

Bridgend Local Development Plan

REPRESENTATIONS by Representor

c/o Greenfields Land Reclamation Wales Ltd

V S & D S

Hughes & Owen

5 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Merthyr Mawr Community Council

Mrs Anne

McAllister

46 A 1

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

Bridgend Local Development Plan

Vale of Glamorgan Council

REPRESENTATIONS by Representor

Mr D R

Thomas

57 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

**Neath Port Talbot County Borough
Council**

Mr G A I

Jenkins

59 A 1

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

Bridgend Local Development Plan

Environment Agency Wales

REPRESENTATIONS by Representor

Mr Phil

Coombe

61 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

The Glamorgan Gwent Archaeological Trust Ltd

Mr Neil

Maylan

63 A 1

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

Bridgend Local Development Plan

Welsh Assembly Government

REPRESENTATIONS by Representor

Ms Lesley

Punter

64 A 1

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

Bridgend Local Development Plan

Bridgend Local Health Board

Mrs Zoe

REPRESENTATIONS by Representor

Wallace

66 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Welsh Water / Dwr Cymru

Mr Rhidian

Clement

72 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Councillor M

Quick

112 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Councillor A E

Davies

119 A 1

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

Bridgend Local Development Plan

British Geological Survey

REPRESENTATIONS by Representor

Dr Adrian

Humpage

157 A 1

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

Bridgend Local Development Plan

Design Commission for Wales

REPRESENTATIONS by Representor

Cindy

Harris

166 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bro Morgannwg NHS Trust

170 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr V S

Hughes

179 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr P D

Kinsella

183 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr Gareth

Ames

184 A 1

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

Bridgend Local Development Plan

Porthcawl Civic Trust Society

REPRESENTATIONS by Representor

Mr Mike

Mansley

192 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Mr & Mrs R J

Hayes

193 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

British Horse Society

Mr G.J

Wheeler

212 A 1

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

Bridgend Local Development Plan

Porthcawl 4M Group

REPRESENTATIONS by Representor

Mrs P R

Chapman

277 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

RSPB Cymru

Mr Mike

Webb

293 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

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

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

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

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

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

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

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

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

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

No action required.

Supplementary Planning Guidance:

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

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

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Appendices:

Appendix 1:

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

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

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

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

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

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

No action required.

Bridgend Local Development Plan

REPRESENTATIONS by Representor

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bridgend Housing Partnership

Mr Peter

Green

583 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bridgend Town Centre Forum

Mr Jonathan

Hughes

584 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

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

REPRESENTATIONS by Representor

Planning Inspectorate Wales

Miss Vicky

Brown

591 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Bridgend Women's Aid

Ms Karen

Miller

595 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Communities First Bridgend

612 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

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

McKenzie

616 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

H

Price

618 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

Island Farm Action Group (IFAG)

Mrs Anne

Morgan

624 A 1

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

Bridgend Local Development Plan

REPRESENTATIONS by Representor

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

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

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

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

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

No action required.
