important that the distribution of housing is clearly related to the delivery of other types of development in the County Borough, for instance areas need a match of homes to jobs to help lower commuting and help more people to have equitable access to a home.
- Include in policy a breakdown of the expected housing provision from each sub-area of the County Borough.
- Delivery of housing on previously developed sites in preference to greenfield land (as stated in policy SP2) may have environmental (natural and built) sustainability benefits.
- Policies to mitigate against the possible impact of this scale of development will also be necessary, such as biodiversity and landscape protection, and avoiding risk of flood.
- Housing growth will need to be implemented alongside other plans and strategies and need to include how to manage increased visitor pressure on the Kenfig SAC that may be brought about by large scale development in Porthcawl.

## COM1 – Residential allocations in the Strategic Regeneration Growth Areas

This policy sets site allocations for new housing in the main regeneration growth areas identified in the spatial strategy.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	•	?	?	?	?	?	?	?	?	?	-	-	-	?

### Sustainability commentary

This policy lists all of the housing allocations in the Strategic Regeneration Growth Areas:

- Bridgend – 3324 units
- Maesteg and Upper Llynfi – 532 units
- Porthcawl – 1206 units
- the Valleys Gateway – 1296 units

Affordable homes: Bridgend 17% affordable; Maesteg and Upper Llynfi 15% affordable; Porthcawl 30% affordable; Valleys Gateway 22% affordable (this includes affordable housing 'not delivered through the planning system')

**Bridgend:** Five of the housing development sites are part of the mixed use development areas covered by Policy PLA3. Bridgend is the main town of the County Borough and development in this location can help support its role as a Primary Key Settlement and a Cross Boundary Settlement as set out in the Wales Spatial Plan. The anticipated job growth in the area means that new housing will have to be developed to help retain the ratio of jobs to homes and therefore help reduce commuting for employment. The major housing development site at Parc Derwen already has planning permission and well over half the housing is already committed. Despite Bridgend being one of the less affordable areas in the County Borough the proportion of affordable housing is only 17%. Monitoring and review of policy may be necessary to ensure that housing sites are coming forward in a quantity that is meeting local needs.

**Maesteg and Upper Llynfi:** A relatively small amount of new housing is directed to this Regeneration Area and at present only a small amount is already committed for development. It is hoped that development will come forward at this location to support new jobs that are also planned for the area. Affordable housing here is only at 15% and this may be suitable given the relative affordability of some homes in the area.

**Porthcawl:** This area is a focus for growth with the second highest anticipated housing yield of the four areas. However, almost all of the sites are already committed for development. Therefore, there may be a need to review the viability of existing permission and compatibility with current local and nation policy, to ensure these are delivered in the plan period to current sustainability standards. The high proportion of affordable housing in this location is positive for sustainable development, as this is one of the more expensive parts of the County Borough. Comparisons of housing allocation and employment allocation do reveal that despite the large amount of housing anticipated only 1% of new employment land is

located in the town. Monitoring of delivery may be required to ensure that an unsustainable pattern of commuting does not result from this policy.

**Valleys Gateway:** A large amount of housing in this area is already committed for development including the larger development areas. There are only 360 new allocations. Review of non-implemented permissions may be necessary to ensure that development is being brought forward over the plan period as anticipated. This is a conglomeration of smaller towns that together make up the development area. This part of the County Borough is to be the focus of new employment development and therefore housing development to match this growth will help promote self-containment, reducing the need to travel by car. The quantity of development in this location will see rapid change in the character of the area and it is essential that the sites are designed and developed in an integrated cohesive way. There is a risk that both employment and housing in these areas only creates increased travel, as easy access to the M4 means people may choose to live in this location but work elsewhere or vice versa. Employment, housing, retail and community services need to be well linked to help create new neighbourhoods rather than non-focused commuter areas.

### **Main impacts / mitigation / recommendations**

- Affordable housing provision must be monitored and policy reviewed if housing delivery is not matching housing needs.
- No land areas are given for development sites therefore it is difficult to tell the density of new housing. Housing should be built at densities that sustain a critical mass of population to support local services and shops, provide a vibrant living environment and make best use of available land resources.
- All the larger development sites should have a Design or Development Brief that sets out how development should be delivered on site. For mixed use areas this should include details of delivery of the mix and site layouts. All sites should have design guidance on how to avoid impacts such as biodiversity, landscape, flood, energy efficiency and movement routes.
- A large amount of housing is already committed for development. If permissions have stalled, and are unimplemented in the long-term, they should be reviewed to check viability and compatibility with national and local planning policy, particularly relating to sustainable development.
- Policies to mitigate against the possible impact of this scale of development will also be necessary, such as biodiversity and landscape protection, and avoiding risk of flood
- Housing growth will need to be implemented alongside other plans and strategies and include how to manage increased visitor pressure on the Kenfig SAC that may be brought about by large scale development in Porthcawl.

## COM2 – Residential allocations outside the Strategic Regeneration Growth Areas

This policy allocates sites for development outside the Strategic Regeneration Growth Areas. The majority of sites are already committed for housing development.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	•	?	?	?	?	?	?	?	?	?	-	-	-	?

### Sustainability commentary

This policy lists all of the housing allocations outside of the Strategic Regeneration Growth Areas:

1536 units and 21% affordable (this includes affordable housing 'not delivered through the planning system').

This policy is for housing sites outside of the Strategic Regeneration Growth Areas, although two are in other mixed use development areas covered by PLA policy.

The allocations are distributed around the County Borough and do include sites in the main towns, with six sites in Bridgend. What differentiates these Bridgend allocations from the other ones is not entirely clear, as not all the COM1 sites are within mixed use development area according to the Proposals Map.

New allocations include large sites at Bettws that is also a mixed use development area. There is also a large site at Ysgol Bryn Castell, Bridgend part of a larger development site that has yet to get planning permission.

Despite these sites not being in the main SRGA they are in settlements identified as having potential in the Bridgend County Borough Settlement Role and Function Study (2009). Therefore, development in these locations may help to provide the homes necessary to meet housing needs of these local communities. However, as with development throughout the County Borough it will be important to match new homes with available jobs and access to local services to make sure new 'sustainable places' are created. A mismatch of jobs, homes and services will create unsustainable travel patterns and can lead to problems of social isolation.

As many sites are already committed for development they will come forward anyway.

### Main impacts / mitigation / recommendations

- Information on implementation and viability may help make clear what the likelihood and timeframe is for non-developed commitments to be delivered. If permissions have stalled, and are unimplemented in the long-term, they should be reviewed to check viability and compatibility with national and local planning policy, particularly relating to sustainable development.
- All the larger development sites should have a Design or Development Brief that sets out how development should be delivered on site.

For mixed use areas this should include details of delivery of the mix and site layouts. All sites should have design guidance on how to avoid impacts such as biodiversity, landscape, flood, energy efficiency and movement routes.

- National and other LDP policies will help mitigate against the possible impact of this scale of development, such as biodiversity and landscape protection, and avoiding risk of flood.
- No land areas are given for development sites therefore it is difficult to tell the density of new housing. Housing should be built at densities that sustain a critical mass of population to support local services and shops, provide a vibrant living environment and make best use of available land resources.

**COM3 – Residential re-use of buildings or land**

This policy set the criteria for development on a windfall sites.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	•	?	?	?	?	?	?	?	?	?	-	-	-	-

**Sustainability commentary**

This policy should help make sure that windfall development fits with the surrounding land uses. The policy covers matters of amenity and appearance.

**Main impacts / mitigation / recommendations**

- None

**COM4 – Residential density**

The policy requires that most new sites (over 0.15 ha) are developed at 35 dwellings per hectare as a minimum.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
●	●	●	●	?	?	●	-	?	-	●	-	-	-	-

**Sustainability commentary**

Development in the past in parts of the County Borough have been at low densities and this can have adverse impacts on the sustainable use of land and making good quality places to live. Requiring a minimum density will make better use of land requiring less land take overall to meeting housing needs, this can have benefits for landscape, biodiversity and the quality of the built environment. Other advantages of higher density development is it can accommodate a critical mass of population necessary to support local services, such as local shops, post offices, schools and medical centres. Also, walking distances can be shorter on more concentrated development sites, encouraging walking, neighbour interaction and healthy lifestyles, all of which can help in creating communities.

The policy could consider including even higher density minimums in the most accessible locations such as near train stations and in town centres. However, design should not be compromised as overdevelopment of land can cause a deterioration in the built environment and create residential amenity problems.

**Main impacts / mitigation / recommendations**

- The policy could set higher density minimums for more accessible locations .

**COM5 – Affordable housing**

This policy sets the affordable housing targets for the County Borough. Different areas will require different levels of affordable housing to be provided to reflect the relative need and cost of homes in each area.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	●	●	●	-	-	-	-	-	-	-	-	-	●	?

**Sustainability commentary**

Provision of affordable housing is an essential component of delivering sustainable communities. Affordable housing can support socially and demographically mixed communities, for instance helping young people live in an area they would otherwise be priced out of. Therefore, there can be a range of benefits relating to social sustainability and community wellbeing. The demographic mix can also help support businesses by providing a varied workforce with a range of skills.

The policy only requires that affordable housing be provided on sites of 5 or more units or over 0.15 hectares. These site thresholds are useful as a significant proportion of new homes may come from small sites. Ensuring low threshold criteria will help secure a greater proportion of affordable housing provision.

**Main impacts / mitigation / recommendations**

- Affordable housing policies should be in place to make sure that wherever possible affordable housing is provided on-site to integrate affordable homes with market homes.
- Affordable planning guidance could be developed to help provide a consistent framework for managing affordable housing provision in development proposals. Advice could be included on how off-site provision or financial contributions will be managed.

**COM6 – Gypsy and traveller sites**

This policy sets the criteria for finding new Gypsy and Traveller sites in the County Borough.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	•	?	•	?	?	?	-	-	-	-	-	-	-	-

**Sustainability commentary**

Sustainable Gypsy and Traveller sites are those that provide a good quality living environment for the communities that will occupy them. Sites should be away from pollution impacts including noise and poor air quality, out of flood risk zones and have accessible shops, services, schools and health centres. There is also a need to ensure that the use does not harm the receiving environment, including biodiversity and landscape impacts, road safety and impacts on local amenity. This policy should help to ensure chosen sites are sustainable. However, it will be important to ensure that decisions made on the suitability of sites are not overly restrictive and harm the delivery of sites to meet the needs of these communities.

### Main impacts / mitigation / recommendations

- Finding and gaining planning permission for Gypsy and Traveller sites can be a difficult process, which means these communities miss out on a safe and secure place to pitch. Needs of these communities should be kept under review, and if necessary sites allocated through planning policy.

### SP13 – Community uses

#### Policy Summary:

The aim of the policy is to provide new community facilities to meet the needs of local communities. This will be achieved through the allocation land and protection of existing community facilities. Preference is given to co-location of facilities.

Accessibility	?	Providing community facilities to meet a local need is essential in providing equitable access for all. The co-location of community facilities could be of major benefit in terms of equitable access with many facilities provided in a single location.
Housing	-	This policy does not directly relate to this sustainability objective.
Health, safety and security	●	Provision of community facilities is essential in providing for healthy communities, as this will include public open space and sport facilities as well as healthcare provision.
Community	●	This policy approach is intended to help support communities in a variety of ways, including education, healthcare and leisure services.
Biodiversity	-	This policy does not directly relate to this sustainability objective.
Landscape	-	This policy does not directly relate to this sustainability objective.
Built environment	●	Provision of community services can help in improving the built environment. This is particularly where it includes new open space and parks which have an important contribution to make in the urban form.

Air	?	New accessible community facilities, especially community hubs can help in objectives to reduce the number of trips made by car, with positive impacts on maintaining air quality.
Climate change	?	Provision of new open space is important part of adapting to a changing climate, as summers get warmer it will be necessary to have good outside space provision suitable for informal recreation and leisure.
Water	-	This policy does not directly relate to this sustainability objective.
Land/Soil	-	This policy does not directly relate to this sustainability objective.
Minerals and waste	-	This policy does not directly relate to this sustainability objective.
Renewable energy	-	This policy does not directly relate to this sustainability objective.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	?	Creating high quality places to live will help enhance the image of the County Borough, encouraging businesses to move to and stay in the area as they grow.

### **Sustainability Summary**

Having a wide range of community facilities in place to meet the needs of the resident population and workforce is essential in supporting the people throughout their lives. Good quality provision can help improve peoples' wellbeing, ranging from good access to education, healthcare, recreational facilities and open space.

Provision of co-located community service provision can have sustainability benefits, including aiding the regeneration of areas and supporting local communities and could be a community focus. They can also have the advantage of providing a multi-facility building in a single location, that should help reduce the trips people have to make to meet day-to-day needs, and this could help reduce car travel. Co-location of various community services or with other services such as shops, should be an aim for sustainable spatial strategy. The current policy only requires co-location where suitable.

The implementation and delivery plan helps provide certainty on how proposed facilities will be delivered.

**Main impacts**

If successfully implemented this policy is likely to be of benefit to local communities, including in their health and wellbeing.

**Recommendations and mitigation**

- To successfully deliver new community facilities in some locations there will be a need for the LDP to be joined up with other plans and strategies.
- The policy should include more detail of the location of co-located facilities.
- An implementation plan is needed to demonstrate the funding sources for new community facilities and who will be responsible for their delivery, e.g. provided by developers, funded by section 106 contribution or delivered by service provider.

**COM7 – Protection of Social and Community Facilities**

The policy aims to prevent the loss of existing community facilities, unless the specified criteria can be met.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	●	●	-	-	-	-	-	-	-	-	-	-	-

**Sustainability commentary**

Protection of community facilities is positive for sustainable development. These facilities can help support communities, with wider benefits including health and access to services. The policy does allow these facilities to be lost in certain circumstances and this may put the availability of this type of service at risk. The policy must be rigorously applied to avoid loss, with any replacement services provided of a higher quality than those that are lost and as accessible. For instance, replacement services should be accessible by public transport and a walkable distance from residential areas. New services also need to be of the same type, for instance replacing open space with health or leisure centres may impact on their usability for all members of the community as access costs will increase. If existing facilities are found to no longer be required the policy should stipulate that the site is not lost to the community.

**Main impacts / mitigation / recommendations**

- Replacement facilities should be of a higher quality than those that are lost.
- For larger development sites a Health Impact Assessment may be required to assess the possible health needs of future residents, and

ensure appropriate services are in place.

**COM8 – Provision of health and social services**

This policy lists nine sites that where new health or social service development need to be built or extended.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
●	-	●	●	-	-	-	-	-	-	-	-	-	-	-

**Sustainability commentary**

The allocation of these health and social services sites comes from joint working with the local health boards to identify suitable sites to meet need. Providing accessible health and social care facilities will benefit local communities and help protect the health of the local population. The majority of the sites are quite accessible by being located in the middle town or local centres. Several sites, such as the land at Gibbons Way and Porthcawl Regeneration Area are in mixed use areas, which should help improve accessibility and reduce the number of trips people need to make.

The policy includes a provision to allow other sites for healthcare through working with local health boards. Where there is an existing poor access to health facilities, due to location or capacity, new facilities will need to be provided. Provision of new facilities will be particularly important near large housing allocations. Health Impact Assessment may be required to assess the need for additional sites. New community health services could be provided as part of larger housing development areas.

**Main impacts / mitigation / recommendations**

- For larger development sites a Health Impact Assessment may be required to assess the possible health needs of future residents, and ensure appropriate services are in place.
- All new facilities should be accessible by a variety of modes of transport.
- An implementation plan is needed to demonstrate the funding sources for new health facilities and who will be responsible for their delivery, e.g. provided by developers, funded by section 106 contribution or delivered by service provider.

## COM9 – Provision of community buildings

This policy simply lists all of the locations for new community buildings in the County Borough.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	?	●	-	-	-	-	-	-	-	-	-	?	-

### Sustainability commentary

The policy lists the sites allocated for new community buildings. These buildings will be for use by the community as meeting places, training centres, leisure centres, libraries. The policy does not specify the type of building that should be provided therefore there is potential for a range of uses. However, without details it is not possible to see what specific role the building would have in the new community and therefore ensure the correct type of use is delivered.

The allocated sites are found through the County Borough, including as part of larger new development areas, such a Part Afon Ewenni and Porthcawl Waterfront Regeneration Area. The allocated sites are often also associated with existing schools, indicating that these locations already have relatively good access to neighbourhood communities. It will be essential to make sure all of these new community uses have good access by non-car modes, including direct walking routes from local residential neighbourhoods.

The supporting text suggests that these building could be multi-functional and may contain some commercial elements. Allowing commercial development may help the community uses of the buildings be delivered, and secure the function of the building in the longer term. However, the policy could include more details of this, such as the quantity or proportion of floorspace that would be required for community use in allocated locations.

### Main impacts / mitigation / recommendations

- An implementation plan is needed to demonstrate the funding sources for new community facilities and who will be responsible for their delivery, e.g. provided by developers, funded by section 106 contribution or delivered by service provider.
- The policy could be more specific on the types of the development that 'community building' includes.

**COM10 – Provision of educational and training facilities**

This policy simply lists all of the locations for new educational and training facilities in the County Borough.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	?	●	-	-	-	-	-	-	-	-	-	●	-

**Sustainability commentary**

Providing new sites for schools is essential where existing capacity is being exceeded or where school sites are of a poor quality. Modern schools can have a positive impact on school standards. The policy is not very clear if it specifically relates to schools or if it includes other types of skills and adult training facility. The policy and supporting text is not clear on why these sites have been chosen and what is expected from their delivery. The policy could be improved by stipulating what each of the allocated sites are for, such as primary or secondary schools, colleges or other skills training.

The potential for these developments to provide facilities to the wider community should be encouraged through policy. For instance, space for adult education and use of sports pitches outside the school day.

**Main impacts / mitigation / recommendations**

- An implementation plan is needed to demonstrate the funding sources for new- education facilities and who will be responsible for their delivery, e.g. provided by developers, funded by section 106 contribution or delivered by service provider.
- It is essential that all education facilities are accessible by safe cycling and walking routes, to ensure good access and promote healthy lifestyles. These facilities should also be accessible and have good quality public transport.

**COM11 – Provision of outdoor recreation facilities**

This policy sets the standards required for new open space.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
?	-	●	●	?	?	?	-	?	?	-	-	-	-	-

**Sustainability commentary**

Provision of open space can have multiple sustainability benefits. This includes their use for outdoor leisure and promoting a healthy lifestyle, allotments for growing food, providing a multifunctional space of benefit to wildlife and the built environment character and to help in adapting to climate change, through flood storage and reducing urban heating. The policy sets a specific standard for open space, broken down by type. For instance playing pitches or allotments. To ensure that provision is secured there may need to be additional detail in the policy or supporting guidance to properly implement the policy and make sure the right kind of space is delivered in the right locations.

The distance standard of ‘no person more than 300m from an Accessible Natural Greenspace is a positive step in creating a healthy environment and helping people to make more healthy lifestyle choices.

**Main impacts / mitigation / recommendations**

- Additional policy guidance may be required on the standards of open space required. Additional guidance will help make sure that open space is provided to the quality necessary and secure management of provision in the long term.
- The requirement is for 2.6 ha per 1000 new population. However, few developments in the County Borough will achieve this growth as part of a single scheme. Therefore, there will need to be a strategy in place to ensure that each development makes a proportional contribution to delivery this standard. This could be through land or financial contributions, with delivery managed by the Council.
- This policy could be combined with Policies COM12 and 13 to indicate how the 2.6 ha standards will be met.

**COM12 – Provision of playing fields**

**COM13 – Provision of Public Open Space, recreation space and amenity space**

**COM14 – Provision of allotments and community food networks**

This policy identifies the location of new playing fields and other types of open space.

Access	House	Health	Comm	Biod	L’scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
●	-	●	●	●	●	●	-	?	?	?	-	-	?	●

**Sustainability commentary**

Identification of the location where new public open space, for formal and informal recreation and allotments, has the potential to have a range of sustainability benefits. These include their use for outdoor leisure and promoting a healthy lifestyle, allotments for growing food, providing a

multifunctional space of benefit to wildlife and the built environment character and to help in adapting to climate change through flood storage and reducing urban heating. To maximise the benefits of the open space, policies should be in place to secure the multifunctional role, for instance requiring all open spaces to retain hedgerows wherever possible, use sensitive lighting and promote walking and cycling links.

It is assumed that there are strategies in place for the design and layout of new open space provision. This will help to secure and manage developer funds to pay for the specific projects and in their delivery. However, in some locations developer contributions may not be sufficient to ensure the delivery of open space, such as in the smaller valley villages and towns. So to ensure that the sites are used as desired there should be implementation plans in place.

**Main impacts / mitigation / recommendations**

- A delivery and implementation plan should be prepared for each of the sites.
- Policy or policy criteria should be in place to ensure all open space makes the best use of the areas as a multi-functional asset for the County Borough.

**COM15 – Provision of cemeteries**

This policy identifies the location of new playing fields and other types of open space.

Access	House	Health	Comm	Biod	L'scp	Built	Air	Climate	Water	Land	Mins	Renew	Emp	Wealth
-	-	-	-	?	?	-	-	-	-	-	-	-	-	-

**Sustainability commentary**

Allocating sites for cemeteries will help prevent this land from alternative uses and meet the future needs of residents. As with other green spaces the multi functional role of these spaces should be realised, for instance as important biodiversity assets.

**Main impacts / mitigation / recommendations**

- None

<b>SP14 - Infrastructure</b>		
<b>Policy Summary:</b> This policy simply sets out the matters for which legal agreements will be sought to achieve necessary community and infrastructure benefits from development.		
Accessibility	●	Providing the infrastructure to meet the demands created by new development is crucial in providing accessible facilities. This will include agreements on the provision of education facilities, public transport and community facilities.
Housing	●	This policy includes agreements to secure affordable housing.
Health, safety and security	●	Infrastructure agreements will be negotiated on sports and open space, education and community facilities, all of which are necessary in improving wellbeing.
Community	●	Legal agreements can help secure a variety of benefits for the communities, from open space to climate change adaptation.
Biodiversity	●	The policy includes protection, enhancement and management of the natural environmental as a matter that can be covered by legal agreement.
Landscape	●	The policy includes protection, enhancement and management of the natural environmental as a matter that can be covered by legal agreement.
Built environment	●	The policy includes protection, enhancement and management of the historic and built environmental as a matter that can be covered by legal agreement.
Air	?	Policy includes public transport improvements as part of legal agreements, and it is hoped that this can help reduce car use and therefore air quality impacts.
Climate change	●	Climate change adaptation is a matter on which legal agreement can be sought, although it does not include any details of what this might be.
Water	-	This policy does not directly relate to this sustainability objective.

Land/Soil	-	This policy does not directly relate to this sustainability objective.
Minerals and waste	?	The policy includes the need to provide waste manage and recycling facilities, although there are no details as to the extent of this provision.
Renewable energy	●	The policy includes climate change mitigation as one of the considerations for legal agreements, and this should be backed by policy on specific schemes to deliver more efficient energy use or the generation of renewable energy.
Employment	-	This policy does not directly relate to this sustainability objective.
Wealth creation	-	This policy does not directly relate to this sustainability objective.
<p><b>Sustainability Summary</b></p> <p>Using legal agreements, as well as conditions, can help deliver development that can mitigate against the potential adverse impacts it may create. Such as to meet the needs of future residents through improved capacity and availability of educational facilities and providing new open space, and reduce impacts to the environment through environmental enhancement and reducing energy demand.</p>		
<p><b>Main impacts</b></p> <p>This policy is likely to have positive sustainability impacts relating to improving the quality of development.</p>		
<p><b>Recommendations and mitigation</b></p> <ul style="list-style-type: none"> <li>• Where legal agreements are to be negotiated these will need to be backed up by policy requirements, including meeting specific thresholds and targets for issues such as affordable housing and reducing energy demand.</li> <li>• Policy should set out the phasing of delivery of these infrastructure elements, as in many instances it will be necessary for these to be place prior to the completion of development. This not only relates to utilities infrastructure, but also those measures that go to create sustainable communities and sustainable travel.</li> <li>• Developers should only be able to avoid section 106 contributions where the development is essential and making contributions will make development entirely unviable. Missing out on section 106 contributions can have significant impact on achieving more sustainable development, as many aspects that are essential to creating sustainable communities can be reliant on developer funding. Examples of necessary development could include new public open space, provision of new community facilities, protection of the natural and built environment and affordable housing.</li> </ul>		

**Appendix 5**

**Proposed monitoring framework for SA – based on that proposed in the LDP**

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.	IND1: % of total County Borough housing developed in the SRGA IND2: % of total County Borough employment land developed in the SRGA IND8: Progress on RTP schemes IND22: Proportion of A1 retail uses in the Primary Shopping Areas
Housing	To provide the opportunity for people to meet their housing needs	IND25: Forecast supply of housing completions IND26: Annual housing completion figures IND29: Annual affordable housing completion figures
Health, safety and security	To improve overall levels of health and safety, including the sense of security, for all in the County Borough	IND31: Improvements to community facilities provision secured through planning consents, conditions and/or Section 106 agreements.
Community	To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend	IND31: Improvements to community facilities provision secured through planning consents, conditions and/or Section 106 agreements.
Effective protection of the environment		
Biodiversity	To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value	IND11a/b/c: Loss of natural habitats without mitigation or translocation of species associated with CCW/Countryside section observations on development control applications
Landscape	To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements	IND10: Green Wedge designated land lost to inappropriate development which contributes to coalescence of settlements. IND11a/b/c: CCW/Countryside section observations on development control applications
Built Environment	To maintain and enhance the quality of the built environment, including the cultural/historic heritage	IND12: Amount of development permitted which could potentially impinge upon one of those areas/buildings listed as advised by Cadw, the Glamorgan Gwent Archaeological Trust (GGAT) and the Conservation and Design section of the Council.
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	IND8: Progression on Regional Transport Plan developments
Climate change	To ensure that new development takes into	IND6: Developments which incorporate Climate Change adaptation techniques

	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	IND5: NRW / DCWW observations on development control applications
Land / Soil	To use land efficiently, retaining undeveloped land and bringing damaged land back into use	IND9: The amount of departure planning application permitted outside of the designated settlement boundaries of the County Borough IND10: Green Wedge designated land lost to inappropriate development which contributes to coalescence of settlements.
Minerals and waste	To maintain the stock of minerals and non renewable primary resources	IND13: Amount of aggregates landbank permitted as a percentage of total landbank identified in the Regional Technical Statement IND14: Number of planning permissions for permanent, sterilising development permitted within a buffer zone or a minerals safeguarding area.
Renewable energy	To increase the opportunities for energy generation from renewable energy sources	IND17: Progress on adoption of an Energy Opportunities Plan IND17/18: Permitted and / or installed capacity of renewable electricity and heat projects within the County Borough.
<b>Maintenance of high and stable levels of economic growth and employment</b>		
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	IND2: % of total County Borough employment land developed in the SRGA IND3: Implementation of strategic employment sites IND19: Annual take-up rate of employment land allocations developed / redeveloped for employment purposes.
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	IND3: Implementation of strategic employment sites IND19: Annual take-up rate of employment land allocations developed / redeveloped for employment purposes. IND20: Proportion of the allocated employment land immediately available or available in the short term. IND24: Annual number of overnight visitors to the County Borough.

**Appendix 6**  
**Relationship of the sustainability objectives with the issues to be  
addressed through Strategic Environmental Assessment**

The requirements of the SEA Regulations Wales (The Environmental Assessment of Plans and Programmes (Wales) Regulations 2004 SI 1656 (W. 170)) are that a plan is assessed for:

*“The likely significant effects on the environment, including short, medium and long-term effects, permanent and temporary effects, positive and negative effects, and secondary, cumulative and synergistic effects, on issues including—*

- (a) biodiversity;*
- (b) population;*
- (c) human health;*
- (d) fauna;*
- (e) flora;*
- (f) soil;*
- (g) water;*
- (h) air;*
- (i) climatic factors;*
- (j) material assets;*
- (k) cultural heritage, including architectural and archaeological heritage;*
- (l) landscape; and*
- (m) the inter-relationship between the issues referred to in sub-paragraphs (a) to (l).”*

The sustainability objectives for the sustainability appraisal cover all these topics, although in a broader way than they are expressed in the SEA Regulations. This enables the objectives to take into account the need to deliver the wider aims of sustainable development, rather than just avoiding environmental impacts.

The table shows the relationship with of the sustainability objectives with the issues identified by the SEA regulations requiring assessment. The table shows that many of the issues of SEA are cross-cutting in relation to sustainability objectives, but all of the issues are covered by at least one objective. Also, social and economic objectives are to some extent also relate to the SEA regulations through the need to address the needs of the population and human health.

<b>Concern</b>	<b>Objective</b>	<b>SEA Regulations ‘Issue’</b>
<b>Social progress which recognises the needs of everyone</b>		
Accessibility	<b>To ensure an increase in accessibility to opportunities, transport and to all services and information in the County Borough.</b>	<ul style="list-style-type: none"> <li>• human health</li> <li>• air</li> <li>• climatic factors</li> </ul>
Housing	<b>To provide the opportunity for people to meet their housing needs</b>	<ul style="list-style-type: none"> <li>• population</li> <li>• human health</li> </ul>
Health, safety and security	<b>To improve overall levels of health and safety, including the sense of security, for all in the County Borough</b>	<ul style="list-style-type: none"> <li>• population</li> <li>• human health</li> </ul>
Community	<b>To maintain, promote and where suitable enhance, the distinctive character of the communities of Bridgend</b>	<ul style="list-style-type: none"> <li>• population</li> <li>• human health</li> </ul>
<b>Effective protection of the environment</b>		

Biodiversity	<b>To maintain and enhance the diversity and abundance of species, and safeguard areas of significant nature conservation value</b>	<ul style="list-style-type: none"> <li>• biodiversity</li> <li>• fauna</li> <li>• flora</li> </ul>
Landscape	<b>To maintain and enhance the quality and character of the landscape, including its contribution to the setting and character of settlements</b>	<ul style="list-style-type: none"> <li>• Landscape</li> <li>• Cultural heritage</li> </ul>
Built Environment	<b>To maintain and enhance the quality of the built environment, including the cultural/historic heritage</b>	<ul style="list-style-type: none"> <li>• landscape</li> <li>• cultural heritage</li> </ul>
<b>Prudent use of natural resources</b>		
Air	<b>To reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere</b>	<ul style="list-style-type: none"> <li>• air</li> <li>• climatic factors</li> </ul>
Climate change	<b>To ensure that new development takes into account the effects of climate change</b>	<ul style="list-style-type: none"> <li>• water</li> <li>• air</li> <li>• human health</li> </ul>
Water	<b>To maintain and improve the quality and quantity of ground waters, river waters and coastal and bathing waters</b>	<ul style="list-style-type: none"> <li>• water</li> </ul>
Land / Soil	<b>To use land efficiently, retaining undeveloped land and bringing damaged land back into use</b>	<ul style="list-style-type: none"> <li>• soil</li> </ul>
Minerals and waste	<b>To maintain the stock of minerals and non renewable primary resources</b>	<ul style="list-style-type: none"> <li>• Material assets</li> </ul>
Renewable energy	<b>To increase the opportunities for energy generation from renewable energy sources</b>	<ul style="list-style-type: none"> <li>• air</li> <li>• climatic factors</li> </ul>
<b>Maintenance of high and stable levels of economic growth and employment</b>		
Employment	<b>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</b>	<ul style="list-style-type: none"> <li>• population</li> <li>• human health</li> </ul>
Wealth creation	<b>To achieve a clear connection between effort and benefit, by making the most of local strengths, seeking community regeneration, and fostering economic activity</b>	N/A

**Appendix 7**  
**Responses to the SA Report of the Deposit LDP and**  
**schedule of changes for the March 2012 'revised version'**

<b>Countryside Council For Wales</b>	
<p><b>Non-Technical Summary</b> The NTS refers to SA and SEA interchangeably without explaining the differences and relationship between the two.</p> <p>15. Reference needs clarification.</p> <p>16. What are the ‘contingency plans’ and ‘alternative solutions’. Have they undergone sustainability appraisal.</p>	<p>This is noted and better explanation of the two processes will be given in moving forward with the SA/SEA.</p> <p>NTS 15. Reference will be added to clarify this refers to the ‘spatial strategy’ of the LDP.</p> <p>NTS 16. Contingency plans will need to be determined by the Council but may include phased release of employment land or implementation of other strategies to stimulate economic growth (beyond those related directly to planning). Revised plans will require sustainability appraisal.</p>
<p><b>Section 1 – Introduction</b></p> <p>1.2 Concern there is no mention of environmental protection is in this section only sustainable development. Reminder of the need to fulfil requirements of SEA Directive to provide a high standard of environmental protection. Also, to contribute to the integration of environmental considerations in to the preparation adoption of plans and programmes with a view to promoting sustainable development.</p> <p>1.6 The wording needs to be revised to make clear that it covers social, economic and environmental issues. There should be more detail on the overlap of SA and SEA.</p> <p>There should be more reference to the HRA.</p>	<p>Introduction</p> <p>1.2 A note explaining the role of the SEA can be prepared to reflect the aims of the SEA Directive and the need to address environmental protection.</p> <p>1.6 A note will be prepared to add clarity to the purpose of SA and SEA and where the differences lie, in particular the focus of the SEA on environmental impacts.</p> <p>References will be added on HRA where relevant, although this is a separate process and to some extent the two must remain independent of one another.</p>
<p><b>Section 3</b></p> <p>3.4, 3.9, 3.15 At specific points and the report’s overall tone SA is referred to as a process that promotes sustainable development and helps to integrate sustainability into the plan. The Authority needs to bear in mind that the principal goal of SEA Directive is to provide for a high level of environmental protection of the environment and to</p>	<p>3.4, 3.9, 3.15 We recognise the importance of needing to comply with the SEA Directive. A note will be prepared to refer to the specific aims of SEA and the need to ensure environmental protection.</p>

<p>contribute to the integration of environmental considerations into the preparation and adoption of the plan. While 'sustainability' encompasses environmental consideration, we would like to have seen explicit reference to environmental protection. The Authority needs to reassure itself that it is complying fully with the requirements of the SEA Directive.</p> <p>3.11 It would improve transparency to have a record of the responses made the consultation on the SA scoping report, with a commentary to explain whether a comment was incorporated into the process or not.</p> <p>3.16 What is 'suitable' sustainability appraisal?</p> <p>3.17 The Changes Log should be an appendix to the main SA report.</p>	<p>3.11 Copies of responses to the SA Scoping Report<sup>1</sup> and the SA of the Pre-Deposit Proposals<sup>2</sup> are available on-line</p> <p>3.16 – Suitable refers to the additional amount of work that was completed to update the pre-deposit SA to the deposit version. However, the word suitable is redundant and could be deleted.</p> <p>3.17 – It was agreed with the Council that this would be a separate document to the SA report, as it is prepared by the Council and forms their response to the appraisal.</p>
<p><b>Section 4</b></p> <p>4.7 – 4.11 This section on international policy does not explain in sufficient detail why certain plans, programmes and policies have been selected and their relevance to Bridgend. There are also many omissions of relevant plans and strategies. Please see suggestions made at scoping.</p> <p>4.12-4.15 This section on UK Govt policy does not explain in sufficient detail why certain plans, programmes and policies have been selected and their relevance to Bridgend. There are also many omissions of relevant plans and strategies. Please see suggestions made at scoping.</p> <p>Since this document was produced additional policies, plans and</p>	<p>More detail will be added to this section on policy. However, reviewing the response to the scoping comments we are reluctant to include the full list of polices and programmes suggested. Many of these are already addressed through appropriate national policy and regulation and would not need to be repeated specifically for the SA/SEA of the Bridgend plan. Others are out-of-date or have very limited relevance to planning matters.</p> <p>More detail could be added to this section and suggestions will be reviewed for relevance when moving forward with the SA/SEA.</p> <p>The identification of new documents is welcomed and they will be</p>

<sup>1</sup> <http://www.bridgend.gov.uk/web/groups/public/documents/services/015235.hcsp>

<sup>2</sup> <http://www.bridgend.gov.uk/web/groups/public/documents/services/073273.hcsp>

<p>programmes have been issues. When there is opportunity in future, CCW would recommend that reference is made to the following strategies.</p> <p>4.48 Not clear what is being referred to here.</p>	<p>reviewed and incorporated into the SA / SEA where relevant.</p> <p>An updated reference to the shoreline management plan will be made in the SA report.</p>
<p><b>Section 5</b></p> <p>5.4 No consideration of the common land as a landscape component.</p> <p>5.7 There should be reference to the Habitats Regulations Appraisal and protected sites.</p> <p>5.8 Geodiversity should be referred to.</p> <p>No mention of soil as a receptor.</p> <p>5.11 There is currently no reference to carbon sinks in the bullet list.</p> <p>5.15 More detail is needed on issues around water quality.</p> <p>5.25 It is important to consider the accessibility of open space.</p>	<p>This is noted and common land will be added to the list of bullets in the SA report.</p> <p>Reference will be made in the SA to the findings of the HRA. The two processes were undertaken in parallel meaning findings could not be incorporated at this stage.</p> <p>Geodiversity will be recognised in the SA Report.</p> <p>The protection of soil will be referred to in the SA Report.</p> <p>Protecting carbon sinks, such as woodland, will be referred to as one of the bullets.</p> <p>These comments and those relevant on the HRA will be incorporated into the SA Report. HRA will recommend that the Council monitor water use and effects.</p> <p>Reference to accessibility will be added.</p>
<p><b>Section 6 – Sustainability objectives</b></p> <p>6.4 Refer to the specific role of SEA</p> <p>6.5 Not clear how relevant sustainability documents have been used.</p>	<p>Reference here will be made to the specific role of SEA – including how objectives relate to the SEA requirements in a separate note to accompany the SA/SEA,</p> <p>The objectives have been influence by definitions of sustainable</p>



7.29 Include specific reference to climate change.	Reference to climate change will be included in the SA Report.
7.41 Description of how the chosen option performs in terms of sustainable development is not informative.	Noted. A summary of the findings of the appraisal needs to be included as a separate note to accompany the SA/SEA.
<b>Section 9 – SA of the LDP Strategy</b> 9.2 and 9.21 Support for content	Noted
9.23 There is potential for environmental benefits of growth in this area.	This will be considered in the SA Report.
9.36 Cumulative impact of development should be considered.	The Council will have to consider cumulative impacts of new planning application or if applications should lapse. However, there is little scope available now to alter existing permissions, including considering how cumulative impacts should be monitored.
<b>Section 10 – SA of allocated sites</b> 10.2 Insert 'amendment to the policy wording' as a type of mitigation.	Noted. This will be included in the SA Report.
10.6 Support	Noted
10.17 Potential impacts to biodiversity may include fragmentation.	Noted. This will be included in the SA Report.
10.18 Support of recommendations.	Noted
10.21 There is no need to specifically refer to the landscape in SP4.	Noted
10.24 Support	Noted
10.25 Support	Noted
10.30 Support	Noted
10.32 Support concerns relating to water availability and refer to the response to the HRA.	Noted
10.33 Support	Noted

10.39 Clarify	Noted
10.42 Support	Noted
10.50 Support	Noted
10.61 Support	Noted
<b>Section 11</b> Support	Noted
<b>Section 12</b> Supportive of approach to monitoring – although there is lack of detail.	Noted, if more work is completed on monitoring for the LDP the SA will be updated to reflect this.
<b>Section 13</b> While there are potential negative environmental impacts of the LDP, it is the function of the SA/SEA process to help identify, quantify and where possible avoid or mitigate them. The current SA goes a long way towards achieving this and should be emphasised in this section, as should the need for the LDP to take account of these recommendations.	Noted
<b>Appendix 1</b> “?” symbol is not helpful and informative when there are multiple impacts, both positive and negative. It would have been more appropriate to use a +/- indicator where this is the type of assessment.  There are too many instances of “?” with no corresponding explanation.  Misalignment of text makes reading across confusing.	These comments are noted. Due to the nature of the plan objectives it is inevitable there will be many instances where it is not possible to draw a firm conclusion on the type of impact. Therefore, a large amount of ‘?’ would be expected and in some instances the type of impact cannot be predicted in any way without a great deal of assumption. It is necessary to read the summaries in the main text for a greater explanation in some cases. However, we believe that the SA is comprehensive and meets the requirements of the good practice and the SEA Direct.
<b>Appendix 2</b> It would be helpful to include the actual housing figures that relate to low, medium and high options given.	The appraisal is of the relative impacts of a high, medium or low level of growth. The original appraisal was of the Growth Options presented for consultation in 2007, although the figures have changed the relative impacts remain the same. No greater detail could be given of the assessment as growth levels were not directly related to the allocation of sites.
<b>Appendix 3 – SA of Strategic Options</b>	

<p>See comments on the Pre-Deposit proposals. These include:</p> <ul style="list-style-type: none"> <li>• Spatial options assessment by the plan making team is not included in the Pre-Deposit report [and Deposit]</li> <li>• The assessment that has been carried out is compromised by a number of assumptions – including policies to mitigate impact and that uncommitted allocations will be reviewed.</li> <li>• 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 options.</li> </ul>	<p>SA/SEA of the spatial options was carried out as part of plan preparation, both by the plan making team and by the SA consultants and by the plan makers. This enabled the relative sustainability and environmental impacts of pursuing each of the three alternatives to be considered, and the most suitable distribution of growth identified.</p> <p>To allow the appraisal of very strategic options assumptions have to be made. It was reasonable to assume that later stages of the LDP would include policies to mitigate impacts, and this has been shown through the appraisal of the Deposit Plan.</p> <p>Only uncommitted allocations can be reviewed and this has been undertaken.</p> <p>Pre-Deposit SA: Appendix 4 and Deposit SA: Appendix 3 to the Pre-Deposit SA contains the SA of options carried out the consultants. The Council plan making officers also completed their own appraisal of options integrated into plan making.</p>
<p><b>Appendix 4</b>  “?” symbol is not helpful and informative when there are multiple impacts, both positive and negative. It would have been more appropriate to use a +/- indicator where this is the type of assessment. There are too many instances of “?” with no corresponding explanation.</p> <p>There is little indication of any interrelationship between SA objectives, or identification of secondary, cumulative or synergistic effects.</p>	<p>These comments are noted. However, the key does state that the ‘?’ indicates those instances where there may be positive and negative effects. We believe that the SA is comprehensive and meets the requirements for SA and the SEA Regulations.</p> <p>Where impacts beyond the immediate and direct are identified they are noted. However, there has been no formal evaluation of these types of effect as part of assessment in the matrices. The main report draws together overarching impacts of policies and proposals including combined impacts and effects.</p>
<p><b>SP6 - Minerals</b>  CCW notes with some concern that an assessment of ‘no relationship’ is recorded for the policy, including coal extraction, against the objective for air quality, which includes a consideration of greenhouse gas emissions.</p>	<p>Burning of coal as an energy source will have air quality impacts. However, the policy is for safeguarding existing resources and does not presume new extraction or speed up the rate of extraction and use. Therefore, despite coal combustion having air quality impacts</p>

	<p>this policy may not directly create them. It is a requirement of national policy to protect coal reserves from sterilisation. Proposals for new power station could be required to consider impacts from burning of fuels.</p>
<p><b>ENV14 – Inert waste and ENV16</b>  Surprising that a policy concerned with developing inert waste sites in the countryside is assessed as having no relationship with biodiversity.</p>	<p>The assessment of the policy will be revised to identify biodiversity impacts. The impact should be marked as unknown as the impact on biodiversity will depend on the land chosen for this type of development. Policies will also need to be applied to ensure harm to biodiversity from these uses is not significant.</p>
<p><b>SP8 – Energy generation</b>  We would have expected to see the potential negative impacts of energy generation on biodiversity recorded (as they have been for landscape). We would also remind the Authority that, while the focus of this assessment seems to have been on onshore windpower, there are a whole host of renewable energy technologies to consider.</p>	<p>The assessment of the policy will be revised to identify biodiversity impacts. The impact should be marked as unknown as there may be the potential for adverse impacts from some types of renewable energy technology, including wind power, hydropower and tidal/wave power.</p>
<p><b>ENV17 - Renewable energy and low / zero carbon technology</b>  It is surprising that there is no positive effect assessed of this policy against the SA objective 'Air'.</p>	<p>The 'Air' objective should be clarified to differentiate between it and 'Climate change'. The policy does perform well against 'climate change'.</p>
<p><b>SP9 – Employment and the economy</b>  Welcome the recognition that development on greenfield land can have an impact on local landscape character, we remind the Authority that development elsewhere can have potentially negative impacts on landscape character too.</p>	<p>Comment is noted.</p>
<p><b>REG10 – Out of town retail developments</b>  <b>REG11 – New out of town bulky goods developments</b>  The policy includes the possibility of new out of town shopping developments and yet no potential impact on biodiversity, landscape, air, climate or land has been recorded. While we accept that statement that such development will need to comply with national policy, the <i>potential</i> for adverse impacts on SA objectives should be recognised in this assessment.</p>	<p>These comments are noted and it is agreed there may be an impact on these objectives.</p>
<p><b>SP13 – Community uses</b>  This policy could have a positive relationship with biodiversity through the careful management of open space.</p>	<p>It would be hoped there would be a positive impact on biodiversity from this type of development. However, this policy and supporting policies have very little in them that would help promote the</p>

	biodiversity value of open land. This may be something for plan makers to address.
<p><b>Sustainability appraisal of the Site Allocations</b></p> <p>Concerns that a number of site allocations overlap, wholly or partially, areas designated as Sites of Nature Conservation Importance (SNCI). The sustainability appraisal does not pick this up for the SA objective biodiversity. It should be recognised in each case and a negative impact recorded. The sites are:</p> <ul style="list-style-type: none"> <li>• COM2(9) Cefn Glas Road</li> <li>• COM1(31) Parc Tyn y Coed</li> <li>• REG1(37) Village Farm Industrial Estate</li> <li>• REG1(23) Bocam Park, Pencoed</li> <li>• REG1(8) Waterton Industrial Estate</li> <li>• REG1(18) Brynmenyn Industrial Estate</li> <li>• SP9(2) Island Farm, Bridgend</li> <li>• PLA3(10) Land West of Maesteg Road, Tondu</li> <li>• PLA3(9) Pwll-y-Waun, Porthcawl</li> <li>• PLA3(2) North-East Brackla Regeneration Area, Bridgend</li> <li>• PLA3(1) Parc Derwen, Bridgend.</li> </ul> <p>SINC policy should be referred to within the LDP.</p> <p>Two allocations are missing from the SA of site allocations. These sites are:</p> <ul style="list-style-type: none"> <li>• ENV17(2) Tythegston Landfill</li> <li>• ENV17(3) Penybont Waste Treatment (also close to Merthyr Mawr SSSI and Kenfig SAC).</li> </ul>	<p>The Council accepts the need to update the Site Allocations Sustainability Appraisal document in terms of reference to those sites which overlap a SINC.</p> <p>Policies ENV17(2) and (3) are operational developments and therefore no site specific SA is required.</p>

<b>Environment Agency Wales</b>	
<p><b>Section 5 – Sustainability issues to be addressed in the LDP area</b></p> <p><i>Biodiversity:</i> Must be satisfied that development will not have any significant adverse impacts on the integrity of European Protected Species and their sites.</p> <p><i>Climate change:</i> We note that new development will avoid flood risk areas (fluvial and tidal), we are satisfied that TAN 15 has been taken into consideration when allocating sites and our advice given at the candidate site assessment stage has also been considered.</p> <p><i>Water:</i> It states here that ‘to protect water quality capacity in water treatment infrastructure need to be in place prior to development being completed.’ We would wish to see improvements prior to development commencing.</p> <p><i>Flood:</i> We are pleased to see that developing on the flood plain and in flood risk areas will be prevented, and the use of SuDS incorporated where appropriate.</p> <p><i>Open space:</i> It states here that ‘the LDP must protect and enhance open space and rights of way as part of any development above an appropriate size’. We support this.</p> <p><i>Minerals:</i> Your Authority must ensure that adequate policies are put in place to avoid adverse environmental impact.</p> <p><i>Waste:</i> The LDP refers to the Regional Waste Plan, which is good, however your Authority must ensure compliance with the Waste Hierarchy.</p>	<p>This point is noted. An HRA has been undertaken to identify the potential for significant adverse impacts on European protected sites. Protected species will need to be managed on a site by site basis.</p> <p>Noted. The SA/SEA notes that avoiding flood risk area is important.</p> <p>Noted and update will be made to the SA/SEA.</p> <p>The SA/SEA notes that avoiding flood risk area is important. However, policy will be followed and some development in flood prone areas may still occur after suitable tests have been followed.</p> <p>Noted.</p> <p>Noted.</p> <p>Noted. Reference will be made to the Regional Waste Plan.</p>
<p><b>Section 6 – The sustainability objectives</b></p> <p><i>Air:</i> The objective is to reduce all forms of air pollution in the interests of local air quality and the integrity of the atmosphere, unfortunately</p>	<p>Noted. Additional criteria have been added as supporting objectives relating to greenhouse gas emissions.</p>

<p>the supporting objective do not address this.</p> <p><i>Water:</i> The objective is to maintain and improve the quality and quantity of groundwaters, river waters and coastal bathing waters. We support this objective.</p> <p><i>Land/soil:</i> Refers to re-using previously developed land, remediation of contamination and protection of the soil, which we fully support.</p>	<p>Noted.</p> <p>Noted.</p>
<p><b>Section 10 – SA of policies and allocated sites</b></p> <p>10.18 It states within this paragraph that ‘a green infrastructure plan for the County should include biodiversity protection and enhancement’. What is the timescale for this document to be produced?</p> <p>10.29 Potential Adverse Impacts – Apparently some strategic allocations may be in areas at risk of tidal or fluvial flooding. The SFCA study and LDP Policy SP2 should ensure this does not happen.</p> <p>10.30 Recommendations and mitigation – Refers to an Energy Opportunities Plan. When will this be complete?</p> <p>10.33 Recommendations and mitigation – Phased development to ensure there is enough capacity within the sewerage system is recommended, which we support. However, within the same paragraph it mentions ‘prior to occupation’. As above this should be changed to prior to commencement.</p>	<p>This will be produced as a Supplementary Planning Guidance document. The timetable for preparation is not clear, although the planning authority noted it as a priority.</p> <p>Some allocations may be in flood prone areas as they are already committed for development. Others may be allocated following sequential tests.</p> <p>The text of this section will be revised to refer to the November 2011 update of the Bridgend Energy Opportunities Plan.</p> <p>Noted. Text will be amended to prior to commencement where possible.</p>
<p><b>Appendix 4 – SA of policies</b></p> <p>Effective protection of the environment includes ‘maintain and enhance’ for biodiversity, landscape and the built environment, we support this.</p>	<p>Noted.</p>