

BRIDGEND
REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Important Notes:

- The purpose of the examination is to determine whether the Bridgend Replacement Local Development Plan 2018 – 2033 (LDP) is sound in accordance with the Development Plan Manual, Edition 3. (The Manual). **To be sound the Plan must meet the three tests set out in the Manual: is it consistent with other plans; appropriate for the area in the light of the evidence; and deliverable and effective.** In addition, the LDP must have been prepared in compliance with legal and regulatory procedural requirements.
- Participants should only respond to the questions below which directly relate to their previously submitted written representations on the plan. Please clearly indicate in your statement(s) the question(s) you are answering.
- Further statements should be proportionate in length to the number of questions being answered and should not, in total, exceed 3,000 words per matter.
- I am examining the LDP as submitted by the County Borough Council. Therefore, I will not, at this stage, be considering the merits for development of sites not included in the plan.
- PEDW issued some preliminary questions (PQs) about the LDP and its preparation in Summer of 2022. The Council's detailed answers to the preliminary questions are on the website and may be of interest to participants. For clarity, where the PQs have been replicated in this document, the Council will not be required to provide an additional response, a reference to the earlier answer will be sufficient.
- If you have questions in respect of this document or any aspect of the examination please contact the Programme Officer, Amanda Borge, on 07977845855 or by email at LDPProgrammeOfficer@bridgend.gov.uk

Matter 1: Plan Preparation and LDP Strategic Framework

Issue – Is the LDP legally compliant, and is the Plan's Strategy justified and likely to be effective in ensuring that development needs of Bridgend can be met in a way that contributes to the achievement of sustainable development?

Plan Preparation

1. Has the LDP been prepared in accordance with the requirements of:
 - a) The approved Delivery Agreement, including the Community Involvement Scheme?

- b) The Well-being of Future Generations Act (Wales) (2015)? and
 - c) The Equality Act (2010)?
2. Has the Plan been subject to a robust Sustainability Appraisal/Strategic Environmental Assessment? and have all the 'likely significant environmental effects' of the Plan and all 'reasonable alternatives' been identified, described and evaluated?
 3. Has the Plan been subject to a robust Habitats Regulations Assessment? Where 'likely significant environmental effects' have been identified, has an adequate Appropriate Assessment been undertaken?
 4. Does the HRA take account of National Resources Wales advice regarding phosphate levels in Riverine Special Area of Conservation?
 5. Is the Plan consistent with Future Wales: The National Development Framework?
 6. Has the Plan had regard to the requirements of the Well-being of Future Generations Act (Wales) 2015 with regard to the well-being goals and ways of working?
 7. Have there been any significant changes in national policy or local circumstances since the LDP was placed on deposit? if there have, what are the implications of these changes for the Plan? do they need to be addressed through the preparation of new evidence and/or revisions to the Plan? what is the intended timescale for this work?

Vision, Objectives and Strategy

8. Is the Plan's Vision sufficiently aspirational and locally specific to form the basis for planning to 2033? and how will they be delivered?
9. Are the Plan's objectives SMART and capable of delivering on the identified Vision?
10. Does the Plan's Growth and Spatial Strategy represent an appropriate approach for delivering, managing and distributing growth over the Plan period?
 - a) How has the Growth and Spatial Strategy been derived and is it based on robust evidence?
 - b) What are the key components of the Growth and Spatial Strategy and how do they interact?
 - c) Does the Growth and Spatial Strategy represent a sustainable approach to planning over the plan period? and does it effectively link transportation, employment and residential growth?
 - d) Does the Growth and Spatial Strategy maximise the use of previously developed land? and adopt the sequential approach to the release of land as set out in Planning Policy Wales?
 - e) Is the Strategy and policy framework consistent with national planning policy relating to Flood Risk?
 - f) Is the Growth and Spatial Strategy consistent with those of neighbouring authorities? what are the main cross boundary issues and how have these been addressed?
11. How was the Settlement Hierarchy derived, and is it based on robust and credible evidence?

- a) What is the purpose of the settlement hierarchy? will it guide new development to the most sustainable locations? and is it clear what types and amount of development, other than housing, will be appropriate in each tier of the hierarchy?
 - b) What is the rationale for the proportions of development split across the tiers?
 - c) Are the settlement boundaries drawn sufficiently widely to enable the predicted amount of growth?
12. How was the Regeneration and Sustainable Growth Strategy defined? and is it based on robust and credible evidence?
13. How was the Regeneration Growth Area and the Sustainable Growth Area defined and are they based on robust and credible evidence?
14. Is the approach to site selection sufficiently clear and transparent, and is it founded on a robust and credible evidence?
- a) Are the allocated sites based on a robust site assessment methodology that takes into account all potential constraints?
 - b) Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites?
15. Is it clear why the Strategic Development Sites were selected over other candidate sites? and is the Plan over reliant on the delivery of these sites?
16. How will the Plan apply the principles of sustainable placemaking?
17. Will the requirements of the Flood and Water Management Act 2010, in respect of sustainable drainage systems have an impact on the development capacity, viability and/ or deliverability of allocated sites?
18. How will the Plan seek to mitigate the impact of climate change?
19. How will the plan address the issues of the Welsh language?
20. Will the Plan be supported by Supplementary Planning Guidance? and what will be the status of Place Plans and how will they relate to the LDP?

Matter 2: Active, Healthy, Cohesive, Inclusive and Social Communities – Housing and Greenspace

Issue - Is the provision and distribution of housing soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

Housing Provision

1. Is the housing requirement figure identified in Policy SP6 appropriate?
 - a) How has the requirement figure of 7,575 been derived? and is it based on robust and credible evidence?
 - b) In identifying the requirement figure, has adequate regard been paid to the most recent Welsh Government household and population projections?
 - c) Have alternative housing growth scenarios been considered? if so, why have they been discounted, and why has the preferred option been chosen?
 - d) Has the requirement figure been informed by a robust assessment of the main local influences on housing demand in Bridgend including, household formation size, migration levels, and vacancy rates?

2. Is the housing land supply figure identified in Policy SP6 appropriate?
 - a) How has the supply figure of 9,207 been derived? and is it based on robust and credible evidence?
 - b) What is the make-up of the housing land supply?
 - c) Is the Plan over reliant on the delivery of the strategic development sites? and should more non-strategic sites be allocated?
 - d) Is the estimated yield of units from committed and windfall sites realistic and based on robust evidence? and has a non-delivery allowance been defined and applied?
 - e) Should details of the committed housing sites be included in the Implementation and Deliver Appendix?
 - f) How has the flexibility allowance of 20% been defined? And is it based on robust and credible evidence?
 - g) What role will Place Plans play in the delivery of housing?
3. Is the rate of delivery contained in the housing trajectory realistic, and based on robust and credible evidence?
4. Will the Plan deliver the housing requirement?
 - a) Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?
 - b) Should committed sites be allocated? If not, what will happen to such sites if planning permissions lapse?
 - c) Is the Plan's housing strategy sufficiently flexible to respond to changing circumstances?

Housing Distribution and Development

5. Is the spatial distribution of new housing development sustainable and coherent?
 - a) How will new windfall development within each tier of the settlement hierarchy be assessed and managed?
 - b) Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy?
6. Will Policy COM6 ensure a balanced mix of house types, tenure and sizes? and is the approach to managing density levels appropriate?
7. Does Policy COM7 provide a clear and consistent mechanism for assessing proposals for houses in multiple occupation?

Provision of Outdoor Space and Accessible Greenspace

8. Are the requirements of Policy COM10 appropriate and based on robust and credible evidence?
9. Does Policy COM11 provide an effective mechanism for the provision of natural and semi-natural greenspaces? Should the policy include reference to promoting provision through enabling development? and has the site allocated at Waunscil Avenue, Bridgend (Policy COM11(7)) been correctly annotated on the proposals map?

Matter 3: Active, Healthy, Cohesive, Inclusive and Social Communities – Affordable Housing and Gypsy, Travellers, and Show People

Issue - Are the requirements for affordable housing and Gypsy and Travellers accommodation supported by robust and credible evidence and consistent with national policy? And will they be met during the Plan period?

Affordable Housing

1. Is the Local Housing Market Assessment (LHMA) based on robust and credible evidence? And are the findings sufficiently to inform the Plan's affordable housing strategy?
 - a) What scale of housing need has been identified in the LHMA?
 - b) What mix of tenure (e.g intermediate or social rented) and of type dwelling (bedroom size) are required?
 - c) Will the affordable housing target of 1,977 dwellings meet the local housing need, if not what other mechanisms are available?
2. Is the Plan-wide Viability Assessment based on robust and credible evidence?
 - a) Does the study's methodology take account of variations in building costs, planning obligations, sustainable urban drainage systems, fire safety measures and other associated requirements?
3. How have the affordable housing targets and thresholds in Policy COM3 been defined?
 - a) Is the affordable housing target of 1,977 dwellings realistic and based on robust evidence?
 - b) Is the threshold of 10 units or more realistic and based on robust evidence?
 - c) How will the affordable housing target be delivered?
 - d) Will a greater percentage of affordable housing be sought on strategic sites? and if so why?
 - e) Is Policy COM2 necessary or are these requirements addressed in Policies COM3, COM4 and COM5?
4. How will off-site or commuted sum contributions for affordable housing be secured and managed? What mechanisms are in place to ensure that the level of contributions sought are appropriate?
5. Is the spatial distribution of affordable housing sound and does it adequately reflect local needs?
6. Are the requirements of Policy COM5 appropriate and consistent with the requirements of national planning policy?
 - a) Is restricting the number of affordable dwellings that can be constructed on exception sites to 10 realistic or appropriate?

Gypsy and Traveller Accommodation

7. Is the Gypsy and Travellers Accommodation Assessment (GTAA) based on robust and credible evidence and sufficient to inform the Plan's strategy?
 - a) What is the status of the most recent GTAA?
 - b) How has the need for 7 new permanent Gypsy and Traveller pitches over the plan period been identified? And how will this need be met?
8. Does Policy COM8 provide a clear and consistent framework for assessing proposals for additional Gypsy and Travellers sites, and is it consistent with national policy?
9. Is the Gypsy and Traveller site allocated under Policy SP7(2) at Land adjacent to Bryncethin Depot sound and capable of being delivered during the plan period?
 - a) What is the current use of the allocated?
 - b) What is the proposed use of the allocated site?
 - c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
 - d) What are the mechanisms and timescales for delivering the site?
 - e) Is the allocation of the essential to ensure the soundness of the Plan?

Matter 4: Productive and Enterprising Places – Employment and Infrastructure

Issue - Is the economic strategy coherent and based on a clear and robust preparation process? Will it address the Key Issues and Strategic Objectives effectively and efficiently? Are the policies realistic and appropriate in the light of relevant alternatives and are they based on robust and credible evidence?

Employment

10. Is the Economic Evidence Base Study based on robust and credible evidence? and are the findings sufficient to inform the Plan's economic strategy?
11. What are the key drivers for change in Bridgend's employment market? and how has the Plan addressed these considerations?
12. How many new jobs are estimated to be created as a consequence of the Plans economic strategy? And in what sectors?
13. What is the cross-border employment relationship? what proportion of the existing jobs within Bridgend are filled by employees from outside the County Borough? how many of Bridgend's residents travel to work outside the County Borough? and how has this movement been accounted for in its employment forecasts?
14. Is the level of employment land provision identified in Policy SP11 appropriate?
 - a) How has the overall figure of 71.7 hectares been derived? is the level of employment land provision fully justified and supported by robust and credible evidence?
 - b) Does Policy ENT2 clearly differentiate between allocated and committed sites? are the sites realistic and economically viable? and are they free from significant constraint and deliverable over the Plan period?

- c) Is the hierarchy of employment sites appropriate? and consistent with the requirements of national planning policy?
 - d) What is the Plan's strategy for the distribution of employment land? does it have regard to the requirements of Future Wales – The National Plan and other regeneration initiatives?
 - e) Are all the sites allocated in Policies SP11 and ENT1 intended to be developed for B1, B2 and B8 purposes? if not should the policies be amended to make clear the intended / potential use?
 - f) Does Policy ENT3 provide an appropriate framework for the development of employment proposals on non-allocated sites? Is it flexible enough to adapt to changing circumstances?
 - g) Should details of the strategic and non-strategic employment sites be included in the Implementation and Delivery Appendix?
15. Does Policy ENT4 provide an appropriate framework for the management of employment sites in rural areas?
16. Does Policy ENT5 provide an appropriate framework for the management of development at the Former Ford Site, Bridgend? and should it be included in Policies SP11 and ENT1?
17. How will the Plan maintain and enhance the County Borough's tourism, culture and leisure offer?

Infrastructure

10. Does Policy SP10 provide an appropriate mechanism for securing new infrastructure? is it based on robust and credible evidence and consistent with national planning policy?
11. Will Policies SP9 and COM9 provide an effective framework for the protection of existing, and delivery of future, community facilities?
12. Does the Plan provide a clear and consistent framework for securing planning obligations? and how will competing priorities would be managed?

Matter 5: Productive and Enterprising Places – Renewable Energy

Issue: Does the Plan provide a framework for the management of renewable energy and low carbon development that is soundly based, justified and consistent with the requirements of national policy?

1. Is the Renewable Energy Assessment robust, based on credible evidence and consistent with the requirements of national planning policy?
2. Does the Plan provide an appropriate balance between realising the area's potential for renewable energy production and the protection of the landscape, natural and historic environment of Bridgend?
3. Does the Policy SP13 provide an appropriate policy framework for realising Bridgend's potential for renewable energy generation?
 - a) Is the policy consistent with the requirements of national planning policy?
 - b) Are the defined local search areas for wind and solar robust? and should they be annotated on the proposals map?

- c) Should defined local search area for wind be amended to take account of the pre-assessed areas for wind energy contained in Future Wales: The National Development Plan?
 - d) Are the requirements of Policy SP13(b) and paragraph 5.4.85 appropriate for the consideration of wind energy development of less than 10 MW? and how will the approach work when considered in conjunction with Policies SP17 and DPN4?
4. Should the pre-assessed areas for wind energy contained in Future Wales: The National Development Plan be annotated on the proposals map?
 5. Is the target for energy generation contained in Table 10 – Targets for Area-Based Resource Use appropriate or should it be more ambitious?
 6. Are Policies ENT10 and 11 necessary? and do they provide an appropriate mechanism for securing low carbon heating technologies for new development and energy efficient design?
 - a) Have the requirements of the policies been superseded by amendments to Part L of the Building Regulations?
 - b) Should 'Major Development' be defined in the policies reasoned justifications?
 - c) Is the requirement for energy masterplans to be provided by all major development based on robust and credible evidence? and what impact would this threshold have on the viability of new development?

Matter 6: Good Design and Sustainable Placemaking – Sustainable Transport and Accessibility

Issue: Does the Plan provide a framework for the management of Sustainable Transport and Accessibility that is soundly based, justified and consistent with the requirements of national policy?

1. Does Policy SP5 provide a clear and consistent framework for the integration and coordination of sustainable transport measures and land use planning? and does it adequately promote active travel and reduce the need to travel?
2. Does Policy PA11 provide an appropriate framework for the management of vehicular parking? and is it consistent with the requirements of national planning policy?
3. Is Policy PLA7 based on robust and credible evidence? and is it necessary to provide a framework for the management of new development?
4. Should Policy PLA12 be amended to recognise the potential for enabling development to take place to fund the delivery of the active travel network?

Matter 7: Protect and Enhance Distinctive and Natural Places – Built, Historic and Natural Environment

Issue: Does the Plan provide a framework for the management of the built, historic and natural environment that is soundly based, justified and consistent with the requirements of national policy?

Natural Environment

1. Does Policy SP17 provide a clear and consistent framework for the conservation and enhancement of the natural environment?
2. Do Policies SP17 and DNP6 accurately reflect the requirements of national planning policy in respect of net benefit for biodiversity? and should Policy DNP6 be amended to include reference to promoting recreation linkages and promoting active travel?
3. Are the requirements of Policy DNP5 clear and consistent with national planning policy?
4. Is the reference in Policy DNP7 to 'Special Trees' necessary? and consistent with the requirements of national planning policy?
5. Are the requirements of Policy DNP8 in respect of the provision of green infrastructure assessments clear and based on robust and credible evidence?

Built and Historic Environment

6. Are the requirements of Policy DNP1 clear and consistent with national planning policy?
7. Should Policy SP18 refer to 'preserve and enhance' rather than 'promote or enhance' the significance of heritage assets?
8. Are Policies DNP 10 and 11 locally distinct or do they replicate the requirements of national planning policy?

Matter 8: Good Design and Sustainable Placemaking – Strategic Allocation at Porthcawl Waterfront, Porthcawl (Policies PLA1, SP2(1) and ENT6 (2))

Issue – Is the allocated Strategic Development Site soundly based and capable of delivering new residential, community and commercial development over the Plan period?

- a) What is the current use of the Strategic Development Site (SDS)?
- b) What is the proposed use of the SDS?
- c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
- d) In light of the constraints, and having regard to the need to provide affordable housing, is SDS economically viable?
- e) Are the number of residential units proposed realistic and deliverable over the plan period?
- f) Is the quantum of new retail floorspace proposed realistic and deliverable over the plan period?
- g) How and when will the proposed new educational facilities be delivered?
- h) What are the mechanisms and timescales for delivering the site?
- i) Is the allocation of the SDS essential to ensure the soundness of the Plan?

Matter 9: Good Design and Sustainable Placemaking – Strategic Allocation at Land South of Bridgend (Island Farm) (Policies PLA2 and SP2(2)) and Housing Allocations at Parc Afon, Ewenny (Policy COM1(1) and Craig y Parcau, Bridgend (Policy C)M1(2))

Issue – Is the allocated Strategic Development Site and housing sites are soundly based and capable of delivering new residential and community development over the Plan period?

Policies PLA2 and SP2(2): Land South of Bridgend (Island Farm)

- a) What is the current use of the Strategic Development Site (SDS)?
- b) What is the proposed use of the SDS?
- c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
- d) In light of the constraints, and having regard to the need to provide affordable housing, is SDS economically viable?
- e) Are the number of residential units proposed realistic and deliverable over the plan period?
- f) How and when will the proposed new educational facilities be delivered?
- g) What are the mechanisms and timescales for delivering the site?
- h) Is the allocation of the SDS essential to ensure the soundness of the Plan?

Policy COM1(1): Parc Afon, Ewenny and Policy COM1(2): Craig y Parcau, Bridgend

- f) What is the current use of the allocated site?
- g) What is the proposed use of the allocated site?
- h) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
- i) In light of the constraints, and having regard to the need to provide affordable housing, is the allocated site economically viable?
- j) Are the number of residential units proposed realistic and deliverable over the plan period?
- k) What are the mechanisms and timescales for delivering the site?
- l) Is the allocation of the site essential to ensure the soundness of the Plan?

Matter 10: Good Design and Sustainable Placemaking – Strategic Allocation at Land West of Bridgend (Policies PLA3 and SP2(3))

Issue – Is the allocated Strategic Development Site soundly based and capable of delivering new residential and community development over the Plan period?

- a) What is the current use of the Strategic Development Site (SDS)?
- b) What is the proposed use of the SDS?
- c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

- d) In light of the constraints, and having regard to the need to provide affordable housing, is SDS economically viable?
- e) Are the number of residential units proposed realistic and deliverable over the plan period?
- f) How and when will the proposed new educational facilities be delivered?
- g) What are the mechanisms and timescales for delivering the site?
- h) Is the allocation of the SDS essential to ensure the soundness of the Plan?

Matter 11: Good Design and Sustainable Placemaking – Strategic Allocation at Land East of Pencoed (PLA4 and SP2(4))

Issue – Is the allocated Strategic Development Site soundly based and capable of delivering new residential and community development over the Plan period?

- a) What is the current use of the Strategic Development Site (SDS)?
- b) What is the proposed use of the SDS?
- c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
- d) In light of the constraints, and having regard to the need to provide affordable housing, is SDS economically viable?
- e) Are the number of residential units proposed realistic and deliverable over the plan period?
- f) How and when will the proposed new educational facilities be delivered?
- g) What are the mechanisms and timescales for delivering the site?
- h) Is the allocation of the SDS essential to ensure the soundness of the Plan?

Matter 12: Good Design and Sustainable Placemaking – Strategic Allocation at Land East of Pyle (PLA5 and SP2(5))

Issue – Is the allocated Strategic Development Site soundly based and capable of delivering new residential and community development over the Plan period?

- a) What is the current use of the Strategic Development Site (SDS)?
- b) What is the proposed use of the SDS?
- c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?
- d) In light of the constraints, and having regard to the need to provide affordable housing, is SDS economically viable?
- e) Are the number of residential units proposed realistic and deliverable over the plan period?
- f) How and when will the proposed new educational facilities be delivered?
- g) What are the mechanisms and timescales for delivering the site?
- h) Is the allocation of the SDS essential to ensure the soundness of the Plan?