VOLUME 17

STATUTORY CONSULTEES PLUS OTHERS CONSULTATION RESPONSES

ID	Comment	Summary of changes being sought/proposed	
145	SOBJ4: To Protect and Enhance Distinctive Natural Places – OBJ 4c Ensuring there is sufficient capacity within the public sewerage system is an important element in protecting and enhancing the natural environment, whilst along with an adequate potable water supply and drainage infrastructure (including sustainable drainage systems) is key to ensuring new development sites are sustainable, viable and deliverable. As such, we welcome the provision of SOBJ 4 and its constituent specific objectives, in particular OBJ 4c.	None – welcome SOBJ4 and constituent specific objectives.	Comments noted.
434	Land east of Pencoed has been identified as a location for 770 residential units including affordable housing; a new primary school and nursery facility; outdoor recreational facilities as well as active travel routes and community facilities. Having spoken to a number of residents, concerns have been raised relating to the current capacity of local services such as the GP surgeries and dental services. It will be important that relevant stakeholders such as Pencoed Town Council and the county borough hold a review of current services and infrastructure and identify where there needs to be improvement in order to facilitate the increase in population as a result of the additional residential properties. As the replacement LDP highlights, the land east of Pencoed has been identified as a potential location for a primary school. It is incredibly disappointing that the council has not indicated as to whether or not this will be an English medium or Welsh medium school. Depending on the decision, it could have a further impact on traffic in the town given that if the primary school is English medium, it would likely feed into Pencoed comp. Further, I have been vocal over the past 2 – 3 years about the lack of Welsh medium education provision in the county borough,	Comments regarding Strategic Allocation PLA4: Land East of Pencoed, amenities and facilities within Pencoed, health care facilities, primary school, Moratorium	Comments noted. The Deposit Plan has been underpinned by the identification of th economic growth and housing provision, all of which have been based upon well judgements regarding need, demand and supply factors (See Appendix 42 – Back Strategy Strategic Growth Options). A range of growth Scenarios across the whole have been analysed and discussed within the Strategic Growth Options Background how the County Borough's demographic situation is likely to change from 2018-20 appropriate response for the Replacement LDP. As such the Replacement LDP iderequirement to enable a balanced level of housing and employment provision th patterns of growth, support existing settlements and maximise viable affordable hou. The distribution of growth is further evaluated and justified in the Spatial Strategy (See Appendix 43 – Background Paper 3). The strategy prioritises the development periphery of sustainable urban areas, primarily on previously developed brownfield on the delivery of the brownfield regeneration allocations identified in the existif Maesteg and the Llynfi Valley are still denoted as regeneration priorities the Regeneration Growth Areas. The ongoing commitment to brownfield development settlements accords with the site-search sequence outlined in Planning Policy Wa developmental pressure on Best and Most Versatile (BMV) agricultural land. Howev success in delivering development on brownfield regeneration opportunities remain deliverable sites (including some greenfield sites) are therefore required to implem housing in high need areas and ensure the County Borough's future housing require. The Replacement LDP apportions sustainable growth towards settlements that alreservices, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See Appendix 40 and employment opportately directed towards the Main Settlements of B with the grouped Main Settlement of Pyle, kenfig Hill and North Cornelly.

the most appropriate scale of rell informed, evidence based ackground Paper 2: Preferred ole Replacement LDP period and Paper. This has considered -2033 and informed the most identifies an appropriate plan that will achieve sustainable ousing delivery.

y Options Background Paper ment of land within or on the eld sites. It continues to focus sting LDP, hence, Porthcawl, through their designation as ent opportunities within these Wales and seeks to minimise ever, given the existing LDP's ably Bridgend and the Valleys aining. Additional viable and ement SP1, deliver affordable uirements can be realised.

Iready benefit from significant o enabling transit orientated Appendix 19) to establish a ehensive range of variables Bridgend and Pencoed along

especially in the Pencoed area. I would The plan preparation has involved the assessment of 171 sites. Each candidate site has been assessed against press on the council to ensure that the the criteria in the Candidate Site Assessment Methodology which was previously consulted upon (See Appendix potential primary school is a Welsh medium 13 - Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessment, sites were examined school as there are already 2 English based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, medium primary schools in Pencoed and existing use(s), accessibility, physical character, environmental constraints and opportunities. Site promoters the lack of provision of Welsh medium were asked to prepare and submit a number of technical supporting studies to demonstrate the site's education in the wider county is shameful. deliverability, sustainability and suitability. Proceeding this detailed assessment, only those sites deemed We only need to look at recent cases in appropriate were included for allocation in the Deposit Plan. As such, candidate site 219.C1 was considered as Pencoed to see that the current system is appropriate for allocation. failing parents. These parents are now facing the decision of sending their children As part of the proposed allocation of Land East of Pencoed, development will be subject to site-specific even further away to receive their education requirements including masterplan development principles and placemaking principles (See Deposit Policy in Welsh, or to opt for English medium PLA4 – Page 75). The provision of new residential units, including affordable dwellings, will be Incorporated education. There's a fundamental question alongside a new 1.5 form entry primary school, recreation facilities, public open space, plus appropriate of fairness here? Why should children in community facilities and commercial uses. Pencoed need to travel to receive their education in Welsh? A town the size of In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced. The IDP provides Pencoed should have a Welsh medium a single schedule of all necessary infrastructure without which the development of allocated sites for the primary school. Moving on, it is welcome anticipated quantum of proposed housing/employment uses within the plan period could not proceed. Such that the draft LDP suggests that the infrastructure includes transport, education, health, environmental management, utilities in additional to moratorium on developments west of the community and cultural infrastructure. railway will remain in place. I want to emphasis the point that residets feel that In terms of health, the Council has also been engaging with Cwm Taf Morgannwg University Health Board from this moratorium should remain for the the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution duration of this plan period, even if the of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Penprysg road bridge is replaced during the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide plan period. However, it's important that the comments in respect of those sites identified as suitable for future development and possible allocation in the current bottleneck on Hendre road is Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working resolved before we see the Penprysg bridge relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be replaced. A significant amount of residents key to service provision planning as site allocations with the Deposit Plan progress. have expressed their desire for the road to be widened, especially the section of the In relation to education, should PLA4: Land East of Pencoed development be adopted within the new Local road between Heol Wastadwaun and Min-y-Development Plan, a decision on language type for the primary provision (ie whether the school is Welsh or nant. I would welcome further consideration English-medium) would be undertaken in due course. to what happens to the town centre once the crossing is closed. There is scope for In terms of the moratorium, Background Paper 16: Development West of the Railway Line, Pencoed, makes use regeneration around the cenotaph which I'm of several recent studies focussed on the highway network in Pencoed to determine the requirement for the sure would be welcomed by residents. I existing moratorium on development, as prescribed by Policy PLA6 in the Bridgend Local Development Plan, to be retained in the emerging replacement Local Development Plan 2018 to 2033. It has been identified that would like to welcome the provision of greenspaces in the area. However I would significant assessment has been undertaken into developing a solution which is likely to require major be interested to know as to whether interventions to include the closure of the Hendre Road level crossing as well as a replacement Penprsyg Road consideration has been given to use the bridge with significantly improved capacity and active travel infrastructure. However, the available solutions are subject to many constraints which would need to be overcome through further assessment and design and will land known locally as the 'old brickyard' for green space development? I note the require collaboration of several statutory undertakers. There are also restrictions in terms of funding, with no planned expansion of the Park and Ride existing guarantees that the required costs for major intervention can be met over the replacement plan period. facilities, however there will be land left over It is therefore concluded that the existing development moratorium in Pencoed should be retained within the on the 'Old brickyard' that could be turned revised Local Development Plan 2018-2033 until a suitable transport intervention materialises. into a small park for the benefit of the community.

The Council is currently carrying out an initial public consultation on the Pencoed le road bridge, of which will allow members of the public and other stakeholders t concerns.
Whilst the replacement LDP Policy PLA8 (5) allocates and safeguards land for the ex and ride facility at Pencoed, no definitive plans have been worked up as of yet. Howe provide opportunities for effective interchange between active travel, public transp reduction in the length and number of car-borne journeys, especially for the jour convenient and efficient interchange between transport modes is vital for making sus attractive and practical to residents.

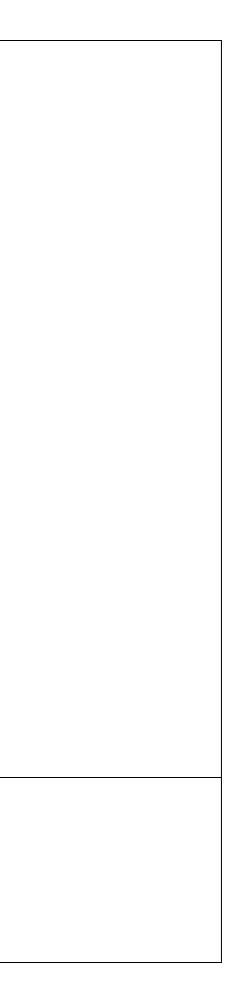
	itle: Do you have any comments to make on the growth strategy?					
ID	Comment	Summary of changes being sought/proposed				
139	It is noted that Deposit RLDP Policy SP1 'Regeneration and Sustainable Growth Strategy' seeks to make provision for a level of growth that achieves an equilibrium between the number of homes proposed (505 per year) and job opportunities expected (500 per year). NPTC are supportive of the proposed growth strategy which seeks to provide a balanced and sustainable level of economic growth to facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the Cardiff Capital Region and Swansea Bay Region.	Support growth strategy	Comments noted			
145	 SP1: Regeneration and Sustainable Growth Strategy We note that the Replacement LDP seeks to make provision for 9,207 new dwellings to deliver a requirement of 7,575 dwellings, along with the provision of 71.7 hectares of employment land. The prioritisation of land within or on the periphery of urban areas, in particular brownfield sites is generally more likely to result in less water and sewerage constraints than a greenfield approach, though this is location dependant. Regeneration and Sustainable Growth Strategy by Site Typology Regeneration Sites 	No proposed changes.	Comments noted. The Council has and will continue to work closely with Dŵr C Replacement LDP progresses and at planning application stage.			

level crossing and Penpyrsg to voice their views and/or

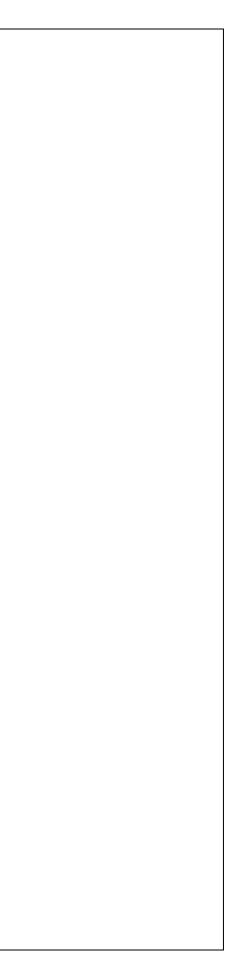
expansion of the existing park owever, such development will asport and cars to facilitate a ourney to work. Providing for ustainable travel options more

Cymru	Welsh	Water	as	the

	We welcome the inclusion of the text at para		
	4.3.55 that sites will need to be serviced by		
	existing infrastructure, and of a size to		
	contribute to infrastructure improvements		
	and/or new infrastructure. Dependant on		
	the size and location of these sites, we will		
	be able to advise of any water or sewerage		
	infrastructure constraints at Deposit stage.		
	Sustainable Urban Extensions		
	Manual and the inclusion of the text of a		
	We welcome the inclusion of the text at para		
	4.3.56 pertaining to the necessity for		
	improvements to existing infrastructure		
	and/or the provision of new supporting		
	infrastructure. Strategic sites will invariably		
	require water and sewerage infrastructure		
	improvements which may need to be		
	funded by developers if the sites are to		
	progress in advance of potential regulatory		
	investment. As such, we would welcome		
	early engagement with		
	landowners/developers to discuss potential		
	requirements on these sites.		
	Edge of Settlement		
	In line with the text at para 4.3.37, we		
	welcome the inclusion of text advising that		
	offsite infrastructure may be required to		
	serve Edge of Settlement sites – by their		
	nature, these sites will require water and		
	sewerage improvements which may need to		
	be funded by developers if the sites are to		
	progress in advance of potential regulatory		
	investment. As such, we would welcome		
	early engagement with		
	landowners/developers to discuss potential		
	requirements on these sites.		
142	Support in principle - Growth Strategy -	No proposed	Comments noted.
	Level of homes and jobs proposed	changes –	
		support the	
	The plan makes provision for 9,200	growth strategy in	
	dwellings to deliver a requirement of 7,575	principle	
	units (505 dpa), of which 1,977 are		
	affordable. The flexibility allowance in the		
	plan is 20%. The level of employment land		
	provision is 71ha to deliver 7,500 jobs.		



The level of housing proposed is 1,900 units above the Welsh Government 2018-based principal household projection. The 2018 principal projection would equate to an annual build rate of 378 units per annum, which is below recent and long-term trends. The housing requirement (7,575) is a reduction of 2,115 units from the adopted LDP of 9,690 homes.		
The proposed level of housing growth (505 dpa) is above the past 5 and 10-year build rates (440 and 460 per annum respectively). The Councils Housing Trajectory (Appendix 1, Table 3, Row K) states completions in the plan period to date average 467p/a, broadly in the line with what is proposed. The level of housing proposed is in general conformity with the National Development Framework: Future Wales (see Annex1).		
Policy ENT1 allocates 71.7ha of employment land to deliver 7,500 jobs (500 per annum) over the plan period. This represents an increase of approximately 2,505 jobs over the Preferred Strategy. The increase in jobs is attributed to the 2018- based Welsh Government projections and 2019 Mid-Year Estimates, which increased the working age population in Bridgend, specifically the return of the student cohort (Economic Evidence Base Update, Feb 21). Applying the growth in the younger age cohort to Experian's economic forecast model generated an increase of 7,500 employed people over the plan period. The Council has sought to plan positively for this number by ensuring there are employment opportunities for all 7,500 extra residents over the plan period, building on its role as a major regional employment hub and capitalise on the expanded labour supply to support the expansion of existing businesses/new start-ups.		
On balance, the Welsh Government considers the Council, along with other relevant policy considerations set out in paragraphs 4.2.6 – 4.2.8 (PPW, Edition 11),		

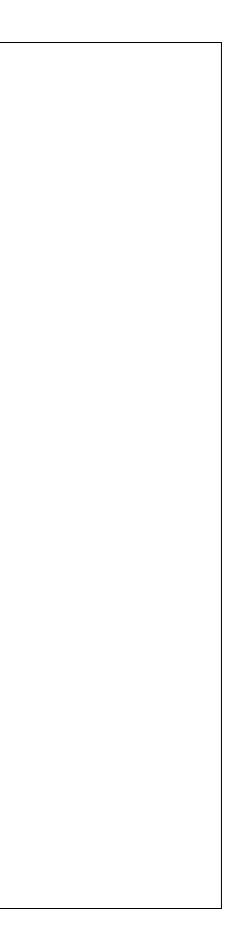


has taken the latest projections into	
account. The Welsh Government is of the	
opinion that the level of homes and jobs	
proposed is appropriate to the role of	
Bridgend as part of the South East Wales	
National Growth Area.	

Title:	Do you have any comments to make on the s	patial strategy?	
ID	Comment	Summary of changes being sought/proposed	Council response
139	NPTC are supportive of the spatial strategy which in order to help realise the regeneration aspirations and balance this with the need to deliver future housing requirements, apportions growth towards Main Settlements that already benefit from significant services, facilities and employment opportunities and within these settlements prioritises the development of land within or on the periphery of the urban area, primarily on previously developed brownfield sites. It is noted that the settlements of Maesteg and Pyle, Kenfig Hill and North Cornelly within close proximity of NPT are identified as Main Settlements. NPTC would welcome further involvement in discussions about the ongoing development of these settlements.	Support spatial strategy	Comments noted
145	SP2: Regeneration Growth Area and Sustainable Growth Area Strategic Allocations Whilst the Strategic Sites are likely to require hydraulic modelling on both water and sewerage networks owing to the number of units proposed, it may be that initial phases of development can commence prior to the need for this. We will be able to advise further as we are consulted via the Pre-Application consultation stage.	No proposed changes.	Comments noted. The Council has and will continue to work closely with Dŵr Cymru Welsh Wa Replacement LDP progresses and at planning application stage.
142	<u>Support in principle - Spatial Strategy -</u> <u>Scale and location of growth</u> The Council's Spatial Strategy ('Regeneration and Sustainable Urban	No proposed changes – support the spatial strategy in principle	Comments noted.

onse							
vork closely tage.	with	Dŵr	Cymru	Welsh	Water	as	the

Growth Strategy') directs the majority of growth to land within or on the periphery of urban areas, towards areas that benefit from, or already have the capacity to deliver good infrastructure, services, facilities, regeneration opportunities and connecting more widely with the opportunities afforded by the Cardiff and Swansea City Regions. As per the Councils analysis (Settlement Assessment 2021) on the role of function settlements (reflected in the settlement hierarchy in Policy SF1 and Table 6 and 7) the majority of development is proposed in the higher tier more sustainable settlements. Around 75% of housing and 90% of employment is proposed to be located in settlement/growth area/tiers 1 and 2 with 46% of housing and 70% of the employment located in the primary settlement of Bridgend. The Welsh Government has no fundamental concerns on the spatial distribution of housing and employment growth, which is in 'General Conformity' with Future Wales.		
Versatile Agricultural Land Bridgend have engaged with the Welsh Government regularly throughout the development of the LDP on land quality information, validation of surveys and Predictive ALC Map information. The plan notes a significant loss of 102.7ha. The Council has taken a pragmatic approach to protecting BMV land and minimising its loss in the plan. Allocations that would represent a loss of BMV have been well evidenced (Background Paper 15) for an overriding need (sequential test) and a balanced judgement has been made. In conclusion, the Welsh Government is of the view that the Council has demonstrated a pragmatic approach to considering BMV loss in the context of national planning policy and on that basis, no objection is offered.	the approach to protecting BMV land and	Comments noted.



	Do you have any comments to make on desig		
ID	Comment	Summary of changes being sought/proposed	Council response
208	In respect of the above consultation, on Page 60 under SP3 Good Design and Sustainable Place Making it states : All developments must "Minimise opportunities for crime to be generated or increased, whilst promoting community safety in accordance with Secure by Design principles;" As this is included in the LDP the only comment I would make in respect of the document is that it is Secured by Design not Secure. Thanks you for including Secured by Design in the document which is vitally important.	Change 'Secure by Design' to 'Secured by Design' in Policy SP3 criteria (f) on Page 60.	Comments noted. The correct reference is noted, and the amendment will be made.
145	SP 3: Good Design and Sustainable Place Making		
	We welcome the provision of criterion (I) of this policy. Adequate capacity within the public sewerage and water supply networks are key to ensuring new development sites are sustainable and deliverable. Mixed-Use Strategic Development Sites	No proposed changes to SP3, SP6 or PLA1-5.	Comments noted. The Council has and will continue to work closely with Dŵr C Replacement LDP progresses and at planning application stage. The Council re- public sewerage and water supply network capacity in ensuring new development deliverable.
	PLA1: Porthcawl Waterfront We welcome the inclusion of criterion 13 of Masterplan Development Principles.		
	PLA2: Land south of Bridgend (Island Farm) We welcome the inclusion of criterion 12 of Development Requirements.		
	PLA3: Land west of Bridgend We welcome the inclusion of criterion 14 of Development Requirements.		
	PLA4: Land east of Pencoed We welcome the inclusion of criterion 9 of Development Requirements.		
	PLA5: Land east of Pyle We welcome the inclusion of criterion 12 of Development Requirements. SP 6: Sustainable Housing Strategy		

r Cymru Welsh Water as the recognises the importance of nent sites are sustainable and

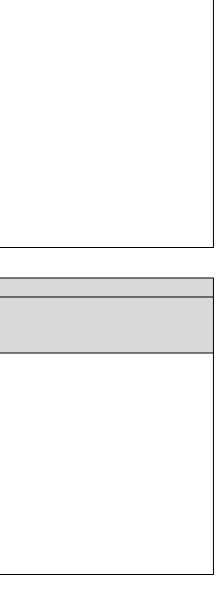
We can advise that there is no reason why a combination of Welsh Water's regulatory investment and developer funded infrastructure improvements cannot ensure the housing requirement cannot be delivered over the plan period. COM1: Housing Allocations Please see Appendix 1		
PLA8: Transportation Proposals Any proposals for new transport related development will need to take account of any water and sewerage infrastructure in the design stage of the proposal.	No proposed changes to PLA8 – emphasise proposals for new transport related development will need to take account of any water and sewerage infrastructure in the design stage of the proposal	Comments noted. PLA8 identifies (and where necessary), safeguards land for strate will provide improvements to the public transport network, make better use of the e permit appropriate reallocation of road space, which will deliver more sustainabl Borough. PLA8 is a development management policy framed within the context of S and Accessibility, which states that development must also be supported by appropria infrastructure. This includes water and sewerage infrastructure. SP10 also refere proposals must be supported by sufficient existing or new infrastructure, specifical Council has and will continue to work closely with Dŵr Cymru Welsh Water as the Re and at planning application stage.
 <u>Strategic Policy 7: Gypsy and Traveller</u> <u>Accommodation</u> <u>SP7 (1) Land off Old Coachman's Lane –</u> <u>3 pitches</u> Given the location of this proposed allocation adjacent to our Court Colman Service Reservoir, we request that we are consulted on any future proposals at the site as we require more detail (such as that forthcoming at the planning application stage) before we can respond fully to the proposal. Any proposal will need to take account of public health, dam safety, water quality, security and health and safety to ensure that the supply of water to and from the asset and any operational issues at or from the asset are not impacted by the proposal. Water supply 	No proposed changes to SP7 – request for future consultation on any development proposals.	Comments noted. SP10 references that all development proposals must be suppor new infrastructure, specifically referencing utilities. The Council has and will continu Cymru Welsh Water as the Replacement LDP progresses and at planning application

rategic transport schemes that ne existing highway network to hable travel within the County of SP5: Sustainable Transport opriate transport measures and ferences that all development fically referencing utilities. The Replacement LDP progresses

ported by sufficient existing or tinue to work closely with Dŵr ation stage.

There should be no issues in providing this site with a supply of clean water.	
Sewerage network	
There is no public sewerage in the vicinity of this site. As such, an alternative means of drainage will be required.	
SP7 (2) Land adjacent to Bryncethin Depot – 3 pitches	
Water supply	
There should be no issues in providing this site with a supply of clean water, though some level of offsite works will be required.	
Sewerage network	
There should be no issue in this site connecting to the public sewerage network, though some level of offsite sewers will be required.	
Wastewater Treatment Works (WwTW)	
There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development	

Title:	Title: Do you have any comments to make on the active, health, cohesive and social communities policies?						
ID	Comment	Summary of changes being sought/proposed	Council response				
139	NPTC support the proposed framework for the provision and protection of well-located, good quality, tourism, sport, recreation and leisure facilities in order to diversify tourism in the County Borough. Given the links between the regeneration/ tourism development in Maesteg and the Afan Forest, we would suggest that collaborative discussions should take place between our authorities regarding proposed tourism developments and facilities within that area.	and social communities policies	Comments noted				



145	COM13: Provision of Cemeteries	No proposed changes to	Comments noted. SP10 references that all development proposals must be support new infrastructure, specifically referencing utilities. The Council has and will continue
	Any proposals for new cemetery development will need to take account of any water and sewerage infrastructure in the design stage of the proposal.	COM13 or SP10 – emphasise proposals for new cemetery	Cymru Welsh Water as the Replacement LDP progresses and at planning application
	SP10: Infrastructure	development will need to take account of any	
	We applaud the provisions set out in this policy and the supporting text that follows. As indicated above, developers may be required to fund improvements to water and sewerage infrastructure should they wish to bring forward a development site in advance of our regulatory investment.	water and sewerage infrastructure in the design stage of the proposal	
	With specific regard to water and sewerage infrastructure, where insufficient capacity is available and where no reinforcement works are programmed within the respective Capital Investment Programme, the requisition provisions (of the Water Industry Act 1991) can be entered into for the water and sewerage infrastructure. The requisition provisions do not apply in the instance of WwTW, and as such planning obligations may be necessary.		
	Accordingly, it is pleasing to note the wording of this policy, and the inclusion of 'utilities' as one of the specific types of infrastructure.		
	Category B - Flooding	No proposed	Comments noted.
	The Strategic Flood Consequences Assessment (2020) identifies that some of the strategic sites and housing allocations are subject to flood risk. These sites are categorised as 'amber' in the assessment where it 'may' be possible to develop the site in line with the requirements in TAN15 subject to a detailed site-specific Flood Consequence Assessment and satisfaction of the Justification Tests as required by Policy DNP9. The flood risk for each Strategic Site is clearly set out in Appendix	changes, although advice to: i) continue to engage with NRW and work towards a Statement of Common Ground (SOCG) making clear NRWs view on any sites affected and mitigation	An updated SFCA was commissioned post Deposit Stage and this considered the in Map for Planning and draft Technical Advice note 15. A check of all proposed sites v Stage and there are updates on three sites in particular: Parc Afon Ewenni was subject to robust re-assessment of its sustainability, deliverable in the same manner as all other candidate sites and was considered deliverable at D revised draft Technical Advice Note 15, supported by the new Flood Map for Plannin flood risk issues across the Parc Afon Ewenni site. While the Flood Map for Plannin planning purposes until June 2023, additional site-specific modelling work has fail constraint can be overcome in the short term. As such, Parc Afon Ewenni can no long to delivery of the housing requirement and has been removed from the housing traje
	5 of the plan, where the Council is of the view the risk of flooding can be overcome through flood defence schemes and master	measures proposed	The coastal setting of the Porthcawl Waterfront site makes it particularly important climate change on tidal flood risk as the majority of the site is susceptible to tida forthcoming revised TAN15 acknowledges that there are some large urban communi-

ported by sufficient existing or tinue to work closely with Dŵr ation stage.

e impacts of the revised Flood s was conducted post Deposit

rability and viability credentials at Deposit Stage. However, the uning, has revealed substantial nning has no official status for failed to demonstrate that this onger be relied on to contribute rajectory.

ant to consider the impacts of dal flooding. The draft of the unities already located in areas

planning. The Infrastructure Delivery Plan identifies key flood defence infrastructure required before key sites can be delivered. We strongly advise the LPA continue to engage with NRW on these key aspects and work towards a Statement of Common Ground (SOCG) making clear NRWs view on any sites affected and mitigation measures proposed. A SOCG of this nature has worked well in other examinations in Wales to assist all parties to understand the issues, potential/outstanding conflicts with national policy and the implications of the timing, phasing and delivery of infrastructure / mitigation measures. The Council should continue to ensure no highly vulnerable development is allocated in Zone C2. Whilst development in Zone C1 may be acceptable in policy terms, the LPA will need to demonstrate allocations are suitable and deliverable in line with mitigation measures. The LPA should take account of the revised TAN15 and its implication on policies and allocations in the plan. If housing sites or units are affected by flood risk and are no longer considered appropriate for allocation in the plan, the authority should ensure that any housing lost is replaced with an equal number in the same strategy area to deliver on the plan requirement. The revised TAN15 is anticipated to be published September 2021.	and ii) take account of the revised TAN15 (when published) and its implication on policies and allocations in the plan	at risk of flooding and investment in flood defence infrastructure will be required to kee safe. Following dialogue with Welsh Government, Coastal Risk Management Progra for major flood defence works at Porthcawl. Phase 1 (Eastern Promenade) is design area and existing development to the north. Phase 2 (Coney Beach) encompasse measures along the Coney Beach frontage to safeguard and enhance the existing floo provided by the existing ad-hoc revetment. Implementation of these works will community from flooding and the effects of flooding. However, they also have sign wider social, economic and environmental benefits to contribute towards the statu Well-being of Future Generations (Wales) Act 2015. The greatest overall value can these investments in flood defence infrastructure with other investment in active trave improvements and regeneration-led development. The existing flood defences comt new flood defence works has rendered the site a Defended Zone and will provide a realise wider regeneration and placemaking benefits for the area through the delive On this basis, it is considered that the Porthcawl Waterfront site can be developed requirements of the future revised TAN15. The defences are expected to provide a significantly reducing the risk of flooding in areas within Zone 3 and respective area all development in the area will necessarily be accompanied by a Flood Conseque the new development incorporates resilience to remain dry and safe as per the tol the future revised TAN15. The Replacement LDP's housing trajectory has factored in the completion of coastal flood defence works before forecasting dwelling completior example of how to deliver a high priority brownfield regeneration scheme in a Defen the forthcoming revised TAN15. A SoCG will be pursued with NRW to formalise this The Flood Map for Planning has been updated around Pencoed College and there a flood risk) that would prevent the Land East of Pencoed site coming forward.
Category C - Gypsy and Traveller Accommodation Assessment (GTAA) – Status and the delivery of sites – Policy SP7 The Council's Gypsy and Traveller Accommodation Assessment 2020 (GTAA) covers the period 2018-2033 identifying a need of 7 pitches. To ensure compliance with legislation and planning policy, the study should be formally agreed by the relevant Welsh Government Minister prior to the examination. The Council has clarified via Background Paper 18: Gypsy	No proposed changes, although advice to: i) formally agree the GTAA with the relevant Welsh Government Minister and ii) demonstrate the related	The GTAA was approved by Cabinet and submitted to Welsh Government for app order to ensure sufficient time for formal sign off by the relevant Welsh Minis consultation. Initial feedback was received form Welsh Government in April 2021, fo throughout May 2021 and the Council has responded to all queries raised by Welsh remains committed to progressing the GTAA to formal approval and has underta enable this to happen. When the GTAA was completed, the total estimated pitch provision needed for Gyps pitches up until 2033. Since then, one family has met their accommodation needs of site, leaving a remaining need for six pitches over the Plan period. This need stems three pitches per family). One of these families has recently received planning conse existing site and meet their accommodation needs (planning application P/21/677/F remaining need for 3 pitches, which the Council considers can be appropriately accord proposed allocation at Court Colman (SP7(1)), which is already in the family's owne

keep such existing populations gramme funding was secured igned to protect the Salt Lake ses flood and coastal erosion lood protection to the frontage ill better protect the existing ignificant potential to achieve tutory well-being goals of the an be achieved by combining vel infrastructure, public realm mbined with completion of the a coincidental opportunity to very of Porthcawl Waterfront. ed in full compliance with the a high standard of protection; reas in Zone 2. Nevertheless, uence Assessment to ensure olerable conditions set out in in appropriate timescales for ions. This presents a practical fended Zone in the context of nis position.

e are no reasons (relating to

pproval in December 2020, in hister prior to Deposit Stage follow up meetings were held lsh Government. The Council rtaken everything possible to

ypsies and Travellers was 7 on an existing authorised ns from two families (i.e., nsent to intensify their /FUL refers). This leaves a ccommodated by the original nership. The Council has

and Traveller Site Options (para 4.4) and Table 9 of the Deposit plan the most up to date need figure stands at 6 pitches, of which 5 pitches are immediate (by 2025). Policy SP7 allocates two permanent sites of three pitches to meet the remaining need identified over the remaining plan period. The Council will need to demonstrate at the examination that the sites can be delivered in the identified timescales.	allocations can be delivered in the identified timescales.	liaised directly with this family to ensure the site is deliverable. Refer to the Gypsy a Background Paper.
Category C - Affordable Housing Exception Sites	Wording changes to Policy COM5 in line with PPW(11) and TAN2.	Comments noted and accepted. Policy COM5 will be amended to include "within or of 'local need' will be included in the reasoned justification.
 <u>Category C - Delivery and Implementation</u> The Council has undertaken a significant amount of engagement and technical work in respect of place making, viability, delivery and infrastructure to inform the Deposit Plan in line with the DPM (Edition 3). This is supported (subject to the comments in this annex) and puts the LPA in a good position moving to examination, namely: Engagement work with key housing and viability stakeholders groups to achieve broad consensus on the timing of phasing of sites and the viability development costs for the plan wide appraisal; The completion of site specific viability testing. However, we note these appraisals 	Advice to: i) Include site- specific viability testing information within the evidence base when the plan is submitted for examination ii) Incorporate a visual element to the Key Site PLA 1-5 policies through masterplans/ concept/	Comments noted and accepted. Appropriately anonymised site-specific viability released within the evidence base, masterplans will be appended to the Plan in sup the Infrastructure and Delivery Appendix will be expanded to include key site remaining housing allocations listed in Policy COM1 and employment sites. The three site promoters progressing the housing allocations in Maesteg and the COM1(5)) have now signed a collective Statement of Common Ground. The devel latent demand in the area will allow for the delivery of COM1 (3), (4) and (5) in para also collectively instructed Asbri Transport to undertake an assessment on the development on Junction 36. In summary, the collective impact of the development to the operation of the junction and the local facilities in Pont Rhyd-y-Cyff, and Mae attractor for the site, enabling the development to contribute towards the regeneratio promoters have also undertaken further consultation with Dŵr Cymru Welsh Water in the network to accommodate the collective development. This is set out in further Common Ground that accompanies this submission.

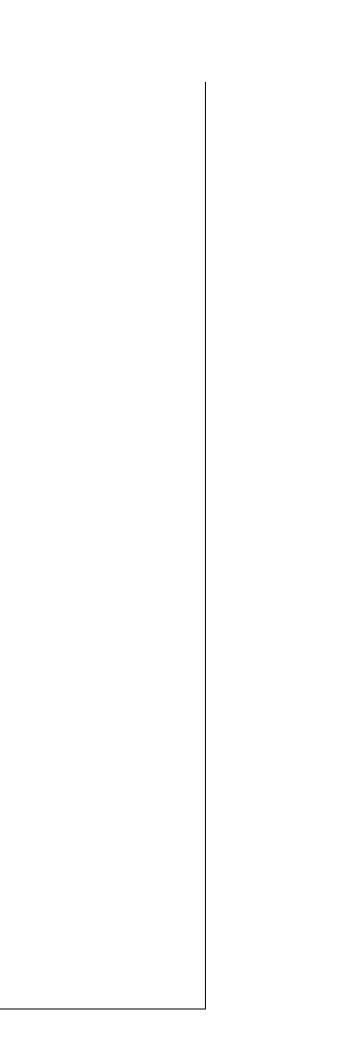
and Traveller Site Options

or adjoining" and the definition

lity testing information will be support of Policies PLA1-5 and ite-specific information for all

the Llynfi Valley (COM1(3) to velopers are confident that the parallel. The three parties have the cumulative impacts of the ent is not considered significant faesteg will be a significant trip ation of the wider area. The site tter to confirm there is capacity rther detail in the Statement of

 do not form part of the evidence base and should be made available, in an appropriate format, when the plan is submitted for examination; The inclusion of detailed Strategic Site policies and placemaking principles supported by an Infrastructure Plan setting out the costs, funding and phasing of each Strategic Site, including social and physical infrastructure requirements over the plan period; A clear articulation of the spatial distribution of housing and supply by component and settlement category; The inclusion of a housing trajectory and supporting tables on the timing and phasing of all allocations and sites; Detailed urban capacity study to support the assumptions on small and windfall sites. The examination will need to consider whether the plan and its appendices contain sufficient information in relation to the delivery of all housing sites. Specifically, whether key information in the Infrastructure Plan and other background papers should be included in the plan and/or its appendices. We have the following comments: 	schematic frameworks iii) Expand the Infrastructure and Delivery Appendix to include key site-specific information for all remaining housing allocations listed in Policy COM1 and employment sites. This should include implications arising from capacity issues at Junction 36 of the M4, where relevant.	
• The Council considers many of the allocations are well advanced in the master planning/ pre-application process. The plan would benefit if there were a visual element to the Key Site PLA 1-4 policies through masterplans/concept/schematic frameworks as set out in the DPM (Table 11, page 92). This will enable all parties to understand how the sites will be developed in broad terms, such as proposed land uses, access, infrastructure requirements, constraints and areas of protection. We would direct the LPA to adopted plans which have embedded this approach (Swansea, Cardiff, Neath).		

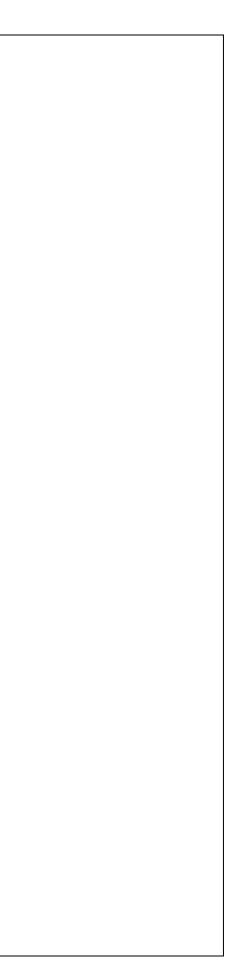


• The Infrastructure and Delivery Appendix (Appendix 5) sets out key site-specific information for the Strategic Sites only. More detailed information should be included on all remaining housing allocations listed in Policy COM1 and employment sites. This will set out what is expected from the development and the costs in bringing the site forward.				
• The Infrastructure Plan identifies that housing allocations in Maesteg and the Llynfi Valley (COM1(3) to COM1(5)) have limited capacity at the wastewater treatment works and upgrades will be costly. The Council, through the Implementation Appendix, should explain what infrastructure is required and the implications on the timing and phasing of housing allocations in these areas. The appendix should also explain any implications arising from capacity issues at Junction 36 of the M4.				
• Statements of Common Ground (SoCG) with developers on the Strategic Sites and the relevant statutory bodies such as NRW and Welsh Water would be advantageous to support the plan at examination.				

Title:	Title: Do you have any comments to make on the employment strategy?							
ID	Comment	Summary of changes being sought/proposed	Council response					
145	 SP11: Employment Land Strategy, ENT1: Employment Allocations, ENT2: Protection of Employment Sites & ENT5: Former Ford Site The following provisions are applicable to all individual development plots located within allocated and protected employment sites: We will work with your authority to support sustainable economic development, however your authority and potential developers should be aware that the obligations of a water and sewerage 	No changes proposed.	Comments noted. The Council has and will continue to work closely with Dŵr C Replacement LDP progresses and at planning application stage.					

Cymru Welsh Water as the

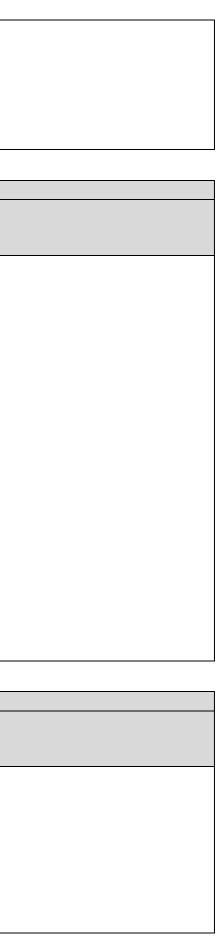
undertaker extends to 'domestic' supplies only. Where an employment allocation results in higher demands of water supply and/or trade effluent discharges we recommend and welcome early consultation with Welsh Water.		
• The individual plots available for development can represent a substantial area of land for which the potential demands upon our assets are unknown at present. It is essential that we understand these demands to allow us to assess the impact on our assets. It may be necessary for water and/or sewerage modelling assessments to be undertaken at the developer's expense to establish where the proposed development could connect to the existing networks, and to identify and required infrastructure improvements.		
• Water mains and/or sewerage infrastructure required for any potential development site can be acquired through the requisition provisions of the Water Industry Act 1991 (as amended).		
• Welsh Water has rights of access to its assets at all times. Where there are water mains and/or sewers crossing sites then protection measures in respect of these assets will be required, usually in the form of an easement width or in some instances a diversion of the asset.		
• If any development site gives rise to a new discharge (or alters an existing discharge) of trade effluent, directly or indirectly to the public sewerage system, then a Discharge Consent under Section 118 of the Water Industry Act 1991 is required from Welsh Water. Please note that the issuing of a discharge consent is independent of the planning process and a consent may be refused despite planning permission being granted.		
ENT11: Energy Efficiency Provision Within the Design of Buildings		



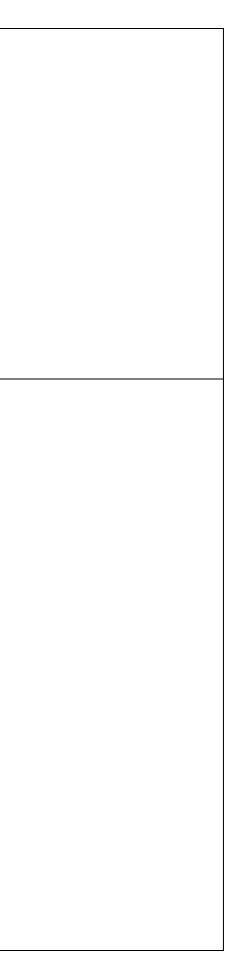
Ensuring we can maintain a regular supply of water to customers can be a challenge, particularly at peak demand times and as such we support the provisions of this policy, in particular criterion 7 with regard to water reuse and recycling and rainwater	
harvesting.	

Title:	Do you have any comments to make on retail	centres and develop	ment policies?
ID	Comment	Summary of changes being sought/proposed	Council response
139	NPTC support the retailing, commercial and service centre policies within the Deposit RLDP (Policies SP12; ENT6-91) which seek to retain a retail core within the Primary Shopping Areas and provide flexibility to accommodate and respond to changing retailer/ occupier requirements and demands over the Plan period. Given that Maesteg acts as an important centre for those living in the Upper Afan Valley, NPTC welcome the recognition in the Deposit RLDP (Paragraph 5.4.49) of enabling opportunities to improve the quality of the town centre environment, redevelop prominent vacant units for retail or other complementary uses and expand the range of commercial leisure uses to improve the performance of the centre, diversify the range of services and enhance the night time economy through expanding the food and drink offer.	Support retail centres and development policies	Comments noted

Title:	Title: Do you have any comments to make on the renewable energy, mineral resources and waste management policies?						
ID	Comment	Summary of	Council response				
		changes being					
		sought/proposed					
164	In January 2021 the Coal Authority's Executive Leadership Team reviewed the Coal Authority's position on surface coal resource, to ensure that it is most appropriately aligned with the present political and economic climate. It was noted that there is no legislative basis to justify the continuation of our previous position towards the safeguarding and prior		Comments noted				



	extraction of coal reserves. The conclusion of this review is that the Planning team will no longer request that development plans include policies to safeguard surface coal resource nor to promote its extraction or the extraction of associated unconventional hydrocarbons. Going forward, all decision making regarding the safeguarding of surface coal resource will lie with the relevant authority. It is considered that this is a positive step forward, which recognises those authorities' superior knowledge of local circumstances and responsibility for local environments and communities. This supports the Coal Authority's own mission statement of making a better future for people and the environment in mining areas.		
139	NPTC note that in line with national policy and guidance, BCBC are seeking to set ambitious renewable energy deployment targets to maximise the use of local resources available in the County. We support Deposit RLDP Policies SP13 and EN10-EN112 which seek to maximise the energy efficiency of new development, integrate energy generation into wider development proposals, and ensure that low carbon heating systems are installed. NPTC support the approach taken in Deposit RLDP Policy ENT10, noting in particular the conformity with Future Wales Policy 16 'Heat Networks' requirement for planning applications for large scale developments to prepare an Energy Masterplan to establish whether a heat network is the most effective energy supply option. With regards to wind farm development, we note that Future Wales Pre-Assessed Area for Wind Area 9 crosses the County Boroughs. As noted in Paragraph 5.4.84 of the Deposit RLDP, Future Wales states that communities should be protected from significant cumulative impacts to avoid unacceptable situations whereby, for example, smaller settlements could be potentially surrounded by large wind schemes. Given that the Pre- Assessed Area crosses both boundaries,	policies	Comments noted



	we would suggest that it would be beneficial		
	to work collaboratively and consistently to		
	consider the approach to wind within this		
	Pre-Assessed Area.		
145	P4: Mitigating the Impact of Climate	No changes	Comments noted. The Council has and will continue to work closely with Dŵr Cymru Welsh Water as the
145	Change	proposed.	Replacement LDP progresses and at planning application stage.
	Change	proposed.	Replacement LDP progresses and at planning application stage.
	We welcome the inclusion of criteria 6.		
	Welsh Water operate wastewater treatment		
	works (WwTW) and Combined Sewer		
	Overflows (CSO) and must comply with		
	consenting levels set out by the		
	environmental regulator Natural Resources		
	Wales (NRW). As such, minimising pollution		
	from wastewater is something that we		
	strongly believe in and adhere to. We also		
	welcome the inclusion of criterion 7 of this		
	policy. Disposing of surface water in a		
	sustainable manner will ensure that it will		
	not communicate with the public sewerage		
	network, thereby having the effects of not		
	only protecting the environment and		
	reducing flood risk, but also ensuring there		
	is sufficient capacity in the public sewerage		
	network for foul-only flows from		
	development sites. We are pleased to note		
	and welcome the inclusion of the text under		
	para 5.2.46. From a water supply		
	perspective, Bridgend CBC area is within		
	our Tywi Conjunctive Use System (CUS)		
	Water Resource Zone (WRZ). Water is		
	abstracted from the River Tywi at		
	Nantgaredig and pumped to our Felindre		
	Water Treatment Works (WTW) which in		
	turn supplies Bridgend. Our Final Water		
	Resources Management Plan (2019) which		
	looks ahead to 2050 doesn't anticipate		
	there being any significant concerns in Tywi		
	CUS WRZ.		
	This does not however mean that there are		
	not any localised issues on the water supply		
	network, or that infrastructure is sufficient to		
	supply proposed larger development sites		
	such as Urban Extensions. From a		
	wastewater network and treatment		
	perspective, we are pleased to note that the		
	para includes reference to ensuring there is		
1			

	sufficient wastewater network and WwTW capacity to serve new development		
	SP14: Sustainable Development of Mineral Resources We welcome the provisions of this policy, and in particular criterion 6. We would request that a criterion is added to ensure that any minerals extraction also take account of the location of our water and sewerage assets.	Proposed change to SP14: include a criterion to ensure that any minerals extraction takes account of the location of water and sewerage assets.	Comments noted. The Replacement LDP Policy SP14 will be revised accordingly.
142	<u>Category C - Minerals</u> The second review of the Regional Technical Statement (RTS2) has been endorsed by Bridgend Council identifying no allocations are required in the plan for the production of crushed rock or sand and gravel. It is a requirement of the RTS2 for all authorities, including Bridgend Council, to agree a Statement of Sub-Regional Collaboration (SSRC) on their contribution to the future provision of aggregate production. All authorities in the Cardiff City Sub-Region (LDP, paragraph 5.4.107) have agreed a SSRC but the SSRC does not form part of the Council's evidence base and this must be included when the plan is submitted for examination.	Include a Statement of Sub- Regional Collaboration within the LDP evidence base	Comments noted. The Council will seek to resolve this issue before the plan is subn
	Policy ENT14 seeks to control development within mineral buffer zones around existing quarries and mineral operations. Whilst the quarries and their buffer zones have been identified spatially on the proposals map, there is no corresponding list in Policy ENT14. This list should usefully be included in the policy to clearly identify the location of the mineral operations and their buffer zones.	Amend Policy ENT14 to identify the location of the mineral operations and their buffer zones	Comments noted and accepted. A corresponding list will be added within Policy EN

bmitted for examination. NT14.

Title:	Do you have any comments to make on the n	atural and built envir	onment policies?
ID	Comment	Summary of changes being sought/proposed	Council response
145	 DNP8: Green Infrastructure We support the proposal to maximise the amount of green infrastructure on site, and in particular through the provision and integration of SuDS related infrastructure. DNP9: Natural Resource Protection and Public Health We welcome the inclusion of criterion 4 (Water Pollution) and the subsequent supporting text – the protection of water resources are key in ensuring we maintain a safe, healthy and reliable water supply. 		Comments noted. The Council has and will continue to work closely with Dŵr Replacement LDP progresses and at planning application stage.

Title:	Title: Do you have any comments to make on the key proposals? Maesteg and the Llynfi Valley					
ID	Comment	Summary of changes being sought/proposed	Council response			

Title:	Do you have any comments to make on the k	ey proposals? Portho	cawl, Pyle, North Cornelly and Kenfig Hill	
ID	Comment	Summary of	Council response	
		changes being		
		sought/proposed		
182	The ultimate test of the soundness of the	Concerns	Comments noted. The Deposit Plan has been prepared in accordance with Welsh	
	LDP rests with its compatibility with its	regarding	Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and i	
	visions and objectives. Below are excerpts	Strategic	underpinned by robust evidence to ensure that plans are effective and deliverable an	
	of the visions and objectives for the future of	Allocation PLA1:	as defined in national policy set out in Planning Policy Wales (PPW).	
	Porthcawl. Porthcawl Civic Trust Society is	Porthcawl		
	of the opinion that BCBC's intention to build	Waterfront	The Deposit Plan has been underpinned through the identification of the most app	
	in excess of 1,115 dwellings within		growth and housing provision, all of which have been based upon well informed, e	
	Porthcawl will not encourage tourism		regarding need, demand and supply factors (See Appendix 42 – Background F	
	neither will it achieve the overarching		Strategic Growth Options). A range of growth scenarios across the whole Replacer	
	aspiration to create a premier seaside resort		analysed and discussed within the Strategic Growth Options Background Paper. T	
	of regional significance. Most tourists to		County Borough's demographic situation is likely to change from 2018-2033 and inf	
	Porthcawl arrive by cars via Junction 37 off		response for the Replacement LDP. As such the Replacement LDP identifies an a	
	the M4 and use Salt Lake as a car park		to enable a balanced level of housing and employment provision that will achieve sug	
	which currently holds over 1,000 cars. The		support existing settlements and maximise viable affordable housing delivery.	
	loss of Salt Lake as a car park will deter			
	visitors to Porthcawl, as they will be unable		The distribution of growth is further evaluated and justified in the Spatial Strategy	
	to park and will find it easier to just travel to		(See Appendix 43 – Background Paper 3). The strategy prioritises the developme	
	the next M4 Junction and enjoy Aberavon.		periphery of sustainable urban areas, primarily on previously developed brownfield	

Cymru Welsh Water as the

sh Government Development d revise a development plan, and contribute to placemaking,

appropriate scale of economic d, evidence based judgements d Paper 2: Preferred Strategy cement LDP period have been . This has considered how the informed the most appropriate n appropriate plan requirement sustainable patterns of growth,

y Options Background Paper ment of land within or on the eld sites. It continues to focus

The concept of using the lack of car parking on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as as a deterrent for people using cars to travel is admirable, but ill conceived and does not Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these take into consideration the rapid move away settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise from using fossil fuels to power cars, the developmental pressure on Best and Most Versatile (BMV) agricultural land. future will see electric and hydrogen cells powering cars which will still need a place to The Replacement LDP apportions sustainable growth towards settlements that already benefit from significant park. The majority of employment in services, facilities and employment opportunities and are most conducive to enabling transit orientated Porthcawl is tourism related, the draft LDP development. As such, a Settlement Assessment has been undertaken (See Appendix 19) to establish a will only provide 40 jobs at the proposed Aldi sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables the store. Urbanisation by building in excess of Replacement LDP will maintain Porthcawl's role as a Main Settlement capable of supporting regeneration-led 1,115 dwellings will not increase tourism growth, demonstrating capacity for sustainable growth based on its accessibility, availability of amenities and and therefore not increase employment. employment provision in the context of its existing population base. Vision and Objectives relating to Porthcawl NR3 Porthcawl, in its pivotal position on the The plan preparation has involved the assessment of 171 sites. Each candidate site has been assessed against Swansea Bay waterfront, should maintain the criteria in the Candidate Site Assessment Methodology which was previously consulted upon (See Appendix 13 - Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessment, sites were examined and enhance its role as a vibrant and based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, distinctive tourism and leisure destination. existing use(s), accessibility, physical character, environmental constraints and opportunities. Site promoters The Porthcawl Waterfront LS16 Regeneration Site will need to be delivered were asked to prepare and submit a number of technical supporting studies to demonstrate the site's deliverability, sustainability and suitability. Proceeding this detailed assessment, only those sites deemed to revitalise the town as a premier seaside resort. OBJ 1d To realise the potential of appropriate were included for allocation in the Deposit Plan. Porthcawl as a premier seaside and tourist destination by prioritising the regeneration As part of the proposed allocation of Porthcawl Waterfront, development will be subject to site-specific of its waterfront and investing in key requirements including masterplan development principles and placemaking principles (See Deposit Policy infrastructure. This will also improve the PLA1 – Page 63). The provision of new residential units, including affordable dwellings, will enable the delivery attractiveness of the town as a place to live of other vital regeneration requirements comprising flood defences, public open space, leisure, enhanced active and work, whilst enhancing the vibrancy of travel links plus education, retail and community facility provision. the Town Centre. Porthcawl 4.3.13 The key to the area's success is to balance the A Placemaking Strategy has been developed and produced of which provides the framework to deliver the nature of development proposed with the broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the interests of tourism and that of the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open environment. PLA1: Porthcawl Waterfront, space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented 1,115 residential units. Porthcawl Town Centre 5.4.50 Porthcawl has been the focus with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical of long-established plans for tourism-led development of the waterfront in this manner will improve the attractiveness of the town as a place to live and regeneration focused along the waterfront. work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader Tourism 5.4.127 Future Wales emphasises settlement of Porthcawl to thrive and prosper. the importance of tourism as part of the foundational economy A key objective of In terms of Salt Lake, development will include a new food store, residential (including affordable housing), the Welsh National Marine Plan is to supporting commercial uses and leisure. With regards to leisure, an area north of the harbour within Salt Lake 'recognise the significant value of coastal will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the tourism and recreation to the Welsh site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. economy and well-being and ensure such Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and activity and potential for future growth are better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but appropriately safeguarded'. 1. To produce also act, with others, to set a quality benchmark which will also need to be achieved elsewhere. high quality sustainable places. 1c. To realise the potential of Porthcawl as a Mixed-use development will be encouraged throughout the development. Commercial units will be considered premier seaside and tourist destination on the ground floor if there is market demand for such uses. Retail uses, restaurants and cafes will be particularly which capitalises on the regeneration of its encouraged. This mix of uses will help bring life and vitality during the day and into the evening.

waterfront. 1.19 Porthcawl Regeneration	
Area COM 1(25) This 48 hectare brownfield	Sandy Bay will accommodate public open space, residential, education provision a
waterfront site provides a significant	open space and recreation, it's acknowledged that such provision is considered in
opportunity through comprehensive	being, therefore the development should aim for standards in excess of the mini
regeneration to transform Porthcawl into a	development of Porthcawl Waterfront to Green Infrastructure and Outdoor Recreation
premier seaside resort. 4.16 Porthcawl has	with Policy COM10 and Outdoor Recreation Facilities and New Housing Developme
been the focus of long-established plans for	Guidance. s of open space. It is envisaged that significant public spaces will be cr
tourism-led regeneration focused along the	element of the development, predominately within the Griffin Park Area (incorporatin
a	
waterfront. Porthcawl benefits from primary	Griffin Park). This extension of Griffin Park could be utilised for events and activities fair. A significant expansion of Griffin Park, to provide amenities for the residential are
road connections to the wider strategic road	
network (the M4). 3. Vision and Objectives	framework. The expanded Griffin Park, in turn, leads to the Relic Dunes on the site's
Regeneration led growth will also be channelled towards Porthcawl through	linear tapered public open space/residential square is proposed to spring from the "grand" acting for the residential development around the space. Elegenberg on S
-	"grand" setting for the residential development around the space. Elsewhere on S open spaces will be provided. LAPs, LEAPs and NEAPs will also be incorporated
redevelopment of its waterfront to capitalise on the town's role as a premier seaside and	space. However, exact locations of open space will be determined at the formal plan
	seafront will also be clearly defined by the introduction of a potential recreational
tourist destination. Several Key Issues and	
Drivers of the Replacement LDP (notably	links seamlessly with the Eastern Promenade.
NR3 and LS16) highlight the importance of maintaining and enhancing Porthcawl's role	Additionally, there are plans for creating new facilities at Cosy Corner, including cor
as a vibrant and distinctive tourism and	
leisure destination through re-developing	creating employment opportunities. The plans for Cosy Corner include an all-new s which will feature new premises suitable for retail and start-up enterprises. The cour
the Waterfront Regeneration Area and	meeting space for community use, a parade square for the Sea Cadets and an offic
capitalising on its pivotal position on the	well as changing facilities for users of the nearby marina. If funding allows, plans
Swansea Bay waterfront. This Society	enhance the scheme with new landscaping, public seating, a children's play area and
strongly objects to the removal of the green	of providing comfortable outdoor shelter from rain and the sun.
wedge policy as it is protection against urban sprawl. "Proposed Green Wedges	Strategic Policy 16: Tourism and supporting development management policy
The Replacement LDP will not feature a	development. The LDP will also provide the framework for the provision and prot
green wedge policy, therefore proposals for	quality, tourism, sport, recreation and leisure facilities and to diversify tourism in the
green wedges will not be taken forward (see	thereby contributing to the Aims and Priorities of the Bridgend County Destinatio
Green Wedge Review Background Paper).	2022) (See Appendix 30).
Site Site Area (Ha) Candidate Site Ref No.	
Settlement Settlement Hierarchy Category	In terms of car parking, it's acknowledged that a sound and robust parking strategy
Proposed Use of Site Danygraig Avenue	
(Land East of) 5.21 182.C1 Porthcawl	of the regeneration. As part of the strategy, the site will accommodate a new multi st
Newton Green Wedge." This referral to the	Hillsboro car par enabling more ground floor space to be given over to publi
Maritime Centre should be removed as it no	Consideration should be given to alternative future uses as, overtime, the aspiration Waterfront will be principally by public transport including park and ride schemes, g
longer viable. 4.25 Some substantial	of private vehicles requiring parking facilities. Consultations confirmed widespread
improvements to Porthcawl's waterfront	multi storey car park whilst recognising it will change the immediate outlook of prop
leisure offer have already been delivered or received planning approval the	The authority has a strong desire to facilitate and actively appeurage a model shi
	The authority has a strong desire to facilitate and actively encourage a modal shi
Porthcawl Maritime Centre was approved in November 2018 and will provide and will	public transport and the provision of a new bus terminus is integral to this as well Future Wales Plan. As such a new 'bus terminus' may also be located along the P
November 2018 and will provide and will	Future Wales Plan. As such, a new 'bus terminus' may also be located along the P
include a coastal science and discovery	as a boulevard where visitors and locals could arrive at, and depart from the regent
centre, cafe, wine bar, roof terrace and	The location of the bus terminus will enable access towards the waterfront and also t
microbrewery. Porthcawl Civic Trust	has also undertaken feasibility work to explore proposals to deliver a bus terr
Society reject the Draft Replacement LDP in	regeneration area. The bus terminus project is being brought forward in connection
relation to the development of Porthcawl as	Metro Plus project and is seen as a key element of the wider regeneration plans.
the outcome will not deliver the overarching	

n and commercial. In terms of important for health and wellinimum. Policy PLA1 requires eation Facilities in accordance ment Supplementary Planning created within the Sandy Bay ting and extending the existing vities, potentially including the area, is key to the development e's south-eastern edge. A large he Relic Dunes and provide a n Sandy Bay, smaller "pocket" ed within these areas of open planning application stage. The al route along Sandy Bay that

community facilities whilst also v stone and glass-clad building puncil also wants to create new ffice for the harbour master as as are in place that will further and a canopy structure capable

oolicies will promote tourism rotection of well-located, good ne County including Porthcawl, tion Management Plan (2018-

y will be critical to the success storey car park on the existing blic realm and development. tion is that travel to Porthcawl s, greatly reducing the number ad support for the concept of a operties on Hillsboro Place.

shift towards increased use of vell as being part of the wider Portway of which will function eneration site and town centre. o the town centre. The Council erminus within the Porthcawl on with Cardiff Capital Region

	aspiration to create a premier seaside resort of regional significance.		Furthermore, the Council have prepared a Sustainability Appraisal (SA) to inform the Appendix 9) of which was carried out to identify the likely significant environment effects from the Deposit Plan. It also considers whether any mitigation and enhance incorporated within the Replacement LDP to ensure the avoidance of likely significant enhance the effectiveness of the plan. The findings of the SA indicate that development development the transmission of the SA indicate that development the transmission of the section of the transmission of transmissio
			with its proposed range of land uses will likely produce a wide range of significant b In terms of employment, the imbalance and shortage of employment land in F compared with other settlements within the County Borough, although it is likely that in the town will continue to be provided through planned growth in the commercial, I
			In relation to the removal of the green wedge policy, a report (See Appendix 34) has reviews the existing green wedge designations in the adopted Bridgend Local Develor considers the need for their continuation in the emerging Replacement Bridgend Local 2033. It concludes that whilst existing LDP Policy ENV2: Development in Green We used for its primary objective of preventing coalescence, other policies contain particularly Policy ENV1: Development in the Countryside, has also been successful Furthermore, the Replacement LDP features defined settlement boundaries and pol development in the countryside, open space, biodiversity, landscape and the enviro sufficient land for housing. As such, it is therefore considered that the green wedge forward in the Replacement LDP, as it will not be necessary.
			Furthermore, a review of the existing settlement boundaries has taken place (See Boundary Review). Porthcawl is defined as an area of growth – but which can pred the existing settlement boundary. A more flexible approach to defining the settle settlement would mean the inclusion of greenfield sites that could be 'cherry- undermine the delivery of the brownfield regeneration site that is crucial for the succ changes have been made to the settlement boundary of Porthcawl.
			In terms of the Maritime Centre, all references have been removed with the Depos documents.
			Further consultation will take place on the Placemaking Strategy being prepared allow for further public engagement and representations to be made in relation to th regeneration site. Further information relating to the consultation will be made availa once details have been finalised.
145	<u>SP2 (1) Porthcawl Waterfront – 1,020</u> units Water supply	No changes proposed.	Comments noted. SP10 references that all development proposals must be suppo new infrastructure, specifically referencing utilities. The Council has and will contin Cymru Welsh Water as the Replacement LDP progresses and at planning application
	Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers' supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.		

n the Replacement LDP (See ental and wider sustainability ncement measures should be ificant adverse effects and to oment of Porthcawl Waterfront beneficial effects.

Porthcawl is acknowledged at the majority of employment I, leisure and tourism sectors.

has been undertaken of which elopment Plan 2006-2021 and ocal Development Plan 2018-Vedges has been successfully ained within the extant LDP, ful in preventing coalescence. Policies of which strictly control fronment whilst also allocating dge policy need not be taken

See Appendix 38 - Settlement redominately be served within lement boundary around this y-picked' by developers and ccess of the plan. As such, no

osit Plan and other supporting

d for Porthcawl, of which will the proposals intended for the lable on the Council's website

ported by sufficient existing or tinue to work closely with Dŵr ation stage.

Sewerage network

Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required. There are numerous public sewers crossing this site for which protection measures will be required in the form of easement widths or diversions.

Wastewater Treatment Works (WwTW)

There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development.

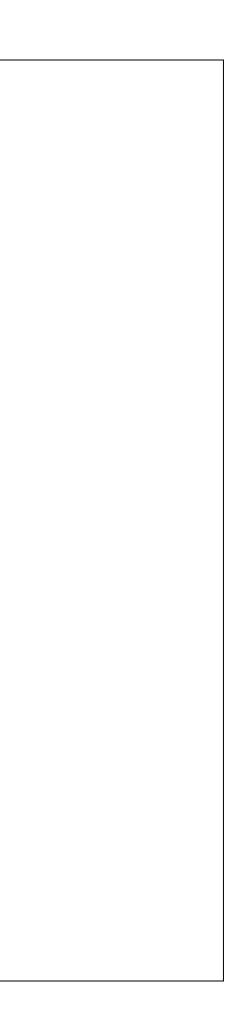
SP2 (5) Land east of Pyle – 1,057 units

Water supply

Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers' supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required. There is a 200mm distribution main and a 250mm trunk main traversing the site for which protection measures will be required in the form of easement widths or diversions.

Sewerage network

Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required. There are three sewers and a rising main traversing



the site for which protection measures will be required in the form of easement widths or diversions – these are a 100mm combined rising main, a 150mm combined sewer, a 300mm combined sewer and a 525mm combined sewer.		
Wastewater Treatment Works (WwTW)		
There should be no issue with Afan WwTW accommodating the foul-only flows from this development.		

Title:	Title: Do you have any comments to make on the key proposals? Ogmore and Garw valleys				
ID	Comment	Summary of changes being sought/proposed	Council response		

Titler	Title: Do you have any comments to make on the key proposals? Bridgend and Pencoed			
ID	Comment	Summary of changes being	Council response	
		sought/proposed		
137 0	I hereby object to the development at Laleston for the construction of 850 homes, etc. I do not believe that we require any more houses to be constructed. With a UK wide dropping population, the requirement for more homes is not necessary. In regards to the environmental and climatic impact that this development will have, will be catastrophic.	Objection to Strategic Allocation PLA3: Land West of Bridgend	Comments noted. The Deposit Plan has been prepared in accordance with Welsh Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and r underpinned by robust evidence to ensure that plans are effective and deliverable and as defined in national policy set out in Planning Policy Wales (PPW). The Deposit Plan has been underpinned by the identification of the most appropriate and housing provision, all of which have been based upon well informed, evidence b need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferrer Options). A range of growth scenarios across the whole Replacement LDP period discussed within the Strategic Growth Options Background Paper. This has co Borough's demographic situation is likely to change from 2018-2033 and inform response for the Replacement LDP. As such the Replacement LDP identifies an apt to enable a balanced level of housing and employment provision that will achieve sus support existing settlements and maximise viable affordable housing delivery. The distribution of growth is further evaluated and justified in the Spatial Strategy of (See Appendix 43 – Background Paper 3). The strategy prioritises the development proving delivery. The distribution of growth is further evaluated and justified in the Spatial Strategy of (See Appendix 43 – Background Paper 3). The strategy prioritises the development periphery of sustainable urban areas, primarily on previously developed brownfield on the delivery of the brownfield regeneration allocations identified in the existin Maesteg and the Llynfi Valley are still denoted as regeneration priorities throw Regeneration Growth Areas. The ongoing commitment to brownfield development settlements accords with the site-search sequence outlined in Planning Policy Was developmental pressure on Best and Most Versatile (BMV) agricultural land. However success in delivering development on brownfield regeneration opportunities remain	

sh Government Development d revise a development plan, and contribute to placemaking,

ate scale of economic growth based judgements regarding red Strategy Strategic Growth iod have been analysed and considered how the County ormed the most appropriate appropriate plan requirement ustainable patterns of growth,

y Options Background Paper ment of land within or on the eld sites. It continues to focus sting LDP, hence, Porthcawl, hrough their designation as ent opportunities within these Vales and seeks to minimise ever, given the existing LDP's bly Bridgend and the Valleys aining. Additional viable and

deliverable sites (including some greenfield sites) are therefore required to implem housing in high need areas and ensure the County Borough's future housing require
The Replacement LDP apportions sustainable growth towards settlements that alrest services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See Approximately sustainable settlement hierarchy. Based upon the consideration of a comprehest sustainable growth will be appropriately directed towards the Main Settlements of Browth the grouped Main Settlement of Pyle, kenfig Hill and North Cornelly.
The plan preparation has involved the assessment of 171 sites. Each candidate site the criteria in the Candidate Site Assessment Methodology which was previously con 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assess based on any specific issues they raised in terms of their deliverability, general location existing use(s), accessibility, physical character, environmental constraints and op were asked to prepare and submit a number of technical supporting studies deliverability, sustainability and suitability. Proceeding this detailed assessment, appropriate were included for allocation in the Deposit Plan. As such, candidate site was considered appropriate for allocation.
As part of the proposed allocation of Land West of Bridgend, development will requirements including masterplan development principles and placemaking principles and placemaking principles and placemaking allongside a new one and a half form entry Primary School, recreation facilities appropriate community facilities all set within distinct character areas.
Policy PLA3 will ensure development positively integrate the remains of Llangewyd Scheduled Ancient Monument in a manner that preserves and enhances the remain Development must also incorporate the Laleston Trail within the central part of the s Bridgend Circular Walk and realigned Public Right of Way. Furthermore, the enclose hedgerow corridor will be retained as the Y Berth cross link. In terms of active trave site and off-site measures to provide good quality, attractive, legible, safe and acce linkages in accordance with Active Travel design. Improved linkages must be prov Bryntirion Comprehensive School and Bridgend Town Centre (including the bus star routes should be provided to accord with the proposed routes within the Counce Maps:INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58, BRC9b.
In terms of biodiversity/ecology, an ecological desk study and Extended Phase 1 su by EDP. The desk study has noted that within the Study Site's zone of influence there and non-statutory designated sites present, most notably Laleston Meadows SII site itself.
Given the combination of designated sites, it is concluded that any future plat to consider the potential for direct and indirect impacts to arise upon qualifying feature Meadows SINC. However, it is inherent within the emerging masterplan that the Lale its associated designated features will be retained. Furthermore, such retained feature from potential harm, damage and disturbance through the sensitive design of built de boundaries and inclusion of suitable buffers.

ment SP1, deliver affordable rements can be realised.

ready benefit from significant enabling transit orientated Appendix 19) to establish a chensive range of variables Bridgend and Pencoed along

e has been assessed against onsulted upon (See Appendix ssment, sites were examined ation, neighbouring land uses, opportunities. Site promoters s to demonstrate the site's at, only those sites deemed te 308.C1 Bridgend (West of)

ill be subject to site-specific inciples (See Deposit Policy le units, will be incorporated es, public open space, plus

ydd Church and Churchyard ins as part of the wider site. e site, providing access to the osed byway with the existing vel, Policy PLA3 requires oncessible pedestrian and cycle rovided along the A473, with tation and train station). New ncil's Active Travel Network

survey has been undertaken ere are a number of statutorily SINC which overlaps with the

alanning submission will need atures, including the Laleston aleston Meadows SINC and atures will be further protected development away from SINC

	The desk study confirms that the inclusion of Laleston Meadows SINC within the provide substantial potential for a balanced provision of areas of informal public oper When linked with proposed POS and play areas across the developable site this benefit to both visual and recreational amenity, conservation and biodiversity enhalter, the SINC provides a potential space to accommodate ecological mitigation and and thus offset ecological impacts that may arise during the development of adjacent
	An Extended Phase 1 survey was undertaken in February 2020, supplemented by further March 2020. The Phase 1 survey concluded that the site is dominated by agricultural limited botanical interest and thus of low inherent ecological value. Habitats of great include the native hedgerows delineating the northern boundary and internal field woodland habitat and marshy grassland associated with Laleston Meadows SINC identified several trees with low to high potential to support a bat roost whilst onsite potential to support great crested newt.
	The results of the desk study and Extended Phase 1 survey have influenced the mas to locate development across those habitats of predominantly limited ecolo boundary habitats as far as possible. Where retained, such features have been acco informal green space and sustainable transport links, which ultimately enhances conr and contributes to the wider green infrastructure resource.
	Where avoidance is not possible, however, and will result in the loss of inter predominantly species-poor or defunct), the site is considered to be of sufficient size development proposals to flexibly avoid and/or mitigate for any significant ecological of where necessary. This will be in addition to the sensitive positioning of built retained boundary features to minimise damage.
	The report also highlights further detailed habitat and species surveys which inform a planning application and ensure proposed mitigation is appropriation include a Dormouse survey, which was raised in comments received from NRW. development to retain and provide suitable buffers to habitats, particularly hedgerow and/or Semi-Ancient Woodland) and Laleston Meadows SINC, which includes the northern and north-western boundaries of the site. PLA3 will also require the agree ecological management plans including proposals for mitigation, enhanced retained habitats and protected species (including for bats and dormouse) compensatory and replacement habitat.
	Policy PLA3 will require development to incorporate the Laleston Trail within the centra access to the Bridgend Circular Walk and realigned Public Right of Way. Addit hectares of retained green infrastructure and new areas of public open space a seven key areas of formal open space (including 0.5ha of equipped play prand linkages, green streets, and explore the provision of enabling sensitive public Meadows SINC and woodland.
	The proposed allocation is supported by detailed masterplanning work, including a identify a realistic dwelling yield on the site's net developable area. The Transponumber of dwellings the site is expected to deliver. This identifies the various transport development, and, in combination with the Strategic Transport Assessment taken to deal with the anticipated transport impacts of the scheme. Proposed P appropriate development requirements in relation to all forms of travel. For the average of the scheme of the sc

e Study's Site boundary will ben space and wildlife zones. his will provide a significant hancement. In respect of the nd biodiversity enhancements ent land.

v further roosting bat works in urally improved grassland of reatest ecological importance d boundaries in addition to IC.The roosting bats surveys ponds have been considered

nasterplan which has sought logical value whilst retaining commodated within proposed nnectivity throughout the Site

ernal field boundaries (albeit e and extent to enable future l constraints and compensate lt development away from

which are recommended to riate and proportional. These V. Policy PLA3 will require the bws, trees (including Ancient the green space bordering the developer to submit and cement and maintenance for and provide appropriate

ntral part of the site, providing ditionally, PLA3 requires 4.1 e across the site comprising provision), informal spaces lic access to part of Laleston

g an illustrative block plan to bort Assessment reflects the ansport issues relating to the ment, what measures will be Policy PLA3 prescribes the avoidance of any doubt, this

number of dwellings does not require the original proposed site boundary to be expanse use of the existing net developable area. The density and mix of uses proposed is support a diverse community and vibrant public realm, whilst generating a critical services such as public transport, local shops and schools. In accordance with nation densities should be encouraged in urban centres and near major public transport not the site's location within the Primary Key Settlement of the County Borough and the Centre, this density level is therefore considered appropriate to foster sustainable cor by the proposed enhancements to the active travel network.
The Replacement LDP aims to reduce private car reliance and help the County Born set out by the Active Travel (Wales) Act 2013, with the ultimate aim of improving and active travel routes as identified in the Existing Route Maps. Consideration of active the master planning of strategic sites in the County Borough. Reference to the Active PLA3 in conjunction with Policy PLA12 should be considered essential in the delivery proposal, ensuring that development is contributing to the promotion of a sustainable
The Active Travel Network Maps aim to improve access to key services and facilit employment sites, retail areas and transport hubs, improved access to education fa colleges and improvements to, and expansion of, the existing strategic cycle netwo Opportunities will be maximised to further improve upon these routes, providing wal allow integration between new developments and existing communities.
Whilst developments should be encouraged in locations which reduce the need to tra- sustainable transport, the Council recognises that any development growth will lik demand, and that increased traffic levels and congestion is likely to occur if appr measures and infrastructure are not delivered. Therefore a Strategic Transport Asse has been undertaken to consider the impact of plan proposals and help guide delivering land allocations by means of modelling and quantifying the transport impa- technical notes accompanying this assessment demonstrate that the proposed lev within the LDP can be accommodated within the BCBC Highway Network with suital
Furthermore Strategic Policy 5: Sustainable Transport and Accessibility will ensure located and designed in a way that minimises the need to travel, reduces dependent enables sustainable access to employment, education, local services and community be required to deliver, or contribute towards the provision of, active travel scheme, road infrastructure, and other transport measures, in accordance with the Bridgend the Bridgend Integrated Network Plan (See Appendix 29).
Proposed Policy PLA3 prescribes a number of placemaking principles for Land W considered instrumental to achieving sustainable places, delivering socially in promoting cohesive communities. Such requirements include pursuing transit-or prioritises walking, cycling and public transport use, whilst reducing private motor designed, safe walking and cycling routes must be incorporated throughout the orientated, healthy walkable neighbourhoods. There will be a clear emphasis on procycling linkages along the A473, with Bryntirion Comprehensive School and Bridge the bus station and train station). New routes should be provided to accord with the Council's Active Travel Network Maps: INM-BR-52, INM-BR-55, INM-BR-57, INM-BR also require development to provide a new shared cycle / footway on the northern s the site with active travel route INM-BR-57 linking to the shops at Bryntirion to the east to the west of the site to provide a connection to the eastbound bus stop on the A477.

panded, rather more efficient is considered appropriate to al mass of people to support tional planning policy, higher nodes or interchanges. Given e proximity to Bridgend Town ommunities, further bolstered

brough achieve the principles d expanding upon the current ve travel has been key during tive Routes detailed in Policy ery of any strategic site or any ble and healthy lifestyle.

ilities including town centres, facilities such as schools and work in the County Borough. alking connections which will

travel and promote the use of likely result in greater travel propriate mitigating transport sessment (See Appendix 36) e and inform the process of pact of these proposals. The evel of development detailed table mitigation.

re that development must be dency on the private car and ity facilities. Development will e, public transport measures, nd Local Transport Plan and

West of Bridgend, which are nclusive developments and orientated development that or vehicle dependency. Wellhe site to foster community providing safe pedestrian and gend Town Centre (including he proposed routes within the 3R-58 and BRC9b. PLA3 will side of the A473, connecting east, and a widened footway 473.

			Policy PLA3 will require on-site highway improvements to ensure the principal p achieved from a new signalised junction with the A473 at the southern boundary; the a new-shared use crossing to connect the internal cycleway/footway with the existing southern side of the A473. Additionally, a future planning application must be accompanied by an 'Energy Mat that the most sustainable heating and cooling systems have been selected. This sho the proposed system as a whole, including the impact of its component materials on The Renewable Energy Assessment identifies this site as suitable for installing a ne this development requirement is proven to be financially or technically unviable the must follow the sequential approach to identify low carbon heating technologies in a Furthermore, the Council have prepared a Sustainability Appraisal (SA) to inform t Appendix 9) of which was carried out to identify the likely significant environment effects from the Deposit Plan. It also considers whether any mitigation and enhance incorporated within the Replacement LDP to ensure the avoidance of likely signific enhance the effectiveness of the plan. The findings of the SA indicate that the prop proposed range of land uses will likely produce a wide range of significant beneficial
145	SP2 (2) Land south of Bridgend (Island Farm) – 847 units	No changes proposed.	Comments noted. SP10 references that all development proposals must be suppor new infrastructure, specifically referencing utilities. The Council has and will continu
	Water supply	P. op o o o o o o	Cymru Welsh Water as the Replacement LDP progresses and at planning application
	Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers' supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.		
	Sewerage network		
	Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.		
	The site is traversed by a 225mm foul public sewer for which protection measures will be required in the form of an easement width or diversion.		
	Wastewater Treatment Works (WwTW)		

point of vehicular access is he junction will accommodate ng active route BRC9b on the

Asterplan' that demonstrates hould include consideration of on greenhouse gas emissions. new District Heat Network. If then development proposals accordance with ENT10.

the Replacement LDP (See ental and wider sustainability neement measures should be ficant adverse effects and to roposed development with its ial effects.

oorted by sufficient existing or inue to work closely with Dŵr ition stage. There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development.

SP2 (3) Land west of Bridgend – 810 units

Water supply

Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers' supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.

Sewerage network

Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.

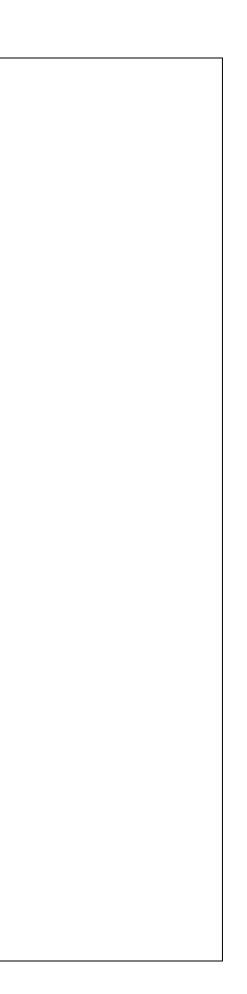
Wastewater Treatment Works (WwTW)

There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development.

SP2 (4) Land east of Pencoed – 770 units

Water supply

Owing to the number of units proposed on this site, it is unlikely that the water supply network has sufficient capacity to serve the site without causing detriment to existing customers' supply. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.



	There is a 200mm distribution main and a 250mm trunk main traversing the site for which protection measures will be required in the form of easement widths or diversions.		
	Sewerage network		
	Owing to the number of units proposed on this site, it is unlikely that there is sufficient capacity available within the public sewerage network to accommodate the foul-only flows from this site. As such, a hydraulic modelling assessment will likely be required to determine the level of reinforcement works required.		
	There are three sewers and a rising main traversing the site for which protection measures will be required in the form of easement widths or diversions – these are a 100mm combined rising main, a 150mm combined sewer, a 300mm combined sewer and a 525mm combined sewer.		
	Wastewater Treatment Works (WwTW)		
	There should be no issue with Penybont (Merthyr Mawr) WwTW accommodating the foul-only flows from this development.		
434	Land east of Pencoed has been identified as a location for 770 residential units including affordable housing; a new primary school and nursery facility; outdoor recreational facilities as well as active travel routes and community facilities. Having spoken to a number of residents, concerns have been raised relating to the current capacity of local services such as the GP surgeries and dental services. It will be important that relevant stakeholders such as Pencoed Town Council and the county borough hold a review of current services and infrastructure and identify where there needs to be improvement in order to	Comments regarding Strategic Allocation PLA4: Land East of Pencoed, amenities and facilities within Pencoed, health care facilities, primary school, Moratorium	Comments noted. The Deposit Plan has been underpinned by the identification of t economic growth and housing provision, all of which have been based upon we judgements regarding need, demand and supply factors (See Appendix 42 – Bac Strategy Strategic Growth Options). A range of growth scenarios across the who have been analysed and discussed within the Strategic Growth Options Background how the County Borough's demographic situation is likely to change from 2018-2 appropriate response for the Replacement LDP. As such the Replacement LDP is requirement to enable a balanced level of housing and employment provision t patterns of growth, support existing settlements and maximise viable affordable ho The distribution of growth is further evaluated and justified in the Spatial Strategy (See Appendix 43 – Background Paper 3). The strategy prioritises the developm periphery of sustainable urban areas, primarily on previously developed brownfiel on the delivery of the brownfield regeneration allocations identified in the exist Maesteg and the Llynfi Valley are still denoted as regeneration priorities th
	facilitate the increase in population as a result of the additional residential properties. As the replacement LDP highlights, the land east of Pencoed has been identified as a potential location for a		Regeneration Growth Areas. The ongoing commitment to brownfield development settlements accords with the site-search sequence outlined in Planning Policy W developmental pressure on Best and Most Versatile (BMV) agricultural land. Howe success in delivering development on brownfield land in other settlements (notab Gateway), there are limited further brownfield regeneration opportunities rema

of the most appropriate scale of well informed, evidence based Background Paper 2: Preferred whole Replacement LDP period and Paper. This has considered 8-2033 and informed the most P identifies an appropriate plan in that will achieve sustainable housing delivery.

egy Options Background Paper pment of land within or on the field sites. It continues to focus sisting LDP, hence, Porthcawl, through their designation as nent opportunities within these Wales and seeks to minimise wever, given the existing LDP's tably Bridgend and the Valleys maining. Additional viable and

primary school. It is incredibly disappointing	deliverable sites (including some greenfield sites) are therefore required to implement
that the council has not indicated as to	housing in high need areas and ensure the County Borough's future housing requirer
whether or not this will be an English	
medium or Welsh medium school.	The Replacement LDP apportions sustainable growth towards settlements that alrea
Depending on the decision, it could have a	services, facilities and employment opportunities and are most conducive to e
further impact on traffic in the town given	development. As such, a Settlement Assessment has been undertaken (See Ap
that if the primary school is English medium,	sustainable settlement hierarchy. Based upon the consideration of a comprehe
it would likely feed into Pencoed comp.	sustainable growth will be appropriately directed towards the Main Settlements of Bri
Further, I have been vocal over the past 2 –	with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
3 years about the lack of Welsh medium	
education provision in the county borough,	The plan preparation has involved the assessment of 171 sites. Each candidate site h
especially in the Pencoed area. I would	the criteria in the Candidate Site Assessment Methodology which was previously cons
press on the council to ensure that the	13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assess
potential primary school is a Welsh medium	based on any specific issues they raised in terms of their deliverability, general locatio
school as there are already 2 English	existing use(s), accessibility, physical character, environmental constraints and opp
medium primary schools in Pencoed and	were asked to prepare and submit a number of technical supporting studies t
the lack of provision of Welsh medium	deliverability, sustainability and suitability. Proceeding this detailed assessment,
education in the wider county is shameful.	appropriate were included for allocation in the Deposit Plan. As such, candidate site 2
We only need to look at recent cases in	appropriate for allocation.
Pencoed to see that the current system is	
failing parents. These parents are now	As part of the proposed allocation of Land East of Pencoed, development will be
facing the decision of sending their children	requirements including masterplan development principles and placemaking princ
even further away to receive their education	PLA4 – Page 75). The provision of new residential units, including affordable dwel
in Welsh, or to opt for English medium	alongside a new 1.5 form entry primary school, recreation facilities, public oper
education. There's a fundamental question	community facilities and commercial uses.
of fairness here? Why should children in	
Pencoed need to travel to receive their	In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been p
education in Welsh? A town the size of	a single schedule of all necessary infrastructure without which the development
Pencoed should have a Welsh medium	anticipated quantum of proposed housing/employment uses within the plan period
primary school. Moving on, it is welcome	infrastructure includes transport, education, health, environmental management,
that the draft LDP suggests that the	community and cultural infrastructure.
moratorium on developments west of the	
railway will remain in place. I want to	In terms of health, the Council has also been engaging with Cwm Taf Morgannwg Un
emphasis the point that residets feel that	the outset of the Replacement LDP process. Early meetings were held to ensure the le
this moratorium should remain for the	of growth proposed was clarified to help facilitate alignment of service provision.
duration of this plan period, even if the	Candidate Site Assessment, the health board amongst other consultation bodies
Penprysg road bridge is replaced during the	comments in respect of those sites identified as suitable for future development and
plan period. However, it's important that the	Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthca
current bottleneck on Hendre road is	relationships will continue and be maintained with Cwm Taf Morgannwg University
resolved before we see the Penprysg bridge	key to service provision planning as site allocations with the Deposit Plan progress.
replaced. A significant amount of residents	
have expressed their desire for the road to	In relation to education, should PLA4: Land East of Pencoed development be ado
be widened, especially the section of the	Development Plan, a decision on language type for the primary provision (ie wheth
road between Heol Wastadwaun and Min-y-	English-medium) would be undertaken in due course.
nant. I would welcome further consideration	
to what happens to the town centre once the	In terms of the moratorium, Background Paper 16: Development West of the Railway
crossing is closed. There is scope for	of several recent studies focussed on the highway network in Pencoed to determin
regeneration around the cenotaph which I'm	existing moratorium on development, as prescribed by Policy PLA6 in the Bridgend L
sure would be welcomed by residents.	be retained in the emerging replacement Local Development Plan 2018 to 2033.
would like to welcome the provision of	significant assessment has been undertaken into developing a solution which

ment SP1, deliver affordable rements can be realised.

ready benefit from significant enabling transit orientated Appendix 19) to establish a chensive range of variables Bridgend and Pencoed along

e has been assessed against onsulted upon (See Appendix sment, sites were examined tion, neighbouring land uses, opportunities. Site promoters s to demonstrate the site's it, only those sites deemed as 219.C1 was considered as

Il be subject to site-specific nciples (See Deposit Policy vellings, will be Incorporated ben space, plus appropriate

produced. The IDP provides nt of allocated sites for the od could not proceed. Such ent, utilities in additional to

University Health Board from e level and spatial distribution h. As part of Stage 3 of the lies were invited to provide and possible allocation in the hcare services, close working ty Health Board. This will be

dopted within the new Local ether the school is Welsh or

ay Line, Pencoed, makes use mine the requirement for the d Local Development Plan, to 3. It has been identified that h is likely to require major

greenspaces in the area. However I would be interested to know as to whether consideration has been given to use the land known locally as the 'old brickyard' for green space development? I note the planned expansion of the Park and Ride facilities, however there will be land left over on the 'Old brickyard' that could be turned into a small park for the benefit of the community.	interventions to include the closure of the Hendre Road level crossing as well as a re- bridge with significantly improved capacity and active travel infrastructure. However subject to many constraints which would need to be overcome through further asse require collaboration of several statutory undertakers. There are also restrictions in existing guarantees that the required costs for major intervention can be met over the It is therefore concluded that the existing development moratorium in Pencoed sh revised Local Development Plan 2018-2033 until a suitable transport intervention ma The Council is currently carrying out an initial public consultation on the Pencoed le road bridge, of which will allow members of the public and other stakeholders t
	concerns. Whilst the replacement LDP Policy PLA8 (5) allocates and safeguards land for the ex and ride facility at Pencoed, no definitive plans have been worked up as of development will provide opportunities for effective interchange between active trave to facilitate a reduction in the length and number of car-borne journeys, especia Providing for convenient and efficient interchange between transport modes is vital for options more attractive and practical to residents.

Title:	Do you have any comments to make on the D	Deposit Replacement	LDP?
ID	Comment	Summary of changes being sought/proposed	Council response
137 0	In regards to the extensive archaeological landscape that will be affected by such a development, can only be described as significant.	Concerns regarding affects of development on archaeological landscape.	The Replacement LDP is accompanied by a SA Report (incorporating SEA) to ass and significant environmental effects of all substantive component within the P allocations, etc.) and any identified reasonable alternatives. This builds directly u including an SA Scoping Report (2018) and an Interim SA Scoping Report (201 Replacement LDP Preferred Strategy. The Deposit Plan SA Report demonstrates SEA, process has informed the development of the Deposit Plan, including the inco- changes within the document. As a result, the SA Report concludes that there is sustainability issues in Deposit Plan, with plan components performing well against identifies strong compatibility between the LDP Vision/Objectives and the SA significant adverse effects (taking account of mitigation in all its forms). In accordance with statutory requirements, Planning Policy Wales sets out development to avoid direct adverse effects on nationally important heritage asset development resulting in adverse effects on the historic environment to be robust general presumption in favour of the preservation or enhancement of listed buildin with a requirement for development not to result in direct adverse effects on Schedule are exceptional circumstances. These issues are grouped under 'Cultural Heritag Sustainability Objectives considered by the SA. The potential for adverse impacts or is an important consideration in determining the overall sustainability and thus a allocations. Any sustainability impacts would also depend on the scale of development All Stage 2 Candidate Site Sites were considered to ascertain whether they had the pri impact upon the historic environment. To facilitate this assessment, the Council con Gwent Archaeological Trust (GGAT) early on in the process for their views on the lik historic environment along with recommendations for mitigation. Any identified im mitigated by site promoters.

replacement Penprsyg Road er, the available solutions are sessment and design and will in terms of funding, with no the replacement plan period. should be retained within the materialises.

level crossing and Penpyrsg to voice their views and/or

expansion of the existing park f yet. However, such future vel, public transport and cars ially for the journey to work. for making sustainable travel

Assess the likely sustainability Plan (strategy, policies, site y upon previous SA reporting 019) which accompanied the es how the SA, incorporating accorporation of recommended e is good coverage of all key hast the SA Framework. It also A Framework, plus no likely

ut multiple requirements for sets and for the need for any ustly justified. There is also a lings and their settings, along uled Monuments, unless there tage', which is one of the 14 on Cultural Heritage was and s suitability of candidate site ment proposed.

potential to cause an adverse onsulted with the Glamorganlikely range of impacts on the impacts were required to be For Land West of Bridgend (PLA3) the SA identified the potential for adverse impacts due to the proximity of the site to scheduled monuments and important archaeological sites. However, the requirements under SP2 (for each strategic site allocation to be supported by a detailed masterplan) and PLA3 (for the proposed strategic site allocation to implement specific masterplan development principles) represent forms of mitigation to help address the identified likely significant effects. These requirements also enhance the sustainability performance of the strategic site allocation more generally. The SA identifies relevant masterplan development principles included in these spatial development policies to help ensure the avoidance of likely significant adverse effects which could otherwise occur from this development proposal. Additional masterplan development principles are also included within Policy PLA3 to ensure site applies Good Design principles and a Sustainable Placemaking approach to siting, design, construction and operation in accordance with Planning Policy Wales. These principles were informed by SA findings and have been incorporated into the final Deposit Plan, with SA site assessment scoring updated to reflect their inclusion in the Deposit Plan.

Further to this, the site promoter commissioned EDP to undertake an Archaeological and Heritage Assessment. The assessment establishes that the site does not contain any World Heritage Sites, Scheduled Ancient Monuments, listed buildings, registered historic parks and gardens or historic landscapes, where there would be a presumption in favour of their physical preservation in-situ and against development. In terms of archaeological remains, the site is identified as having moderate to high potential to contain remains from the medieval period, particularly in its northern extremity, which is adjacent to the site of the former Llangewydd Church. However, the land is a SINC and will not be developed. Policy PLA3 will require development to positively integrate with the remains of Llangewydd Church and Churchyard Scheduled Ancient Monument in a manner that preserves and enhances the remains as part of the wider site.

While there is a small amount of evidence for late prehistoric and Roman activity in the surrounding 1km study area, the potential for archaeology of these periods within the site is deemed low. Post-medieval settlement was focused elsewhere in the locality and any archaeology of this period within the site is most likely to relate to agriculture. Overall, the baseline data indicate that the probability of significant archaeology being present is low. Any further archaeological investigation can reasonably be secured through an appropriately worded planning condition appended to a planning permission.

Potential impacts upon the setting of historic assets in the locality have focused on the 1km study area. No significant effects arising from changes to setting have been identified for scheduled monuments, listed buildings and registered parks and gardens. In respect of the Laleston Conservation Area, there will also not be any significant changes to its visual setting. It is acknowledged that development in the southern part of the Site will remove a part of the agricultural landscape around Laleston which forms a buffer from Bryntirion to the east. However, agricultural landscaping measures associated with the development will mitigate any impression of coalescence. This is assessed as an impact of a minor order, with the special interest of the conservation area being retained. Policy PLA3 will require development to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.

The site promoter also commissioned EDP to undertake a Landscape and Visual Appraisal (LVA). The purpose of the appraisal was firstly to inform the design evolution of the scheme which enabled an integrated approach to potential landscape and visual opportunities and constraints.

The LVA outlines that there are adverse and beneficial landscape effects resulting from development of this site. However, the embedded mitigation and the approach to design is considered to minimise adverse effects over

time as the proposed landscape establishes and overall the predicted effects are not
from a landscape and visual perspective in the context of the delivery of a strategic
The appraisal included a review of national and local policy, landscape character appraisal included assessment of the National Landscape Character Assessment Landscape Character Assessment for Bridgend County Borough (LCABC) (2013) assessment. The appraisal confirms that the site relates well both in landscape and landscape and settlement, and that the site represents a logical extension to Brynt design is sensitive to the site's existing characteristics. The design appraised responsite such as the Bridgend Circular Walk, the byway, the hedgerow network and versuch the proposals put forward at this stage are considered to be a thoughtful and development of this site.
Mitigation measures include:
 The Laleston Meadows SINC would be brought into regular long-term managen visual amenity and landscape character of this northern part of the site. A I development back from the SINC, and dwellings would front onto it. The SINC car receptor site (in ecological terms) and the grazed fields currently within the SINC proposals as well as maintained in the long term. The SINC offers a great opportuplay on site provided increased public access would not clash with its ecological The site contains very few of the key characteristics listed in the published docur site has a strong network of hedgerows, some which would be lost and the field form. However, the retained hedgerows and trees would be protected by landsca character of the SLA within which the site lies would be retained; Provision of structural landscaping, a mix of native and non-native trees and shrut site for biosecurity, diversity of ecosystems and habitat creation as well as the residents. Ares of open space would be bolstered by considered structural plantin pleasing urban development which is well integrated with the proposed landscar landscape character currently experienced in the local area; Retention of existing landscape features (hedgerows and trees) is a priority of th forms a desirable strong green framework that links with the wider green infrastrus south of the site; Adequate replacement planting of local species in appropriate locations to comp and hedgerows, and enhancement planting; and The location of public open space, public footpaths and the street-alignment ha and reflect local character.
Through consideration of the findings above, it is anticipated that any notable la resulting from the addition of the proposed scheme would be localised in extent and radius of the site, despite the site's relatively open character.
Overall is it considered that the masterplan framework proposed for the site has through a landscape and ecology-led approach, with appropriate incorporation of n to address concerns of the site in relation to landscape and visual matters. As suc for residential development should be considered an acceptable extension to the exis which would not cause significant or wide-ranging adverse effects upon its surround
Policy PLA3 will ensure that the design and layout of the site has regard to the considering the interface between the site, Bridgend and Laleston. Visual impacts

not considered unacceptable c housing site.

cter and visual amenity. The ent (NLCA), LANDMAP, and 13) in addition to an on-site ind visual terms to the existing intirion provided a considered bonds sensitively to assets on egetated site boundaries. As and easily assimilated future

ement. This would protect the landscape buffer would set could be used as a mitigation NC could be improved by the tunity for informal and natural al function;

uments on Laleston SLA. The eld pattern replaced by urban cape buffers and some of the

rubs proposed throughout the the visual amenity of future ting to create an aesthetically cape strategy and the settled

the emerging proposals as it ructure to the north, west and

pensate for any loss of trees

has been designed to protect

andscape and visual effects nd contained within a c.400m

as been sensitively designed mitigation measures in order uch, the promotion of this site disting settlement of Bryntirion nding landscape context.

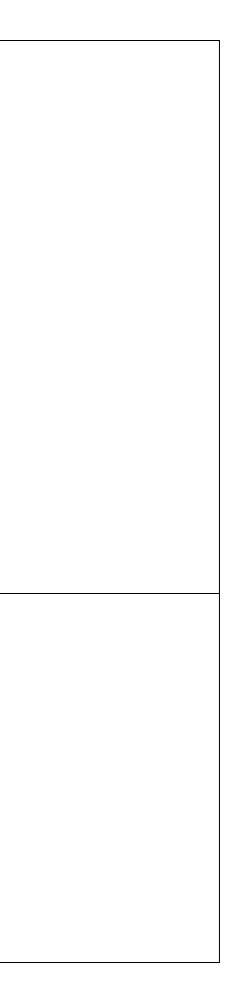
e landscape in which it sits, s must be minimised through

			the inclusion of mitigation measures and provide links with the existing landscape safeguard landscape character whilst creating a sense of place. The development detriment of the Special Landscape Area and any development proposal must incorr adverse effects and/or visual intrusion on the wider landscape.
141	Thank you for consulting us on this document. As we have noted previously in response to consultations, the historic environment forms an important part of Bridgend CBC's area, and includes statutorily designated historic assets of both areas and structures, as well as non- designated historic assets. The range of these includes areas such as the Mesolithic flint scatters at Merthyr Mawr Warren, shrunken Medieval villages, and the historic core of Bridgend, with its Medieval bridge, castle and church, industrial minerals extractive and transporting landscapes, RAF Stormy Down, as well as information on isolated finds of all periods, all of which contribute to the distinctive heritage and current form of the area.	Include the number of non- designated historic assets recorded in the Historic Environment Record, in the supporting text to Policy SP18	Comments are noted. The supporting text to Policy DNP10 at paragraph 5.5.98 of t Appendix 1) advises applicants of the need to consult The Historic Environment Rec Archaeological Trust at an early stage in considering their development proposals considered necessary to further clarify the number of non-designated historic asse Environment Record.
	We are also able to provide information on the policies and procedures that have been adopted for development in other local authorities: for Bridgend, eleven areas have been delineated as Archaeologically Sensitive Areas in an Archaeology and Archaeologically Sensitive Areas SPG which has been supplied to you in draft in 2017 and as far as we are aware, is still awaiting approval.		
	The historic environment should not be seen as any constraint to development, but viewed with the Well-being of Future Generations (Wales) Act, contribute substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining goals.		
	The Deposit plan includes SP18 Conservation of the Historic Environment and as Strategic Objective 4 recognises the range of historic assets, both designated (protected as Scheduled Monuments or Listed Buildings) and non-designated, and the need to both protect and preserve these		

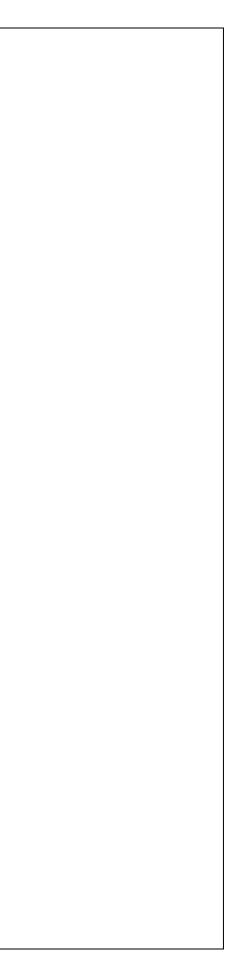
cape and access features to nent must also not be to the orporate measures to reduce

of the Replacement LDP (See Record and Glamorgan Gwent als. For this reason, it is not ssets recorded in the Historic

	as part of Bridgend's heritage. Understanding these as a resource will contribute to a better appreciation, both from a development management viewpoint and also as keyed in with the well-being goals.		
	The Deposit notes the numbers of designated historic assets, and mentions other historic assets, but should also include the number of non-designated historic assets recorded in the Historic Environment Record, which is partly maintained by your Authority, of which there are at least currently 1,800 datapoints, and 2,190 NMR/RCAHMW datapoints.		
	DNP10: Built Historic Environment and Listed Buildings notes that there are historic buildings in the UA area which are not statutorily protected and these are of importance also, retaining historic information. Legislation and Policy relating to the historic environment is noted; and the impact of proposed development, and also the impact of change, on the historic environment is recognised. If you have any questions or require further advice on this matter, please do not hesitate to contact us.		
409	Bridgend Replacement Local Development Plan Thank you for providing us with this opportunity to comment on the Bridgend Replacement Local Development Plan. This email forms the basis of our response to this consultation request. Network Rail is a statutory undertaker responsible for maintaining and operating the country's railway infrastructure and associated estate. Network Rail owns, operates, maintains and develops the main rail network. This includes the railway tracks, stations, signalling systems, bridges, tunnels, level crossings and viaducts. The preparation of development plan policy is important in relation to the protection and enhancement of Network Rail's	proposed	Comments noted
	infrastructure.		



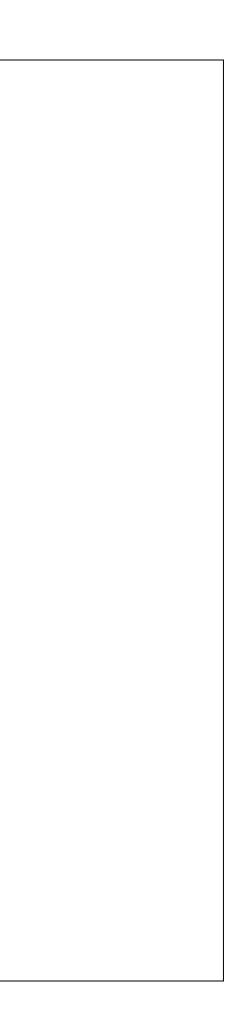
T	· · · · · · · · · · · · · · · · · · ·
Relevant Policies:	
SP5: Sustainable Transport and Accessibility	
PLA7: Development West of the Railway Line, Pencoed	
New development that generates a net increase in vehicular movement will exacerbate congestion either side of the level-crossing and at the complex over- bridge junction between the eastern end of the relief road and Penybont Road.	
PLA8(3) Improvements to the capacity of the Maesteg – Bridgend railway line	
PLA8(5) promotes the expansion of the existing park and ride facilities at Pencoed rail station	
PLA8(6) supports the expansion of the existing park and ride facilities at Pyle rail station.	
SP3: Good Design and Sustainable Place Making	
PLA5 - Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area	
A new pedestrian and cycle bridge over the existing railway line and along A48/Pyle Road	
Pyle Railway Station (approximately 4.5 miles to the north of the site) to be redeveloped as a transport hub. This would entail relocating the existing railway station to Land East of Pyle (PLA5) and incorporating extended park and ride facilities to improve links to Porthcawl as a pivotal terminus.	
Network Rail is a statutory consultee for any planning applications near relevant railway land and for any development likely to result	



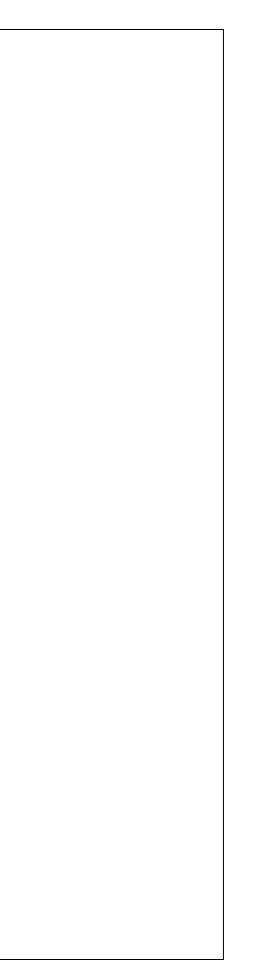
in a material increase in the volume or a material change in the character of traffic using a level crossing over a railway. With this in mind any planned future development (both residential and employment) should take into account any adverse impact on railway. This might be an increase in the use of an existing level crossing. It could be that the predicted growth, may increase future demands at nearby stations which may, in turn, necessitate the need for enhancements to existing facilities such as waiting rooms, toilets and parking. Where there is an adverse impact on the operation of the railway, Network Rail will require appropriate mitigation measures to be delivered as part of the planning application process. As Network Rail is a publicly funded organisation with a regulated remit it would not be reasonable to require Network Rail to fund rail improvements necessitated by commercial development. It is therefore appropriate to require developer contributions to fund such improvements.

Level Crossings

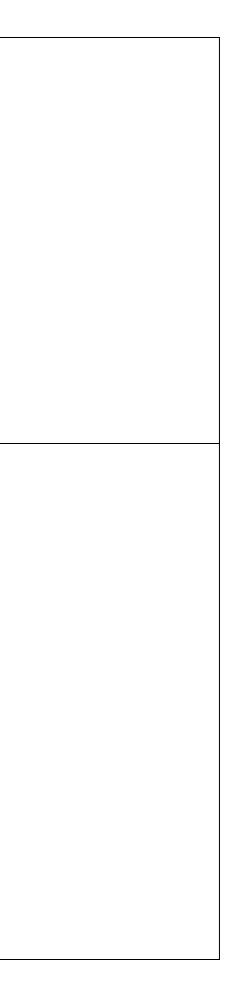
Any development of land which would result in a material increase or significant change in the character of traffic using rail crossings should be refused unless, in consultation with Network Rail, it can either be demonstrated that they safety will not be compromised, or where safety is compromised serious mitigation measures would be incorporated to prevent any increased safety risk as a requirement of any permission. Network Rail has a strong policy to guide and improve its management of level crossings, which aims to: reduce risk at level crossings, reduce the number and types of level crossings, ensure level crossings are fit for purpose, ensure Network Rail works with users/stakeholders and supports enforcement initiatives. Without significant consultation with Network Rail and if proved as required, approved mitigation measures, Network Rail would be extremely concerned if any



future development impacts on the saf	ety		
and operation of any of the level crossir	gs		
listed above. The safety of the operatio	nal		
railway and of those crossing it is of	he		
highest importance to Network Rail.			
Level crossings can be impacted in a vari	ety		
of ways by planning proposals:			
By a proposal being directly next to	a		
level crossing			
By the cumulative effect of development	ent		
added over time			
By the type of crossing involved			
	ge		
	nd		
residential) where road access to a			
from site includes a level crossing			
• By developments that might impe	de		
pedestrians ability to hear approach			
trains			
 By proposals that may interfere w 	vith		
pedestrian and vehicle users' ability			
see level crossing warning signs			
 By any developments for school 	ols.		
colleges or nurseries where minors			
numbers may be using a level crossin			
 By any development or enhancement 	-		
the public rights of way It is Netwo			
Rail's and indeed the Office of F			
Regulation's (ORR) policy to reduce r			
at level crossings not to increase risk			
could be the case with an increase			
usage. The Office of Rail Regulators			
	tail		
accountable under the Management			
Health and Safety at Work Regulation			
1999, and that risk control should, who			
practicable, be achieved through			
elimination of level crossings in favour			
bridges or diversions.			
5			
The Council have a statutory responsible	lity		
under planning legislation to consult			
statutory rail undertaker where a propo			
for development is likely to result in			
material increase in the rail volume of			
material change in the character of tra	ffic		
using a level crossing over a railway:-			



	(Schedule 4 (j) of the Town & Country		
	Planning (Development Management		
	Procedure) Order, 2015) requires that		
	"development which is likely to result in a		
	material increase in the volume or a material		
	change in the character of traffic using a		
	level crossing over a railway" (public		
	footpath, public or private road) the		
	Planning Authority's Highway Engineer		
	must submit details to both the Secretary of		
	State for Transport and Network Rail for		
	separate approval. We would appreciate		
	the Council providing Network Rail with an		
	opportunity to comment on any future		
	planning policy documents. We look		
	forward to continuing to work with you to		
	maintain consistency between local and rail		
	network planning strategy. We trust these		
	comments will be considered in your		
	preparation of the forthcoming Plan		
	documents.		
139	Strategic Allocations	Support	Comments noted
		requirement for	
	It is noted that in order to enable the	strategic site	
	implementation of the Growth and Spatial		
	Strategy, Deposit RLDP Policy SP2	supported by a	
	'Regeneration Growth Area and	Masterplan	
	Sustainable Growth Area Strategic	Masterplan	
	Ũ		
	Allocations' identifies a number of strategic		
	allocations where growth will be focused.		
	These include housing allocations in the		
	Maesteg and the Llynfi Valley Regeneration		
	Growth Area and Strategic Allocation		
	SP2(5) Land East of Pyle in the Pyle, Kenfig		
	Hill and North Cornelly Sustainable Growth		
	Area. Deposit RLDP Policy SP2 requires		
	each of the Strategic Allocations to be		
	developed in line with site specific policies		
	and associated masterplan development		
	principles set out within the RLDP (Policy		
	PLA5 'Land East of Pyle, Kenfig Hill and		
	North Cornelly Sustainable Growth Area')		
	and says that a detailed masterplan will		
	need to be developed in line with this and		
	agreed with the Council prior to		
	development commencing. NPTC is		
	supportive of the requirement within Policy		
	supportive of the requirement within Policy SP2 for each strategic allocation to develop		



	Council prior to the development commencing.	
	Given the location of the proposed site allocation, NPTC would welcome the opportunity to comment on the Strategic Transport Assessment and further involvement in future discussions about the site.	
	In respect of Gypsies, Travellers and Showpeople, NPTC notes that BCBC's approach to meet all identified needs is in accordance with the duty placed on the Council through the Housing (Wales) Act 2014 to meet all identified need. In accordance with Part 3 of the Housing (Wales) Act 2014, NPTC are currently in the process of undertaking its Gypsy and Traveller Accommodation Assessment (GTAA) to assess the future accommodation of the Gypsy and Traveller Community and determine whether there is a requirement for additional site provision within NPT for permanent residential pitches and/or transit pitches in the short term and up to 2036. It would be beneficial for such studies to be considered on a wider basis and NPT would welcome future collaboration on this topic.	
408	Please accept this letter from my office as a submission to the aforementioned consultation.	It is the view of the Council that the overall objectives of the Community Involvement set out in the approved Delivery Agreement (See Appendix 5), have been met. It is a has been prepared in accordance with the LDP 'Preparation Requirements' set ou Manual (Edition 3).
	Throughout June, I received numerous requests from constituents for assistance in participating in the consultation process. I note from Bridgend County Borough Council's (BCBC) social media that residents were encouraged to participate online and submit their feedback directly. As one of the two MPs whose constituencies would be affected, I aimed to facilitate this process by advertising the proposed revised local development plan (RLDP) to constituents via my social media platforms and letters as well as hosting three public meetings and four advice surgeries. I hope	The Council previously consulted the public on the Preferred Strategy which was h 8th November 2019. Following the public consultation period, the Council was representations made in accordance with LDP Regulation 16(2) before determinin LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 – Consultation Report) for publishing. This report was subsequently signed off by mer As part of Stage 4 of the Delivery Agreement, the Council was required to undertake for a statutory period of 6 weeks, however the Council made an allowance for 8 × public participation. This was to ensure a range of views could be considered as pa wide consensus on the Replacement LDP's strategy and policies. A number of cons to ensure efficient and effective consultation and participation, in accordance wit included:
	my efforts have helped to increase the	A Legal Notice was placed within the Glamorgan Gazette on 3rd June 20

ent Scheme (CIS) as originally s also considered that the LDP out in the Development Plans

s held from 30th September to was required to consider all ning the content of the deposit 8 – Preferred Strategy & Initial members of Council.

ake Deposit public consultation 8 weeks in order to maximise part of a process of building a onsultation methods were used with the CIS. These methods

 number of responses you receive and thank you in advance for considering my comments. Feedback on specific proposals were made using the online form on the website. However, I hope you will also consider some additional feedback I've summarised below. The Consultation Process Following meetings with Councillors, stakeholders and residents, I wrote to you on the 21st July, along with multiple co- signatories, requesting a delay to the 27th July deadline. I would like to reiterate some of the points made in that letter as they were a source of deep concern and frustration for a large number of people with whom I spoke. Considering the importance of the RLDP, it has been challenging to facilitate sufficient levels of engagement in the allotted time, and the COVID pandemic has undoubtedly increased these difficulties. For a plan that will affect our entire Borough until 2033, it seems unreasonable that a little extra time couldn't be provided considering that pandemic restrictions are now being relaxed across the UK, including Wales. As outlined in a provinger correspondence 	complete an electronic sur Council buildings, including distancing guidelines. The s, by appointment only as th es of the survey form were a te by hand. individuals. Members of the
delivery of the brownfield regeneration allocations identified in the Llynfi Valley are still denoted as regeneration priorities the Areas. The ongoing commitment to brownfield development of the site-search sequence outlined in Planning Policy Wales a Best and Most Versatile (BMV) agricultural land. However, development on brownfield land in other settlements (notabl limited further brownfield regeneration opportunities remaining some greenfield sites) are therefore required to implement SF and ensure the County Borough's future housing requirements to disenfranchising a significant number of people and therefore urge you to consider the request for additional time as a matter of urgency. If this request cannot be considered until after the consultation has ended, then I ask that in the alternative an additional consultation be held so that we can address this serious issue. Should the opportunity to have additional time be made available, I'm confident that it will greatly increase the public's confidence in the	ng and postage costs for su Consultation Database was it Consultation. Approxima- cess the package of consulta- ditional representors were in e Council to run remote eng- igh. evised. A series of social is er. They drew attention to dif- tation period. ation remotely to established lities Forum and Youth Foru- s, representors were able to s any queries/concerns they y Councils to display on the the Spatial Strategy Option itises the development of late eveloped brownfield sites. I fied in the existing LDP, her- ties through their designati- nent opportunities within the ales and seeks to minimise vever, given the existing L notably Bridgend and the V maining. Additional viable an- ent SP1, deliver affordable ements can be realised.
The preparation of the Replacement LDP has involved the above to carry out the remaining works necessary	

ia Bridgend County Borough rvey online to make a formal

g every library in the County e reference copies were also he offices had not re-opened also made available at these

e public were able to request was a £25 charge for a hard uch a large document.

s notified by letter or email to ately 500 representors were tation documents and how to informed of and added to the

gagement events for all Town

media posts were released fferent thematic areas / parts

- ed working groups, including um.
- o book one-to-one telephone y may have had.
- eir notice boards.

ons Background Paper (See and within or on the periphery It continues to focus on the nce, Porthcawl, Maesteg and tion as Regeneration Growth ese settlements accords with e developmental pressure on LDP's success in delivering Valleys Gateway), there are nd deliverable sites (including e housing in high need areas

ready benefit from significant enabling transit orientated Appendix 19) to establish a hensive range of variables Bridgend and Pencoed along

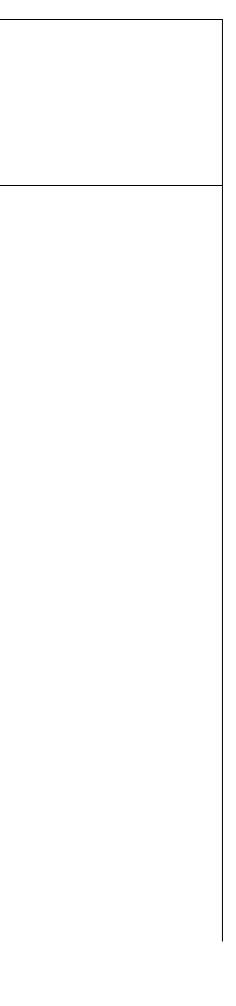
tes. Each candidate site has ology which was previously

to ensure sufficient engagement. Moreover, consulted upon (See Appendix 13 - Candidate Sites Assessment Report (2020)). During Stage 2 of the detailed it will allow BCBC an opportunity to write to assessment, sites were examined based on any specific issues they raised in terms of their deliverability, general all residents with details of how to view the location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints proposed RLDP and submit feedback which and opportunities. Site promoters were asked to prepare and submit a number of technical supporting studies to demonstrate the site's deliverability, sustainability and suitability. Proceeding this detailed assessment, only will ensure that public awareness is at the levels necessary to produce a credible, those sites deemed appropriate were included for allocation in the Deposit Plan. trusted outcome. In terms of Strategic Development Sites, Policies PLA1-PLA5 detail the site-specific requirements including Location of Residential Developments masterplan development principles and development requirements, all of which seek to contribute and address the identified key issues and drivers identified through the Replacement LDP preparation process. Sites will be required to deliver affordable housing, education provision, recreation facilities, public open space, active travel It appears that BCBC intends to achieve its new housing target (5000+ residential units) provision plus appropriate community facilities. by allowing circa 80% of those to be built in the Bridgend constituency part of the Policies PLA1-PLA5 (See Deposit Plan - Page 62) detail the site-specific requirements for the mixed-use Borough. As the MP for this area, I must Strategic Development Sites in Regeneration Growth Areas and Sustainable Growth Areas. Such requirements object to this on the grounds that this places include masterplan development principles and development requirements all of which seek to contribute and address the identified key issues and drivers identified through the Replacement LDP preparation process. This the area at serious risk of overdevelopment. There appear to be huge will be facilitated through the provision of affordable housing, on-site education provision, public open space and areas of open spaces in other parts of the active travel provision. Borough which could easily accommodate new housing, but presumably for reasons Development of this scale (sustainable urban extensions) is necessary to create sustainable communities that related to land value, BCBC has chosen will incorporate a mix of complementary uses and deliver improvements to existing infrastructure and/or provide candidate sites predominately south of the new supporting infrastructure. The latter factor is particularly notable given the school capacity issues across the M4 but including Pyle/Cornelly. County Borough and the need for new strategic sites to be significant enough in scale to support provision of a new primary school as a minimum. Impact of New Residential Units In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix Much of the feedback I've received is in 37). The IDP provides a single schedule of all necessary infrastructure without which the development of relation to the addition of thousands of new allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. Such infrastructure includes transport, education, health, environmental management, utilities in homes to already highly populated areas. The vast majority of residents informed me additional to community and cultural infrastructure. that whilst they in favour of building homes there are deep concerns about the impact In terms of GP surgeries, the Council has been engaging with Cwm Taf Morgannwg University Health Board on local services, infrastructure and traffic. from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial Schools, hospitals, GP surgeries, dentists, distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 green spaces, parks, leisure facilities, of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the shops, pubs, restaurants etc were all flagged as under intense pressure to Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working maintain facilities to meet current demand. relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be or in some cases lacking suitable facilities key to service provision planning as site allocations within the Deposit Plan progress. altogether. There appears to be little to no clear evidence from the plan that these important amenities would be developed alongside new residential units. Our area needs more than just houses, pavements and streets - the brick-and-mortar buildings we inhabit are more than just dwellings, reflecting real lived experiences of the surrounding locality. When we have endemic social issues like loneliness and

			-
	depression, social infrastructure becomes a major part of the equation for good town planning. Institutions like community		
	groups, whether they are the Scouts,		
	Girlguiding, Women's Institutes, Rotary,		
	Charities and Voluntary Associations,		
	Sports-teams, Churches, or pubs, cannot		
	just be artificially created. Indeed, it was		
	residents from the Broadlands and recently		
	developed Parc Derwen estates who co		
	conveyed the greatest frustration at		
	perceived failings from planners to ensure		
	there were enough local amenities (in		
	particular school places in the case of Parc		
	Derwen) to ensure that their estates were		
	communities, not just a collection of houses.		
	I appreciate the plan references such		
	facilities, but the experiences relayed at		
	public meetings, and on social media from		
	residents, in particular has created strong		
	feelings of anxiety about the future of many of the towns and villages in the Borough.		
14		Highlight	Comments noted – the Council acknowledges Drainage and Wastewater Manage
1-	Plans	forthcoming	and will liaise with Dŵr Cymru Welsh Water regarding future implementation.
		Drainage and	
	Whilst not necessarily a matter for	Wastewater	
	consideration at the current time, Welsh	Management	
	Water (along with all Water and Sewerage	Plans	
	Companies in England and Wales) is		
	embarking on the preparation of a Drainage		
	and Wastewater Management Plans		
	(DWMP), which will become statutory		
	documents in the next few years.		
	DWMDa will play a key rale in delivering a		
	DWMPs will play a key role in delivering a holistic, prioritised approach to the		
	management of our drainage and sewerage		
	networks in the years ahead and will		
	complement the overall planning		
	framework, including the NDF, SDP and		
	LDPs.		
	-		
1	LDPs. To maximise the potential benefits, we will		
	LDPs. To maximise the potential benefits, we will want to work very closely with LPAs (as well		
	LDPs. To maximise the potential benefits, we will want to work very closely with LPAs (as well as other Council departments) in the		
	LDPs. To maximise the potential benefits, we will want to work very closely with LPAs (as well as other Council departments) in the preparation of our DWMPs. We hope that		
	LDPs. To maximise the potential benefits, we will want to work very closely with LPAs (as well as other Council departments) in the preparation of our DWMPs. We hope that through such close collaboration, our		
	LDPs. To maximise the potential benefits, we will want to work very closely with LPAs (as well as other Council departments) in the preparation of our DWMPs. We hope that through such close collaboration, our DWMPs will be able to anticipate future		
	LDPs. To maximise the potential benefits, we will want to work very closely with LPAs (as well as other Council departments) in the preparation of our DWMPs. We hope that through such close collaboration, our DWMPs will be able to anticipate future demands on our networks, including		
	LDPs. To maximise the potential benefits, we will want to work very closely with LPAs (as well as other Council departments) in the preparation of our DWMPs. We hope that through such close collaboration, our DWMPs will be able to anticipate future		

gement Plans are forthcoming

	for ways of overcoming them. As such, we would welcome a mention of the DWMP within the LDP if possible.		
	We hope that the above information will assist you as you continue to progress the Replacement LDP and would encourage the LPA to continue to liaise with Welsh		
	Water at each stage of the process.		
142	Category C - Monitoring Framework The Council's monitoring framework provides a good starting point and it is clear the authority has considered the monitoring and review Chapter of DPM (Ed. 3), which will need to be refined through the examination sessions. The Welsh Government will work the LPA on the content of the monitoring framework as the plan progresses through the examination.	examination	Comments noted.
	Statement of General Conformity The Welsh Government is of the opinion that Bridgend's Replacement Local Development Plan (2018-2033) is in general conformity with the National Development Framework: Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3).	Future Wales	Comments noted.
	Reasons		
	<i>Scale of growth:</i> The National Development Framework: Future Wales identifies Bridgend and the valley areas as being within a National Growth Area, specifically Policy 33 (NDF, page 164). The policy states this area is to be the focus for strategic economic and housing growth within the South East region. Under the Welsh Government central estimates 66,400 additional homes are needed in the region until 2039 and over the initial 5 years (2019/20 to 2023/24) 48% of the additional homes needed should be affordable homes. The level of household growth proposed in the deposit LDP is 7,575 dwellings over the plan period, an uplift of 1,905, or 33% over		



the 2018 principal projections. This degree of aspiration aligns with Bridgend being within a national growth area. This is supported by 71.9ha of employment, looking to deliver 7,500 jobs, thereby retaining the younger cohort of employees. Collectively, these approaches support Bridgend as having a key role in the national growth area, aligning with the NDF.

Distribution of growth: The LDP has undertaken a settlement hierarchy analysis, concluding that Bridgend is the primary identifying secondary settlement, settlements, as well as directing regeneration to Porthcawl and Maesteg. The Valleys (including Maesteg) are identified in Policy 1 (NDF). The approach of focusing growth in the relevant tiers of settlements, according to service and facility provision is in direct alignment with Policy 2 (NDF) assisting the regeneration of under-performing settlements. This urban focussed approach, based on strategic place making, whilst also seeking to redress regeneration issues compliments the approach set out in the NDF.

Affordable Homes: A key priority of the Welsh Ministers is the delivery of affordable homes, as set out in Policy 7 (NDF). The LDP should maximise the potential to deliver affordable housing through the selection of sites and how they relate to the housing need on a spatial basis. The LDP is supported by a robust, high-level assessment with Statements of Common Ground on the majority of technical aspects with the industry. This aligns with the approach set out in the NDF, combined with the higher level of housing in the plan, aligning with the national growth area. The Welsh Government suggests that where further evidence has been undertaken on strategic and the remaining allocations, this is placed in the public realm before the examination of the plan.

Heat Networks/Renewable Energy.

Decarbonisation & renewable energy is a key aspect to achieve climate change targets and reduce the reliance on fossil fuels and CO2 emissions. The LDP has undertaken extensive technical work in this area, setting out targets for a multitude of different renewable sources and identifying spatial areas for specific sources. Energy Masterplans for major developments and exploring heat networks directly align with Policy 16 (NDF).		
Resilient Ecological Networks: The Environment Act (Section 6) set out a framework for planning authorities to maintain and enhance biodiversity to provide a net benefit for biodiversity through a proactive and resilient approach. Central to delivering net benefit is the production of a robust Green Infrastructure Assessment which informs the scale and location of growth and individual site selection. Policies SP17 and DNP6 of the LDP set the framework to deliver on this premise, as set out in Policy 9 (NDF). The Welsh Government notes the specific reference to biodiversity net gain in policy DNP6 (LDP) which, whilst achieving the broad outcomes should be based on a net benefit approach. Although there is broad alignment with the policy approach in the NDF, this is an area where further refinement would be advantageous. This does not impact on the issue of general conformity and can be corrected through the statutory process.	Refine references to biodiversity net gain in policy DNP6 to be based on a net benefit approach	Comments noted and accepted. Policy DNP6 will be refined to reflect a net benefit a
Comments for Consideration		
The comments below are intended to provide assistance to the authority and ensure the plan and supporting evidence better aligns with the requirements in the National Development Framework (NDF). If the authority wishes to discuss these comments in more detail, we advise you contact the Welsh Government's Planning Policy team on <u>PlanningPolicy@gov.wales</u> . • The aspiration in the NDF is for new developments in well-connected and	Clarify how the plan has sought to increase development densities, where appropriate.	SP3 outlines a range of criteria to ensure development demonstrates alignment v Design and a Sustainable Placemaking approach. This includes using "land effici which maximises the development potential of the land whilst respecting that of the Development management Policy COM6 also seek to ensure development create sustainable communities by providing a range of house types and sizes to meet the efficient and appropriate density. COM6 specifies that "in all cases, housing develop efficient use of land in accordance with sustainable, placemaking principles. Good maximise the density of development without compromising the quality of the living making adequate provision for privacy and space about dwellings". COM6 also residential densities and mixed uses must be achieved along public and mass tran opportunities for transit orientated development". The proposed policy framework the land utilised for development is used as efficiently as possible and brought forward at

it approach.

nt with the principles of Good ficiently by being of a density the surrounding development". ates mixed, socially inclusive, at the needs of residents at an elopments must make the most bod Design must be utilised to ing conditions provided, whilst so specifically states, "higher ransport hubs to maximise the k therefore seeks to ensure all d at a density which maximises

serviced urban areas to have higher		the development potential. The detailed Thematic Policies (PLA1-5) also outline the
densities (Policy 2). It should be clear how the plan has sought to increase development densities, where appropriate.		for the mixed-use Strategic Development Sites. These policies make it clear that, f must be prepared and agreed with the Council prior to development. Sustainable place the provision of "a mix of higher densities at key points in the layout and lower den edges". The proposed LDP policy framework does therefore illustrate how the place development densities, although indicative masterplans will be appended to Policies this principle within the submission version of the Plan.
• Background Paper 17: NDF Conformity Assessment could usefully be improved to make clear how the policies in the LDP conform to the 11 outcomes and policies in the NDF.	Enhance Background Paper 17 to make clear how LDP policies conform to the 11 outcomes and policies in the NDF	Comments noted and accepted. Background Paper 17: NDF Conformity Assessmen clear how the policies in the LDP conform to the 11 outcomes and policies in the ND
• Policy SP3 in the LDP should include the need for high speed digital infrastructure in all new developments. Similarly, the reasoned justification in Policy COM14 should make clear that broadband infrastructure is a requirement as set out in the NDF.	Amend Policy SP3 and COM14.	Comments noted and accepted. Policy SP3 will be amended to include the neighbor infrastructure in all new developments. The reasoned justification to Policy COM14 clear that broadband infrastructure is a requirement as set out in the NDF.
• Whilst the intentions of Policy SP17 and DNP6 are broadly in line with national policy the framing of these policies has diverged subtlety from national policy (specifically net benefit for biodiversity). PPW11 responds to the Section 6 Duty of the Environment Act by setting out a framework for planning authorities to maintain and enhance biodiversity in the exercise of their functions (providing a net benefit for biodiversity) and calling for a proactive approach towards facilitating the delivery of biodiversity and resilience outcomes. The policy in Wales is firmly one of net benefit based on maintaining and enhancing biodiversity and taking account of ecosystem resilience. It is not based on net gain and its associated metric, which is the proposed approach in England. PPW and Future Wales have been framed deliberately in terms of net benefit so as to avoid inadvertent consequences which may emerge through a net gain approach, including for example, where tick box approaches may encourage	to biodiversity net gain in policies	Comments noted and accepted. Policies SP17 and DNP6 will be refined to reflect a

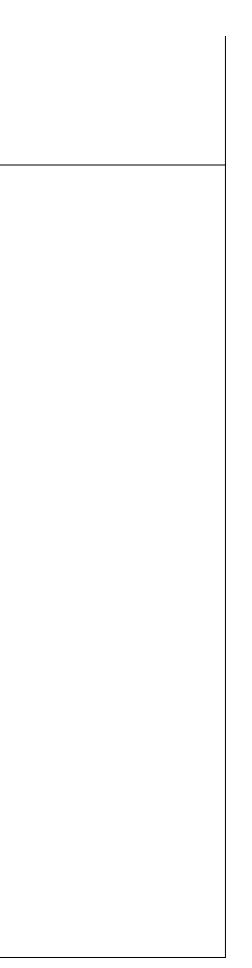
the site-specific requirements at, for each site, a masterplan placemaking principles include densities on the rural/sensitive e plan has sought to increase cies PLA1-5 to further illustrate

nent will be enhanced to make NDF.

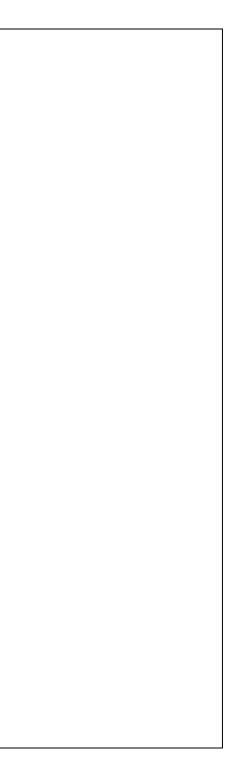
need for high speed digital /14 will be amended to make

t a net benefit approach.

	the notion that enabling loss for uncertain future gain is the acceptable norm. Whilst the intentions of the LDP are broadly in line with PPW it will be important to ensure that the mechanics of delivery are correctly expressed to ensure a net benefit approach is fully embedded in the plan.		
94	National Grid has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document. About National Grid National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses. National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use. National Grid Ventures (NGV) is separate from National Grid's core regulated businesses. NGV develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. Proposed development sites crossed or in close proximity to National Grid assets: Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. Details of the sites affecting National Grid assets are provided below. Policy ENT5: Former Ford Site, Bridgend XM ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE Policy ENT1(8) & ENT2(8): Waterton Industrial Estate XM ROUTE: 275Kv Overhead Transmission	No objection: advisory comments.	Comments noted.

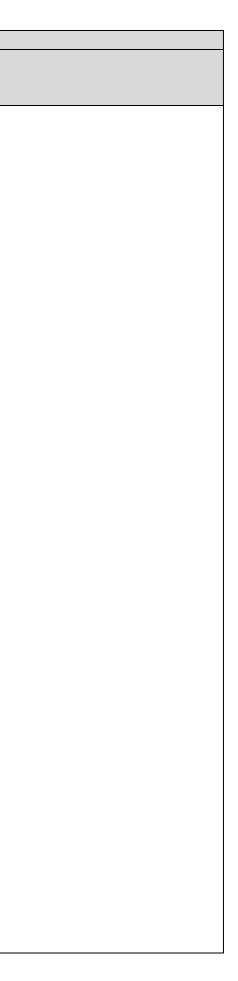


Line route: ABERTHAW - CARDIFF EAST – PYLE Policy COM1(1): Parc Afon Ewenni XM ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE Policy PLA2: Land South of Bridgend (Island Farm), Bridgend Sustainable Growth Area XM ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE Policy COM1(2): Craig y Parcau XM ROUTE: 275Kv Overhead Transmission Line route: ABERTHAW - CARDIFF EAST – PYLE	
A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to National Grid assets. Further Advice National Grid is happy to provide advice and guidance to the Council concerning their networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us. To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect their assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-	
specific proposals that could affect National Grid's assets. We would be grateful if you could check that our details as shown below are included on your consultation database.	

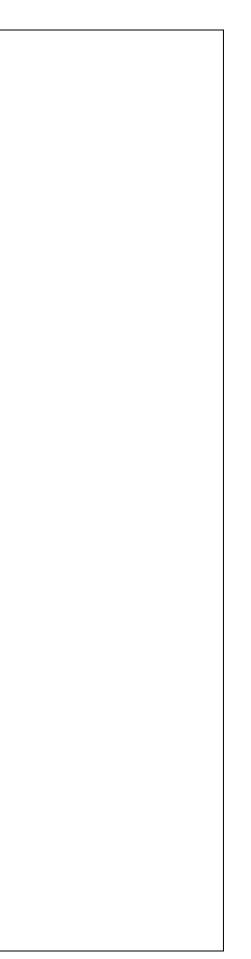


LATE SUBMISSIONS – REPRESENTATIONS AREN'T DULY MADE

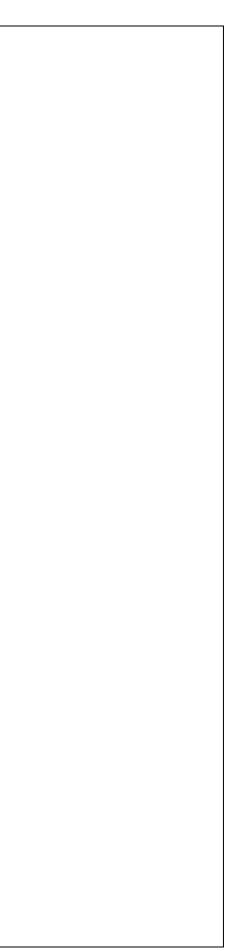
ID Comment	Summary o changes beir sought/propos	g Council response
 34 We support the intent of the and proposals to enable th sustainable development and economic, environmental and being goals are all suitably be decision-making process, development occurs in the rig. We acknowledge that you he board advice from o correspondence which has ere provisions in the Deposit Plant terms and with regard to alloc. Our detailed comments on supporting documents can be annexes to this letter. Please note that our commere prejudice to any comments we make when consulted on an formal planning applications is develop any of the land identities plan. At the time of any other there may be new informate which we will need to conside our formal advice. Finally, we look forward to work closely with you to progrand trust these commere assistance. If you have any quite require any further information not hesitate to contact us address. Annex 1 1. Deposit Consultation Doce The Deposit Consultation provides a strategic direct development and use of land sets out detailed specific polic the settlement maps, devel and site-specific allocations. 	plan's policies he delivery of ensure social, d cultural well- alanced in the so the right ght place.Support for th 	e Comments noted.



We note that the majority of comments raised in our previous response have been taken on board, specifically within Chapter 2 The Spatial Context and Chapter 3 Key Issues and Drivers. However, as noted in our Draft Pre-Deposit response we recommended that in Chapter 4 Replacement LDP Strategic Framework includes reference to landscape and green infrastructure, both of which have a major role to play in sustainable places and placemaking. DNP6: Biodiversity, Ecological Networks,		
Habitats and Species		
We welcome and support the policy's aim that development proposals must contribute to biodiversity net gain, improved ecosystem resilience and maintain, protect and enhance biodiversity ecological networks / services. With particular importance given to maintaining and enhancing the connectivity of ecological networks.	Support Policy DNP6	Comments noted.
DNP8: Green Infrastructure		
We welcome and support the policy's aim that development proposals will be expected to enhance existing Green Infrastructure assets. Such schemes will be designed to take into account the existing green infrastructure assets to ensure no fragmentation or loss of connectivity whilst maximising ecosystem resilience and ecosystem services. We also welcome the policy's reference to the Regeneration and Sustainable Growth Areas described in Policy SP1 and Strategic sites set out in Policy SP2 that provide significant opportunities in this regard given their strategic nature and scale. Furthermore, we welcome that further guidance on Green Infrastructure as part of development will be prepared as Supplementary Planning Guidance in support of the placemaking agenda and the creation of high quality and biodiverse living environments.	Support Policy DNP8	Comments noted.



DNP9: Natural Resource Protection and Public Health		
The policy states that 'All development in flood risk areas must be supported by a Flood Consequences/Risk Assessment and incorporate any mitigation measures required to avoid or manage increased flood risk.' Please note, new development will be expected to avoid unnecessary flood risk and to meet the requirements of Technical Advice Note (TAN) 15. No highly vulnerable development (as defined in TAN 15) will be permitted within Zone C2 and development will only be considered in areas at risk of flooding where it can be demonstrated that the site can comply with the justification and assessment requirements set out in TAN 15.	New development will be expected to avoid unnecessary flood risk and to meet the requirements of Technical Advice Note (TAN) 15	Comments noted.
In Section 5.5.82 you state that 'Where development proposals relate to a main river or ordinary watercourse, opportunities should be taken to incorporate in the development a riparian buffer of up to 7 metres adjoining both banks. This will allow for necessary maintenance by NRW and will protect and encourage local diversity'. We support the provision for a development free buffer however, we advise that reference to NRW and maintenance is removed from this statement. The statement could read 'This will help protect and encourage local biodiversity and give opportunity to improve connectivity'.	Remove reference to NRW and maintenance in section 5.5.82	Comments noted.
2. Habitats Regulations Assessment (HRA)		
We have reviewed the updated HRA submitted as part of this current consultation and provide the following advice.		
We welcome the detail provided in Table 3.2.7 'Consultation' and confirmation of how our previous advice, specifically in relation to the Bridgend LDP HRA has been	Welcome the detail in Table 3.2.7 in relation to the Bridgend LDP HRA	Comments noted.



1		
considered when drafting the current document.		
Several references are made in the document to 'likely significant effects' in the context of the Appropriate Assessment (AA). This is considered misleading given that 'likely significant effects' are to be dealt with in part 1 of the HRA 'The Test of Likely Significant Effects'. The AA (HRA Stage 2) is to determine whether a proposal will have an adverse effect on site integrity. As an example, in section 5.3.12 ('Effects on the Integrity of European Sites') it states 'no likely Significant Effects are anticipated from the LDP Deposit Plan through air pollution.'. This should read 'no adverse effects on site integrity.', given that this section is in reference to the Authority having undertaken an AA.	Several references have been made in the document to 'likely significant effects' in the context of the Appropriate Assessment which are considered misleading	Comments noted. It is acknowledged that the HRA AA Report should have reference adverse effects" on European Sites, rather then "likely significant effects", when su absence of likely impacts on the three European Sites considered within the HRA / confirms that HRA Stages 1 and 2 have been appropriately applied, that mitigation was only taken account of in HRA Stage 2 – AA in connection with the Deposit Plan, a has demonstrated the absence of likely adverse effects from implementation of the European Sites.
In section 6.3.9 (Habitat loss or species disruption), we welcome the removal of site 307.C1 from the LDP Deposit Plan given the overlap of this site and Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands Special Area of Conservation (SAC).	Welcome the removal of site 307.C1 from the LDP Deposit Plan	Comments noted.
We are supportive of the agreed approach in Section 6.4.1 (Mitigation), further detailed in SP17, to undertake a HRA for any relevant proposals within 2km of Glaswelltiroedd Cefn Cribwr / Cefn Cribwr Grasslands SAC with the potential to affect marsh fritillary butterfly habitat. However, in addition, due to the SAC's sensitivity to ammonia, consideration should be given to the nature of development in determining the screening distance for a HRA.	Supportive of agreed approach in Section 6.4.1. Consideration should be given to the nature of development in determining the screening distance for a HRA.	Comments noted.
In section 7.3.8 (Mitigation) we welcome the removal of sites 312.C1 and 352.C55 from the LDP Deposit Plan given the overlap of these sites with Kenfig SAC. However, in section 7.3.9, we have concerns for the increased potential for impacts on Kenfig SAC with the inclusion of site 345.C1. We recommend a 5m buffer from any protected site if there's habitat loss associated with the proposals. Given the lack of detailed	Welcome removal of sites 312.C1 and 352.C55 from the LDP Deposit Plan. Concerns regarding the inclusion of site 345.C1	Comments noted. Candidate site 345.C1 has not been allocated within the Replace progress through to Stage 2 of the Candidate Site Assessment due to the site settlement of Porthcawl which is identified as a Regeneration Growth Area (as define

nced the test of avoiding "likely summarising the presence or A AA. However, the reporting on (including policy changes) h, and that the HRA processes the Deposit Plan on relevant

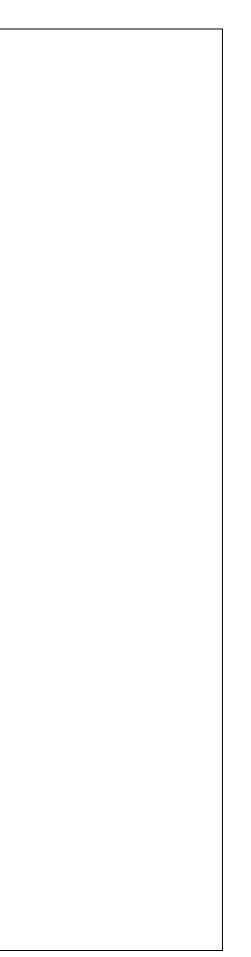
acement LDP. The site did not ite being located outside the fined by SP1).

information available at present on the proposals and the necessarily overarching and broad nature of LDP policies we are unable to comment further but are reassured at the confirmation in this section that a project specific HRA will be undertaken.		
3. Non-Technical Summary (NTS) – Sustainability Appraisal (SA)		
Whilst we acknowledge that some of our comments raised in our previous response have been take on board, we advise the following points to be re-considered:		
SA of Strategic Policies		
Section 5.3.1 indicates that no major negative (significant adverse) effects are predicted on the SA objectives and two minor effects relating to biodiversity. Table NTS5.2 summarises the SA of Strategic Policies.		
For objective 14 Landscape, all policies are considered positive except for SP4 (Sustainable Transport) and SP12 (Retail), where no clear relationship is recognised.		
It is highly unlikely that there would be no adverse effects at all on landscape character and visual amenity as a result of a Mid-Growth Option and that all effects would be positive. This is not reflected by the Candidate Sites Report. We suggest that Strategic Policies 1, 3, 6, 9, 10, 11, 13, 15 and 16 have potential to cause some adverse landscape and visual effects.	Strategic Policies 1, 3, 6, 9, 10, 11, 13, 15 and 16 have potential to cause some adverse landscape and visual effects	Comments noted. The SA of Growth Options (and all other substantive comp appropriate and the associated SA conclusions remain valid, especially as the pr detailed within the Deposit Plan aligns with the preferred spatial and growth opti stage and is supported by a detailed evidence base. All candidate sites partic Candidate Site Assessment have been assessed for their potential impact upon la
Policy SP17 does state that development will not be permitted where it would have an adverse impact on landscape character. This is contradicted in other policies that state development will be permitted where there is no significant adverse landscape impact. SP17 therefore appears to include strong landscape protection than other	Policy SP17 includes strong landscape protection than other policies in the LDP	The Deposit Plan, which must be read as a whole, provides an overarching policy delivering individual developments. This means that policies which provide support or development types, but which do not identify specific sites or set out criteria impacts (e.g. landscape), would not themselves necessarily result in adverse envi substantive components of the Deposit Plan must be considered in tandem, taki safeguards which are included within specific policies and therefore do not need t secure the application of 'policy level mitigation' for potential adverse effects from allocated sites at planning application stage, a policy mitigation schedule has been (Appendix G) and is appended to the Deposit Plan.

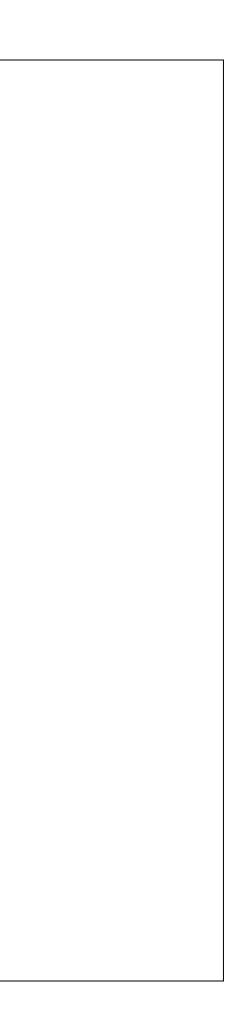
ponents) is considered to be proposed spatial strategy now tions identified at Pre-Deposit cularly during Stage 2 of the andscape and visual effects.

cy framework rather than itself rt 'in principle' for growth levels a to assess all environmental vironmental effects. Rather, all king account of environmental to be repeated elsewhere. To om development proposals on een developed through the SA

policies in the LDP, but the plan needs to be considered as a whole.		
 4. Sustainability Appraisal (SA) We welcome that the comments from NRW submitted during the previous consultation phase are responded to in Table 4.1, including those specifically relating to biodiversity and green infrastructure, and are also reflected in the updated Table 3.1. Please note, that we would welcome consultation at the earliest possible stage on all planning and proposed schemes which may adversely affect the water environment, particularly any residential developments that the SA refers to. We can also provide advice and guidance regarding pollution prevention and protection of local waterbodies from such developments. 	Welcome that the comments from NRW submitted during the previous consultation phase have been responded to in Table 4.1	Comments noted.
 1. Strategic Flood Consequences Assessment (SFCA) Planning Policy Wales (Section 6.6) describes the need to move away from flood defences and mitigation of flooding consequences. It states planning authorities should adopt a precautionary approach of positive avoidance of development in areas of flooding. It also states that development should reduce, and must not increase, flood risk on and off the development site itself. This advice is supported by Technical Advice Note (TAN) 15 which provides a precautionary framework to guide decision making. This framework includes the planning tests contained within Section 6 of TAN15. 	Guidance on SFCA	Comments noted.
Section 10 of TAN15 provides advice in respect of development plans. Paragraph 10.8 is clear that sites in Zone C2 should not be allocated for highly vulnerable development. We refer you to Welsh Government's Chief Planning Officer letter -		



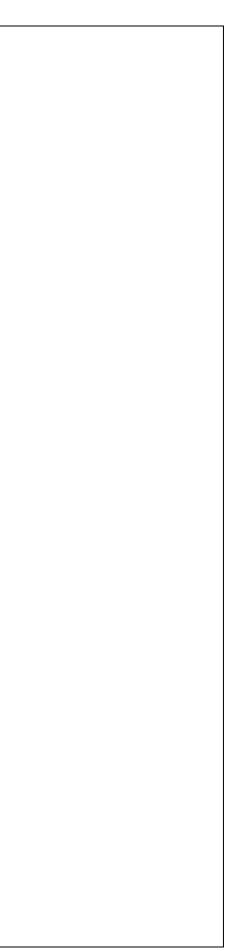
	Planning Policy on Flood Risk and		
	Insurance Industry Changes (9th January		
	2014) which affirms this policy direction.		
	,		
	Allocations for less vulnerable development		
	in C2 and allocations in C1 should only be		
	made if it can be justified that the		
	development or use is in accordance with		
	the tests in Section 6, including whether the		
	consequences of flooding are acceptable in		
	accordance with Appendix 1 of TAN15. It is		
	for the planning authority to fully explain and		
	justify the reasons for allocating a site within		
	Zone C. A proposed allocation should not		
	be made if the consequences of a flooding		
	event cannot be effectively managed.		
	Section 10 of TAN15 identifies that where		
	the local planning authority wishes to		
	allocate a site, and can justify such an		
	allocation, the local planning authority will		
	need to undertake an assessment of the		
	consequences of flooding. This assessment		
	should demonstrate that the consequences		
	of flooding have been understood and are		
	capable of being managed in an acceptable		
	way. Where such local information has		
	been produced then this should be reflected		
	in the plan. If the consequences are		
	considered acceptable in accordance with		
	section 7 and appendix 1 of TAN15, the		
	resulting allocation should include		
	annotation of flooding as a constraint for the		
	individual site on the proposals map and		
	specify the policy requirements which		
	pertain to the development of that site. This		
	should include making it clear that in taking		
	forward the allocation a developer will need		
	to undertake detailed technical assessment		
	in accordance with appendix 1, to ensure		
	that the nature of the proposed		
	development is acceptable, that it is suitably		
	designed to cope with the risk of flooding,		
	and that any funding and maintenance		
	provision is appropriate.		
	As you are aware, TAN15 is due to be		
	revised by WG. There may be a		
	requirement to review certain allocations		
	subject to the content of the new TAN.		
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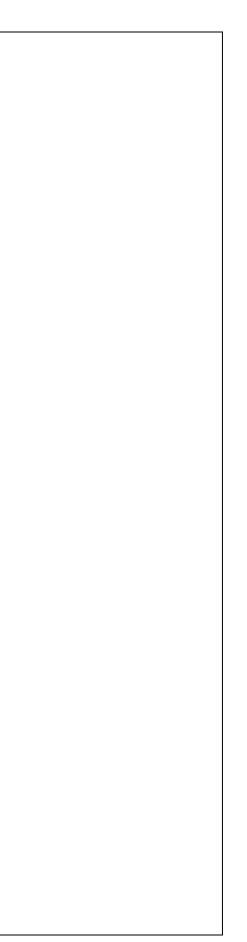
 -	-	-
The submitted SFCA covers the salient points required to provide an initial broad scale assessment of flood risk in the Borough. We note Section 5.3.3 states ' <i>Any</i> <i>available NRW detailed 1D-2D models</i> <i>available in these areas were used to inform</i> <i>the SFCA but no additional flood modelling</i> <i>was undertaken as part of the SFCA</i> <i>update.</i> ' We assume from this statement that there is no modelling to review at present, but it is accepted that updated modelling will be required, and this will need to be reviewed when submitted to NRW. We also advise the following points within the SFCA should be amended:		
In Section 7.4 'Pencoed' it states 'Development in areas of very shallow fluvial flooding in the 0.1% AEP event may need to acknowledge the inherent uncertainty in flood modelling urban environments where flooding is less than the typical curb height or property threshold (i.e. <150mm). Consequently, a more pragmatic view as to the realisation of third- party impacts may be justified.' TAN 15 is clear that there should be "no increase flood risk elsewhere" with agreed modelling tolerances set to 5mm, therefore this statement should be removed. When assessing third-party detriment as part of a FCA review, development can only comply with TAN 15 if there is no detriment.	increase flood risk elsewhere" from Section 7.4	Comments noted. Please see Bridgend Strategic Flood Consequences Assessments has removed reference to third-party detriment.
In Section 7.5 'Pyle, Kenfig and North Cornelly' it states 'Village Farm Industrial Estate: It may be appropriate to apply greater latitude to the indictive guidance of A1.14 and A1.15 as applied to this site, provided the development does not increase the vulnerability of development and will contribute to an overall improvement in flood resilience within the Estate.' Table A1.14 of TAN15 is not indictive and sets a clear threshold that developments must achieve.	developments must achieve.	Comments noted. Please see Bridgend Strategic Flood Consequences Assessments has removed wording relating to "indictive guidance".

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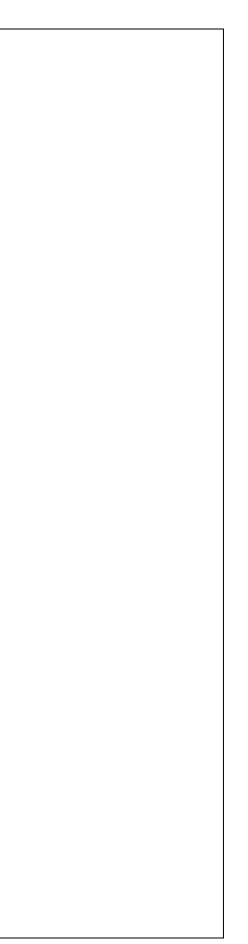
2. Proposal Maps (Site Allocations) Our detailed comments on site allocations were provided within our Draft Pre-Deposit Preferred Strategy consultation response, dated 06 November 2019 (our reference: CAS-101670-W2N8) and our Candidate Site Register response dated 3 December 2019 (our reference: CAS-103962-P856) and we continue to refer your Authority to these observations.	Comments on site allocations were provided within NRW's Draft Pre- Deposit Preferred Strategy consultation response.	Comments noted.
 Within the above responses a number of sustainable and regeneration growth areas were highlighted due to their siting within Zone C of the development advice maps referred to under TAN 15 and in particular highly vulnerable developments within zone C2. We acknowledge that these sites have been considered within the supporting SFCA and through this assessment have been categorised as either amber or green. We agree with the stance taken within the assessment that no highly vulnerable development will be located entirely outside of zone C. As noted in TAN 15 "The development at these locations will only be justified if it can be demonstrated that: - i. Its location in zone C is necessary to assist, or be part of, a local authority regeneration initiative or a local authority strategy required to sustain an existing settlement1; or, ii Its location in zone C is necessary to contribute to key employment objectives supported by the local authority, and other key partners, to sustain an existing settlement or region; and, iii It concurs with the aims of PPW and meets the definition of previously developed land (PPW fig 2.1); and, 	Agree with the stance taken within the assessment that no highly vulnerable development will be located within zone C2.	Comments noted.
iv The potential consequences of a flooding event for the particular type of development		



have been considered, and in terms of the criteria contained in sections 5 and 7 and		
appendix 1 found to be acceptable."		
Please note the justification tests do not apply to highly vulnerable development		
within zone Č2.		
Any sites within or bordering zone C will, in line with the final test (iv) above require a site-specific flood consequence assessment (FCA) to demonstrate that the		
consequences of flooding can be managed		
to an acceptable level. The nature and level		
of development and site design should be governed by the conclusions of the FCA.		
Our comments on flooding need to be considered in line with the Lead Local Flood		
Authority's comments as well as your SFCA		
findings. The LLFA will offer advice		
regarding risk from ordinary watercourses		
and surface water flooding which should be		
given the same consideration as our advice.		
In addition, we note your email from 22 July 2021 and the questions/comments therein. We have tried to provide clarity	Clarity regarding Flood Map Challenges for	Comments noted.
on the points raised below.	allocations	
Pencoed – Our latest updated model is		
from 2020 which updated FRAW. We will		
run the 1000cc and if the model is stable the		
output will be ready for update later this		
year. We have not reviewed the SFCA		
model produced in 2018 mentioned in your email but would suggest our model would		
supersede this.		
Porthcawl – In February 2019 NRW was in		
correspondence with Robin Campbell of		
Arup regarding their proposed methodology		
for modelling wave overtopping at Sandy		
Bay, Porthcawl. This was for an initial study		
and we haven't had any further input regarding the detailed design of the Coastal		
Scheme. We are therefore unable to		
comment on the accuracy of any Defended		
Area. This would require a Flood Map		
Challenge from Bridgend County Council.		



Waterton – This would require a Flood Map	
Challenge from Bridgend County Council.	
For an area to be designated as a TAN15	
•	
Defended Zone, there is strict criteria that it	
has to meet. This will be detailed in	
guidance when the new map is released,	
out in summary of the main points:	
TAN 15 defended zones have only been	
created for River and Sea flooding only,	
not surface water and small	
watercourses	
For Flood Defences built prior to 2016,	
TAN 15 defended Zones are created	
where present day, defended level of	
projection is identified;	
o 1 in 100 years for Rivers or	
o 1 in 200 year for Sea.	
• The level of protection identified in	
Defended Area Cutters does not include	
a specific allowance for freeboard where	
data has been taken from detailed	
model information, e.g. the defended	
level is taken as the crest of an	
mbankment assuming there is no	
each.	
For flood defences built from 2016	
onwards there needs to be allowance for	
a design freeboard and climate change	
(assuming 100year lifetime of	
development).	
• •	
There may be a residual risk within a	
TAN 15 Defended Zone from different	
sources. The updated TAN 15 is to set	
out how this risk should be addressed as	
part of an FCA.	
• Only created for NRW and other Risk	
Management Authorities, presumption	
against incorporating Private Defences	
in most cases. Any request to	
· · ·	
incorporating Private Defences must be	
in agreement with Welsh Government	
and meet strict criteria,	
o Large scale development of local or	
national significance.	
o Formally designated as a flood	
defence and recorded within the	
National Asset database	
	i



· · · · · · · · · · · · · · · · · · ·		
o Evidence to demonstrate		
maintenance and funding for the flood		
defence over the lifetime of the		
development.		
• In the long term it is anticipated that the		
TAN15 Defended Zones will be reviewed		
and updated every 2-3years as part of a		
formal consultation process (as directed		
by Welsh Government).		