# VOLUME 16

## DEVELOPER AND LANDOWNERS CONSULTATION RESPONSES

			rs, vision and objectives of the Deposit Replacement Local Development Plan?
ID	Comment	Summary of	Council response
		changes being	
	Ourselier 4 COD Male. To prodice the	sought/proposed	The total base is a new initial and an atial distribution there of these bases subject to give
82	Question 1 SOBJ1d - To realise the potential of Porthcawl as a premier seaside and tourist destination by prioritising the regeneration of its waterfront and investing in key infrastructure. This will also improve the attractiveness of the town as a place to live and work, whilst enhancing the vibrancy of the Town Centre. While this objective is supported, the over-reliance on the Porthcawl Waterfront Regeneration Site to deliver the town's housing requirements, should be reconsidered. This is discussed in more detail in response to other questions below. In this regard –East of Dan-y-graig, Porthcawl (Candidate Site Reference 312.C1) is considered to be a suitable and deliverable housing site in the short term.	Over-reliance on the Porthcawl Regeneration Site and a proposal to allocate 312.C1 to enhance flexibility	The total housing provision, and spatial distribution thereof, has been subject to site- enable development of the housing trajectory. The trajectory was prepared initially the respective site-promoters, followed by effective collaboration and involvement wat a Stakeholder Group Meeting. As documented within the Housing Trajectory Baa no outstanding matters of disagreement on the completion figures or the timing and period (including those sites with planning permission and new housing allocations) Stakeholder Group Meeting. The coastal setting of this site makes it particularly important to consider the impact flood risk as the majority of the site is susceptible to tidal flooding. The draft of the acknowledges that there are some large urban communities already located in an investment in flood defence infrastructure will be required to keep such existing velocement, Coastal Risk Management Programme funding velocement to the north. Phase 1 (Eastern Promenade) is designed to protect the development to the north. Phase 2 (Coney Beach) encompasses flood and coastal a Coney Beach frontage to safeguard and enhance the existing flood protection to the existing ad-hoc revetment. Implementation of these works will better protect the existing and the effects of flooding. However, they also have significant potential to achieve environmental benefits to contribute towards the statutory well-being goals of Generations (Wales) Act 2015. The greatest overall value can be achieved by com flood defence infrastructure with other investment in active travel infrastructure, pub regeneration-led development.
			benefits for the area through the delivery of Porthcawl Waterfront. On this basis Porthcawl Waterfront site can be developed in full compliance with the requirements of The defences are expected to provide a high standard of protection; significantly red areas within Zone 3 and respective areas in Zone 2. Nevertheless, all development be accompanied by a Flood Consequence Assessment to ensure the new developm to remain dry and safe as per the tolerable conditions set out in the future revised LDP's housing trajectory has factored in appropriate timescales for the completion of before forecasting dwelling completions. This presents a practical example of ho brownfield regeneration scheme in a Defended Zone in the context of the forthcomin
	SOBJ2c - To deliver the level and type of residential development to meet the identified needs of the County Borough ensuring that a significant proportion is affordable and accessible to all. This appears to be the minimum requirement in terms of meeting National policy, however there is a concern that this lacks ambition and fails to identify the role new housing has		As documented within the Strategic Growth Options Background Paper, a range analysed and subsequently refreshed to determine the most appropriate level Replacement LDP's Vision, Key Issues, Aims and Objectives. The Deposit Plan h balanced level of economic growth and housing provision, based on well informed, e regarding need, demand and supply factors (refer to the Strategic Growth Options B considered how the County Borough's demographic situation is likely to change fro the most appropriate response for the Replacement LDP. As such the Repla appropriate plan requirement to enable a balanced level of housing and employment sustainable patterns of growth, support existing settlements and maximise viable affe

te-specific phasing analysis to by through close dialogue with t with a range of stakeholders ackground Paper, there were and phasing of sites in the plan as) following conclusion of the

acts of climate change on tidal e forthcoming revised TAN15 areas at risk of flooding and g populations safe. Following g was secured for major flood he Salt Lake area and existing al erosion measures along the the frontage provided by the sting community from flooding ve wider social, economic and of the Well-being of Future mbining these investments in ublic realm improvements and

works has rendered the site a generation and placemaking usis, it is considered that the ts of the future revised TAN15. reducing the risk of flooding in ent in the area will necessarily pment incorporates resilience ed TAN15. The Replacement of coastal flood defence works how to deliver a high priority ning revised TAN15.

ge of growth scenarios were vel of growth to deliver the has been underpinned by a l, evidence based judgements Background Paper). This has from 2018-2033 and informed blacement LDP identifies an ent provision that will achieve affordable housing delivery.

	to play in supporting employment growth and the Cardiff Capital City Region Deal.		
136 6	The key issues and drivers, vision and objective identified in the Replacement LDP has been prepared in a robust and cogent manner. This sets out the land use planning commitments needed to accommodate growth and development needs over the plan period in line with national policy and guidance and supporting legislation. In addition, this is backed up by a robust evidence base, forming the basis of the emerging plan and explains how this has evolved since the Preferred Strategy (PS). We support the recognition that Bridgend demonstrates capacity for sustainable growth based on accessibility, availability of amenities and employment provision in the context of its existing population bases which is reflected within the Sustainability Appraisal (Strategic Environmental Assessment) and supporting technical evidence base. We also support the recognition of Bridgend as a hub for development, in particular for housing in accordance with the findings of the Settlement Assessment (2019, revised in 2021) and Local Housing Market Assessment (2021).	No changes being proposed. Representor supports the key issues, drivers, vision and objectives, along with the robust supporting evidence base.	Comments noted.
488	This will have a significant negative impact on an already stretched public services and public roads in the area. This does not align with a healthy active cohesive community but will impact on services to lead a healthy and safe environment. It will not protect the environment but will negatively impact on the natural wildlife and lose precious walking and cycling routes.	Concerns regarding Strategic Allocation PLA3: West of Bridgend	The Deposit Plan has been underpinned through the identification of the most ap growth and housing provision, all of which have been based upon well informed, regarding need, demand and supply factors (See Appendix 42 – Background I Strategic Growth Options). A range of growth scenarios across the whole Replace analysed and discussed within the Strategic Growth Options Background Paper. County Borough's demographic situation is likely to change from 2018-2033 and in response for the Replacement LDP. As such the Replacement LDP identifies an a to enable a balanced level of housing and employment provision that will achieve su support existing settlements and maximise viable affordable housing delivery. 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 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 regeneration opportunities rema

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

gy Options Background Paper oment of land within or on the ield sites. It continues to focus isting LDP, hence, Porthcawl, through their designation as nent opportunities within these Wales and seeks to minimise wever, given the existing LDP's ably Bridgend and the Valleys naining. Additional viable and

deliverable sites (including some greenfield sites) are therefore required to implement housing in high need areas and ensure the County Borough's future housing require
The Replacement LDP apportions sustainable growth towards settlements that alreat services, facilities and employment opportunities and are most conducive to a development. As such, a Settlement Assessment has been undertaken (See Ap sustainable settlement hierarchy. Based upon the consideration of a comprehe sustainable growth will be appropriately directed towards the Main Settlements of Br with the grouped Main Settlement of Pyle, kenfig Hill and North Cornelly.
The plan preparation has involved the assessment of 171 sites, the vast majority of candidate site has been assessed against the criteria in the Candidate Site Assessment previously consulted upon (See Appendix 13 – Candidate Sites Assessment Report detailed assessment, sites were examined based on any specific issues they deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepart technical supporting studies to demonstrate the site's deliverability, sustainability and detailed assessment, only those sites deemed appropriate were included for allocation.
As part of the proposed allocation of Land West of Bridgend, development will requirements including masterplan development principles and development require PLA3 – Page 71), all of which seek to contribute and address the identified key is through the Replacement LDP preparation process. This will be facilitated through housing, on-site education provision, public open space and active travel provision.
In terms of biodiversity/ecology, an ecological desk study and Extended Phase 1 sub 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 and its associated designated features will be retained. Furthermore, such retain protected from potential harm, damage and disturbance through the sensitive design from SINC boundaries and inclusion of suitable buffers.
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 open. When linked with proposed POS and play areas across the developable site this benefit to both visual and recreational amenity, conservation and biodiversity enhallatter, 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 fu March 2020. The Phase 1 survey concluded that the site is dominated by agricultura 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.

ment SP1, deliver affordable rements can be realised.

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

of which are greenfield. Each ment Methodology which was port (2020)). During Stage 2 ey raised in terms of their ssibility, physical character, are and submit a number of nd suitability. Proceeding this ation in the Deposit Plan.

Il be subject to site-specific rements (See Deposit Policy issues and drivers identified h the provision of affordable

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

lanning submission will need atures, including the Laleston e Laleston Meadows SINC ained features will be further gn of built development away

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

further roosting bat works in irally improved grassland of reatest ecological importance d boundaries in addition to C. The roosting bats surveys

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 matter to locate development across those habitats of predominantly limited ecolor boundary habitats as far as possible. Where retained, such features have been account informal green space and sustainable transport links, which ultimately enhances contained contributes to the wider green infrastructure resource.
Where avoidance is not possible, however, and will result in the loss of interpredominantly 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 or 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 NR the development to retain and provide suitable buffers to habitats, particularly hancient and/or Semi-Ancient Woodland) and Laleston Meadows SINC, which bordering the northern and north-western boundaries of the site. PLA3 will also require and agree ecological management plans including proposals for mitigation, enhancient ecological management plans including for bats and dormouse) compensatory and replacement habitat.
Policy PLA3 will require development to incorporate the Laleston Trail within the cent 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 p and linkages, green streets, and explore the provision of enabling sensitive public Meadows SINC and woodland.
In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has bee 37). The IDP provides a single schedule of all necessary infrastructure without allocated sites for the anticipated quantum of proposed housing/employment uses not proceed. Such infrastructure includes transport, education, health, environmen additional to community and cultural infrastructure.
The proposed allocation is supported by detailed masterplanning work, including identify a realistic dwelling yield on the site's net developable area. The Transpornumber of dwellings the site is expected to deliver. This identifies the various transport of development, and, in combination with the Strategic Transport Assessmentaken to deal with the anticipated transport impacts of the scheme. Proposed F appropriate development requirements in relation to all forms of travel. The density a considered appropriate to support a diverse community and vibrant public realm, while of people to support services such as public transport, local shops and schools. I planning policy, higher densities should be encouraged in urban centres and near m or interchanges. Given the site's location within the Primary Key Settlement of the proximity to Bridgend Town Centre, this density level is therefore considered appropriate travel no communities, further bolstered by the proposed enhancements to the active travel no support services appropriate to the active travel of the proposed enhancements to the active travelenent of the proposed enhancemen

ponds have been considered

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

ernal field boundaries (albeit te and extent to enable future I constraints and compensate ilt development away from

which are recommended to iate and proportional. These RW. Policy PLA3 will require hedgerows, trees (including n includes the green space equire the developer to submit hancement and maintenance e) and provide appropriate

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

een produced (See Appendix at which the development of s within the plan period could ental management, utilities in

g an illustrative block plan to bort Assessment reflects the ansport issues relating to the ment, what measures will be Policy PLA3 prescribes the v and mix of uses proposed is hilst generating a critical mass In accordance with national major public transport nodes the County Borough and the ropriate to foster sustainable network.

	The Replacement LDP aims to reduce private car reliance and help the County Bord set out by the Active Travel (Wales) Act 2013, with the ultimate aim of improving and a 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 fac 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 appro- measures and infrastructure are not delivered. Therefore a Strategic Transport Asse has been undertaken to consider the impact of plan proposals and help guide a 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 suitable
	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 incorporating 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 sit to the west of the site to provide a connection to the eastbound bus stop on the A473.
	Policy PLA3 will require on-site highway improvements to ensure the principal per 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.
	The site promoter's Transport Assessment confirms that the traffic effect of 850 dwel order of 269 and 243two-way movements in the AM and PM peak hours respectively,

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

lities including town centres, acilities 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 BR-58 and BRC9b. PLA3 will side of the A473, connecting east, and a widened footway 473.

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

ellings is forecast to be in the y, although this is considered

516	A strategic objective of a democratic	A strategic	worst case as attitudinal change towards travel progresses. This quantum of trips eq per minute two-way, diluted across the local highway network. The assessme development provides opportunities to create a new western edge to Bridgend in a community facilities suitable for day to-day living. In this way, the transport case for n necessary to promote sustainable travel modes before the private vehicle. The the travel planning and the locational advantages, together with the Mobility Strategy benefit for existing and new residents, significantly improving travel choice, fo social journeys and hence social inclusion. Working from home and from a thir Workhub will be encouraged from the outset, in line with Welsh Government's aspira
	government is not to 'create' or 'protect' - but to respond to wishes of the electorate. These strategic objectives are more suitable for a technocratic authoritarian type of government - which we are not - yet.	objective of a democratic government is not to 'create' or 'protect' - but to respond to wishes of the electorate	<ul> <li>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).</li> <li>It is the view of the Council that the overall objectives of the Community Involvement set out in with the approved Delivery Agreement, including the CIS have been met. It LDP has been prepared in accordance with the LDP 'Preparation Requirements' set Plans Manual (Edition 3).</li> </ul>
			The Council previously consulted the public on the Preferred Strategy of which was to 8th November 2019. Following the public consultation period the Council wa representations made in accordance with LDP Regulation 16(2) before determining LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 – Consultation Report) for publishing. This report was subsequently signed off by men
			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 v 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 consi to ensure efficient and effective consultation and participation, in accordance with included:
			<ul> <li>A Legal Notice was placed within the Glamorgan Gazette on 3rd June 2021</li> <li>The package of consultation documents were been made available online via Council's Website (www.bridgend.gov.uk/ldpconsultation). Respondents we electronic survey online to make a formal representation.</li> <li>Printed reference copies were placed within public facing Council buildings, in County Borough (fixed and mobile), subject to social distancing guidelines. also available to view at the Council's Civic Offices in Angel Street, Bridgend only as the offices had not re-opened to the public due to the pandemic. Harr were also been made available at these locations for members of the public t</li> <li>Dissemination of hard copies of information to individuals. Members of the copy of the survey by post to complete by hand (free of charge). There was a of the whole Deposit Plan to cover printing and postage costs for such a large Every individual and organisation on the LDP Consultation Database was (depending on their preference) to inform them of the availability of Approximately 500 representors were contacted, provided with details of how</li> </ul>
			consultation documents and how to respond. As the consultation progress were been informed of and added to the database upon request.

equates to just over 4vehicles ment concludes that the a self-sustaining site offering mobility provides the options design of the environment, gy means there is a major for commuting, leisure and hird-place such as a non-site irations.

th Government Development revise a development plan, nd contribute to placemaking,

nt Scheme (CIS) as originally It is also considered that the set out in the Development

as held from 30th September was required to consider all ng the content of the deposit – Preferred Strategy & Initial embers of Council.

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

via Bridgend County Borough were able to complete an

, including every library in the s. The reference copies were end, although by appointment ard copies of the survey form to complete by hand.

e public were able request a a £25 charge for a hard copy ge document.

as notified by letter or email the Deposit Consultation. ow to access the package of ssed, additional representors

describe the objectives, a meaningless - providing w General Pub Jamie Wallis simplified de especially for Wallis writes a supermark opportunities position as attraction is o easily surmis will cover ev exists in Por every chanchouse - at a means 200 needed. Porthcawl s warren of an facilities for eliminated. I new propert vehicles nea no doubt pro parking. Any for parking in lead to more During any tourists flock	average Joe' the jargon used to 'Key Issues, drivers, vision and are about as complicated and as they could have been made ery limited or no clarity to the lic. Information provided by Dr MP provides much clearer and scriptions of what is planned - Porthcawl. Based on what Dr. - 1115 new houses, a school, set, other shops and 'leisure' a premium seaside tourist coming to a nasty end. One can se that all of this construction ery open space that presently thcawl. Presuming that there's e that 1115 new homes may a minimum - 2xcar families it 0+ parking spaces will be Inevitably this will lead to seafront becoming a rabbit housing estate with all parking tourists/day trippers being Naturally, the residents of the ies will expect to park their r to their homes and BCBC will vide them with 'Resident only' tourists will be forced to look o other side streets and that will a 'resident only' parking areas. day with reasonable weather to the town, often leading to a	regarding Strategic Allocation PLA1: Porthcawl Waterfront / consultation	<ul> <li>Planning Aid Wales were commissioned by the Council to run remote engational community Councils in Bridgend County Borough.</li> <li>A comprehensive social media plan was devised. A series of social media planning Officers have presented the consultation period.</li> <li>Planning Officers have presented the consultation remotely to established we Bridgend Community Cohesion and Equalities Forum and Youth Forum.</li> <li>In place of face to face public drop in sessions, representors were able to appointments with planning officers to discuss any queries/concerns they ma to do this by emailing ldp@bridgend.gov.uk or telephoning 01656 64363.</li> <li>Posters were sent to all Town and Community Councils to display on their notice be comments noted. In terms of the consultation, the Plan has to be prepared in the conductments. The written statement has been written with the aim of being understam or jargonistic but its content must reflect the fact that it is a land use plan. The Plan an easy read summary leaflet. The Local Development Plan has to be written in a guidance set out in the LDP regulations manual.</li> <li>It is the view of the Council that the overall objectives of the Community Involvement set out in with the approved Delivery Agreement, including the CIS have been met. I LDP has been prepared in accordance with the LDP 'Preparation Requirements' Plans Manual (Edition 3).</li> <li>The Council previously consulted the public consultation neport (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 Apublic</li></ul>
During any tourists flock queue of cars With all pa 'residents of elsewhere. A this plan. Re	day with reasonable weather		also available to view at the Council's Civic Offices in Angel Street, Bridgen

agement events for all Town

media posts were released erent thematic areas / parts of

working groups, including the

o book one to one telephone hay have had. They were able

### oards.

context of national legislation nd papers and other technical andable and not too technical an has been accompanied by a particular style to meet the

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e public were able request a a £25 charge for a hard copy rge document.

as notified by letter or email of the Deposit Consultation.

sustainable places' is achieved by jamming people in to a rabbit warren. there'll be no room left for 'activities'. The new Health Centre will be swamped with another 2000 to 4000 patients to deal with (allowing for children) - the extra strain on the Health Centre could be considerable. PRODUCTIVE/PRODUCTION - shouldn't that be taking place on an industrial estate rather than on a tourist seafront? 'To protect and enhance distinctive and natural places' - these plans to bury the seafront under housing, a school and shops will do nothing to enhance Porthcawl's distinctive and natural tourist appeal. It comes across heavily that there are those with a vested interest that want to sacrifice Porthcawl's appeal as a tourist resort in to order to create a satellite housing centre for those who want to move out of Cardiff. Let's be practical here - a supermarket, a school and shops are NOT a tourist attraction. Porthcawl - at present- has a particular seaside charm with that rare advantage of having a large open space right on the front for visitors to park their cars and easily access all areas of the town. The plans as understood at present will destroy tourism. What tourist/day tripper would want to wait, sitting in their cars, in a queue, on the edge of town - hoping that a parking space on the front might become available in the next few hours so they could spend an hour on the sand/rocks? Naturally, when the tourists are killed off it could well mean the end of the long established fun fair - what joy the developers will have when the fun fair closes - more land to build more houses. It's not rocket science to see how, and why, these plans are proposed and pushed relentlessly.

Approximately 500 representors were contacted, provided with details of how to access the package of consultation documents and how to respond. As the consultation progressed, additional representors were been informed of and added to the database upon request.

- Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in Bridgend County Borough.
- A comprehensive social media plan was devised. A series of social media posts were released periodically on Facebook, LinkedIn and Twitter. They drew attention to different thematic areas / parts of the County Borough throughout the consultation period.
- Planning Officers have presented the consultation remotely to established working groups, including the Bridgend Community Cohesion and Equalities Forum and Youth Forum.
- In place of face to face public drop in sessions, representors were able to book one to one telephone appointments with planning officers to discuss any queries/concerns they may have had. They were able to do this by emailing ldp@bridgend.gov.uk or telephoning 01656 643633.
- Posters were sent to all Town and Community Councils to display on their notice boards.

The Deposit Plan has been underpinned through the identification of the most appropriate scale of economic growth and housing provision, all of which have been based upon well informed, evidence based judgements regarding need, demand and supply factors (See Appendix 42 - Background Paper 2: Preferred Strategy Strategic Growth Options). A range of growth scenarios across the whole Replacement LDP period have been analysed and discussed within the Strategic Growth Options Background Paper. This has considered how the County Borough's demographic situation is likely to change from 2018-2033 and informed the most appropriate response for the Replacement LDP. As such the Replacement LDP identifies an appropriate plan requirement to enable a balanced level of housing and employment provision that will achieve sustainable patterns of growth, support existing settlements and maximise viable affordable housing delivery.

The distribution of growth is further evaluated and justified in the Spatial Strategy Options Background Paper (See Appendix 43 – Background Paper 3). The strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites. It continues to focus 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 Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on Best and Most Versatile (BMV) agricultural land.

The Replacement LDP apportions sustainable growth towards settlements that already benefit from significant services, facilities and employment opportunities and are most conducive to enabling transit orientated development. As such, a Settlement Assessment has been undertaken (See Appendix 19) to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables the Replacement LDP will maintain Porthcawl's role as a Main Settlement capable of supporting regeneration-led growth, demonstrating capacity for sustainable growth based on its accessibility, availability of amenities and employment provision in the context of its existing population base.

The plan preparation has involved the assessment of 171 sites. Each candidate site has been assessed against 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 based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints 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, appropriate were included for allocation in the Deposit Plan.
As part of the proposed allocation of Porthcawl Waterfront, development will requirements including masterplan development principles and placemaking prin PLA1 – Page 63). The provision of new residential units, including affordable dwellin of other vital regeneration requirements comprising flood defences, public open space travel links plus education, retail and community facility provision.
A Placemaking Strategy has been developed and produced of which provides the broader vision for Porthcawl; which aims to create a premier seaside resort of region comprehensive regeneration of this key waterfront site. It proposes a sustainable complementary land uses across the area. It also proposed to retain and improve up space within Griffin Park, whilst creating significant new areas of open space along with high quality active travel routes that traverse the entire site between the harbour development of the waterfront in this manner will improve the attractiveness of the work, enhance the vibrancy of the Town Centre and deliver wider socio-economic be settlement of Porthcawl to thrive and prosper.
In terms of Salt Lake, development will include a new food store, residential (inclusion supporting commercial uses and leisure. With regards to leisure, an area north of the will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is could provide an alternative form of leisure/tourism/commercial, year rour Furthermore, the comprehensive enhancement of the Eastern Promenade with motion better landscaping provides an exciting opportunity to create an area that will not on also act, with others, to set a quality benchmark which will also need to be achieved.
Mixed-use development will be encouraged throughout the development. Commerce on the ground floor if there is market demand for such uses. Retail uses, restaurants a encouraged. This mix of uses will help bring life and vitality during the day and into t
In terms of open space, Policy PLA1 requires development of Porthcawl Water Infrastructure and Outdoor Recreation Facilities of which are to be delivered in according and Outdoor Recreation Facilities and New Housing Development Supplementary F
Additionally, there are plans for creating new facilities at Cosy Corner, including con creating employment opportunities. The plans for Cosy Corner include an all-new st which will feature new premises suitable for retail and start-up enterprises. The coun meeting space for community use, a parade square for the Sea Cadets and an offic well as changing facilities for users of the nearby marina. If funding allows, plans a enhance the scheme with new landscaping, public seating, a children's play area and of providing comfortable outdoor shelter from rain and the sun.
Strategic Policy 16: Tourism and supporting development management polic development. The LDP will also provide the framework for the provision and prote quality, tourism, sport, recreation and leisure facilities and to diversify tourism in the thereby contributing to the Aims and Priorities of the Bridgend County Destination 2022) (See Appendix 30).

t, only those sites deemed

I be subject to site-specific inciples (See Deposit Policy llings, will enable the delivery ace, leisure, enhanced active

the framework to deliver the ional significance through the ile distribution and variety of upon areas of attractive open g the seafront, supplemented our and Trecco Bay. Physical e town as a place to live and benefits that allow the broader

ncluding affordable housing), the harbour within Salt Lake cility is not delivered then the und, wet-weather attraction. new buildings, facilities and only enhance the frontage but ed elsewhere.

rcial units will be considered and cafes will be particularly the evening.

erfront to incorporate Green cordance with Policy COM10 Planning Guidance.

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

licies will promote tourism otection of well-located, good e County including Porthcawl, on Management Plan (2018-

of the reg Hillsboro Consider Waterfro of private	of car parking, it's acknowledged that a sound and robust parking strategy we generation. As part of the strategy, the site will accommodate a new multi store car par enabling more ground floor space to be given over to public ration should be given to alternative future uses as, overtime, the aspiration nt will be principally by public transport including park and ride schemes, get vehicles requiring parking facilities. Consultations confirmed widespread strategy car park whilst recognising it will change the immediate outlook of property.
2', in add parking Unalloca promotes spaces b	tial parking will be draw on good practice advice set out in 'Manual for stree dition to Supplementary Planning Guidance 17: Parking Standards. The over is one which recognises that not all parking spaces need to be allocated ted parking provides a shared resource which caters for variations in dema is the use of unallocated parking for a large proportion of the parking supply. by tourists, unallocated parking should be designed in such a way as to and should therefore mainly be off-street.
public tra Future W as a bou The loca has also regenera	hority has a strong desire to facilitate and actively encourage a modal shift ansport and the provision of a new bus terminus is integral to this as well /ales Plan. As such, a new 'bus terminus' may also be located along the Po- levard where visitors and locals could arrive at, and depart from the regene- tion of the bus terminus will enable access towards the waterfront and also the o undertaken feasibility work to explore proposals to deliver a bus termi- tion area. The bus terminus project is being brought forward in connection us project and is seen as a key element of the wider regeneration plans.
delivered required infrastruc enabling following	all large scale regeneration sites there are a range of key pieces of infrast in order to unlock the development potential of this brownfield site. In addit to facilitate the development, the regeneration area provides an opportunity cture that would mutually benefit both the proposed development and the infrastructure required to facilitate the proposed development of Porthca key requirements:
	oastal defence improvements; ew public open space;
• D	rainage infrastructure; ew road and roundabout;
• A	ctive travel improvements;
	ducation provision; and tility connections and upgrades
	of health the Council has been engaging with Cwm Taf Morgannwg Unive
outset of	the Replacement LDP process. Early meetings were held to ensure the lev
Site Ass	roposed was clarified to help facilitate alignment of service provision. As part essment, the health board amongst other consultation bodies were invite of those sites identified as suitable for future development and possible allo
Whilst th	e Council cannot ultimately control provision of primary healthcare services, nue and be maintained with Cwm Taf Morgannwg University Health Board
provision	planning as site allocations within the Deposit Plan progress. However, the identified the additional pressures created by the Local Development plan
	ainability plans articulate the action required to respond to this.

will be critical to the success storey car park on the existing lic realm and development. on is that travel to Porthcawl greatly reducing the number d support for the concept of a perties on Hillsboro Place.

eets' and 'Manual for Streets verall approach to residential ated to individual properties. hand. Therefore, this strategy y. Due to the high demand for b deter its usage for tourism

hift towards increased use of ell as being part of the wider Portway of which will function heration site and town centre. In the town centre. The Council rminus within the Porthcawl on with Cardiff Capital Region

structure that will need to be dition to the key infrastructure ity to co locate other strategic the existing town. They key cawl Waterfront includes the

versity Health Board from the evel and spatial distribution of art of Stage 3 of the Candidate ited to provide comments in illocation in the Deposit LDP. s, close working relationships rd. This will be key to service the Health Board is confident lans and that its own estates

779	Sandy Bay and Salt Lake needs to have a mix of hospitality, retail, housing and leisure. After noticing a rather concerned reaction from the local residents to initial proposals, I wanted to suggest the following ideas: - Providing a wide promenade across to Newton Point, providing plenty of space for a cycle path and al fresco dining. Ensuring buildings backing up against the beach are demolished Housing that fits in with Porthcawl as a whole and creates a good seaside setting. I'd suggest something resembling the white apartment complex overlooking Swansea Bay, next to the observatory as an inspiration The area on Mackworth Road and either side facing the bay, designed to encompass facilities for restaurants and shops The open space behind the dunes could facilitate a family friendly recreational spot, to include recreation such as an events lawn, pavilion, child friendly conservation museum and adventure area. Good examples of this can be found by looking at Coligny Beach Park or Low Country Celebration Park in the US. Without forgetting parking and the sustainability aspect, if something can be created which somewhat resembles the	Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront	Comments noted. A Placemaking Strategy has been developed and produced of wh to deliver the broader vision for Porthcawl; which aims to create a premier seaside rest through the comprehensive regeneration of this key waterfront site. It proposes as variety of complementary land uses across the area. It also proposed to retain a attractive open space within Griffin Park, whilst creating significant new areas of open supplemented with high quality active travel routes that traverse the entire site betwee Bay. Physical development of the waterfront in this manner will improve the attractive to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-e the broader settlement of Porthcawl to thrive and prosper. The seafront will also be clearly defined by the introduction of a potential recreation that links through to east and also links seamlessly with the Eastern Promena considered on the ground floor of residential development fronting the Eastern Prodemand for such uses. Ancillary commercial units will also be considered along the along Sandy Bay. In these locations retail uses, restaurants and cafes will be particul. In terms of the proposed housing on Sandy Bay, the design philosophy ensures that (and therefore denser) closer to the seafront (particularly toward the west) with low toward the middle, northern and eastern peripheries of the site.
	points detailed above, I think it would really invigorate the area and create a place both locals and tourists could enjoy.		In terms of open space, Policy PLA1 requires development of Porthcawl Water Infrastructure and Outdoor Recreation Facilities of which are to be delivered in acco and Outdoor Recreation Facilities and New Housing Development Supplementary P
			In terms of car parking, it's acknowledged that a sound and robust parking strategy w of the regeneration. As part of the strategy, the site will accommodate a new multi sto Hillsboro car par enabling more ground floor space to be given over to public 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 of private vehicles requiring parking facilities. Consultations confirmed widespread s multi storey car park whilst recognising it will change the immediate outlook of prope
			The authority has a strong desire to facilitate and actively encourage a modal shift 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 Po as a boulevard where visitors and locals could arrive at, and depart from the regener The location of the bus terminus will enable access towards the waterfront and also th has also undertaken feasibility work to explore proposals to deliver a bus term regeneration area. The bus terminus project is being brought forward in connection Metro Plus project and is seen as a key element of the wider regeneration plans.

which provides the framework resort of regional significance a sustainable distribution and and improve upon areas of ben space along the seafront, ween the harbour and Trecco veness of the town as a place economic benefits that allow

ional route along Sandy Bay nade. Commercial units be romenade, if there is market e potential recreational route cularly encouraged.

at development will be higher wer/less dense development

cape and Visual Appraisal of storey height and density e an adverse impact on the eing incorporated at detailed dramatic and positive change ssible open spaces and highvill be undertaken, in order to al assessment that will assist

erfront to incorporate Green cordance with Policy COM10 Planning Guidance.

will be critical to the success storey car park on the existing lic realm and development. on is that travel to Porthcawl greatly reducing the number support for the concept of a perties on Hillsboro Place.

hift towards increased use of ell as being part of the wider Portway of which will function heration site and town centre. the town centre. The Council rminus within the Porthcawl n with Cardiff Capital Region

847	YES	No changes proposed	Comments noted. A lack of information has been provided in order to provide a resp
996	SOBJ4 - how does building housing enhance natural spaces?	How does building housing enhance natural spaces?	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 id requirement 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 existin Maesteg and the Llynfi Valley are still denoted as regeneration priorities through Regeneration Growth Areas. The ongoing commitment to brownfield development settlements accords with the site-search sequence outlined in Planning Policy Ward developmental pressure on Best and Most Versatile (BMV) agricultural land. Howev success in delivering development on brownfield regeneration opportunities remaind deliverable sites (including some greenfield sites) are therefore required to implement housing in high need areas and ensure the County Borough's future housing required to the settlement of the site
			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 A sustainable settlement hierarchy. Based upon the consideration of a compreh sustainable growth will be appropriately directed towards the Main Settlements of B with 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 cor 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.
			The Strategy acknowledges that the County Borough has a rich and varied biodive species, habitats and unique, rich landscapes. Policies within the Deposit Plan have be from the existing LDP and will continue to protect the county borough's environment i policy and the Environment Act 2016.
			In terms of allocated Strategic Development Sites, Policies PLA1-PLA5 detail the including masterplan development principles and development requirements. Such resistes retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Model and), and SINCs. Additionally, green infrastructure and outdoor recreated and the strategic development of the strategic develop

#### sponse.

the most appropriate scale of ell informed, evidence based ackground Paper 2: Preferred ole Replacement LDP period nd 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, 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 ement SP1, deliver affordable irements can be realised.

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

te has been assessed against consulted upon (See Appendix ssment, sites were examined ation, neighbouring land uses, opportunities. Site promoters es to demonstrate the site's nt, only those sites deemed

versity with a broad range of been refreshed and updated t in line with national planning

he site specific requirements requirements will ensure that ncluding Ancient and/or Semieation facilities will be required

			to be delivered in accordance with Policy COM10 and Outdoor Recreation Fa Development Supplementary Planning Guidance.																								
329	only that brown field lands should be used over green field to match the objectives of PPG	Brownfield should be prioritised over greenfield	Comments noted. The Deposit Plan has been underpinned by the identification of of 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 ide requirement to enable a balanced level of housing and employment provision the patterns of growth, support existing settlements and maximise viable affordable house																								
			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 existin Maesteg and the Llynfi Valley are still denoted as regeneration priorities through 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. However success in delivering development on brownfield land in other settlements (notably Gateway), there are limited further 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 alre services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See Ap sustainable settlement hierarchy. Based upon the consideration of a compreh sustainable growth will be appropriately directed towards the Main Settlements of Br with the grouped Main Settlement of Pyle, kenfig Hill and North Cornelly.																								
																											The plan preparation has involved the assessment of 171 sites. Each candidate site I 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.
			Policy PLA1-5 (See Deposit Plan – Page 62) detail the site-specific requirements f Development Sites in Regeneration Growth Areas and Sustainable Growth Areas. Su a wide range of land uses including affordable housing, education, recreation facilities travel plus appropriate community facilities and commercial uses. Delivery of these fundamental in achieving the Replacement LDP's Vision and Objectives for the Court																								
			Additional long-term brownfield Regeneration Sites are also proposed for allocation ( located within parts of the County Borough that will benefit the most and also those deliver the greatest positive impacts of such growth. However, as referenced in F																								

Facilities and New Housing

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

y Options Background Paper nent of land within or on the ld sites. It continues to focus ting LDP, hence, Porthcawl, nrough their designation as ent opportunities within these Vales and seeks to minimise ever, given the existing LDP's oly Bridgend and the Valleys aining. Additional viable and ment SP1, deliver affordable irements can be realised.

ready benefit from significant enabling transit orientated Appendix 19) to establish a ehensive 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

s for the mixed-use Strategic Such development will deliver ies, public open space, active ese Strategic Sites will prove punty Borough.

n (See Policy COM1(R1-R3)), e that exhibit opportunities to Planning Policy Wales, the

			housing land supply will not be dependent on these additional long-term Regener longer lead-in times, preparatory remediation-based enabling works and more detailed delivery.
107 6	Land between Laleston and Court Colman should be excluded from the plan since it was rejected by a previous planning inspector on the grounds that 'It was undesirable that the town of Bridgend should expand to the West'. It is also contrary to Welsh Government guidance to build houses on agricultural land and areas of high biodiversity importance when there is more than sufficient brownfield land available in the borough	Comments relating to loss of green space and impact on the natural environment.	The Deposit Plan has been underpinned through the identification of the most app growth and housing provision, all of which have been based upon well informed, e regarding need, demand and supply factors (See Appendix 42 – Background P Strategic Growth Options). A range of growth scenarios across the whole Replacer analysed and discussed within the Strategic Growth Options Background Paper. Ti County Borough's demographic situation is likely to change from 2018-2033 and infi response for the Replacement LDP. As such the Replacement LDP identifies an ag 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 (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 thr 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. Howeve success in delivering development on brownfield regeneration opportunities remain deliverable sites (including some greenfield sites) are therefore required to impler housing in high need areas and ensure the County Borough's future housing require the Replacement LDP apportions sustainable growth towards settlements that altic services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See A sustainable growth will be appropriately directed towards the Main Settlements of B with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly. The plan preparation has involved
108 5	The proposed plans will take much away from the beauty of the village and	Comments relating to loss of	The Deposit Plan has been underpinned through the identification of the most app growth and housing provision, all of which have been based upon well informed, e

eration Sites, as they require ailed strategies to enable their

ppropriate scale of economic , evidence based judgements Paper 2: Preferred Strategy ement LDP period have been This has considered how the nformed the most appropriate appropriate plan requirement sustainable 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 ement SP1, deliver affordable irements can be realised.

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

of which are greenfield. Each ment Methodology which was eport (2020)). During Stage 2 ney raised in terms of their essibility, physical character, pare and submit a number of and suitability. Proceeding this ration in the Deposit Plan.

rill be subject to site-specific oment principles (See Deposit 1 hectares of retained green on of enabling sensitive public ation will also be required to parate identities and character

opropriate scale of economic evidence based judgements

	surrounding green areas which will only result in congestion and significantly busier roads through a conservation area. I do not believe that the strategic objectives will be met with the proposed plans, rather that it is a case of land being sold to developers so that more money can line their pockets. Most strikingly, there is a total disregard for the land already in place which is in clear contradiction to objective SOBJ4. There clearly has been no thought for enhancing the land and I sincerely hope that the development is stopped, as do the vast majority of people who live in Bryntirion, Cefn Glas, Broadlands and Laleston.	green space and impact on the natural environment.	regarding need, demand and supply factors (See Appendix 42 – Background P: Strategic Growth Options). A range of growth scenarios across the whole Replacerr analysed and discussed within the Strategic Growth Options Background Paper. Th County Borough's demographic situation is likely to change from 2018-2033 and info response for the Replacement LDP. As such the Replacement LDP identifies an ap 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 ( (See Appendix 43 – Background Paper 3). The strategy prioritises the developme 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 thre 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. However success in delivering development on brownfield land in other settlements (notably Gateway), there are limited further brownfield land in other settlements (notably development LDP apportions sustainable growth towards settlements that alre services, facilities and employment opportunities and are most conducive to a development LDP apportions sustainable growth towards settlements that alre sustainable settlement hierarchy. Based upon the consideration of a compreh sustainable growth will be appropriately directed towards the Main Settlements of Br with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly. The plan preparation has involved the assessment to 171 sites, the vast majority of candidate site has been assessed against the criteria in the Candidate Site Assessm previously consulted upon (See
			access to part of Laleston Meadows SINC and woodland. The proposed allocation maintain a strategic green corridor between the site and Laleston to retain the separate of these settlements whilst preventing coalescence.
223	Llanmoor agree that the key issues and	References to the	of these settlements whilst preventing coalescence. Comments noted. A log of changes will be published when the Plan is finalised.
223	drivers, vision and objective identified in the Replacement LDP has been positively prepared. It sets out how places are expected to change in land use terms to accommodate development needs over the	evidence base should be updated where applicable since the Preferred	Comments noted. A log of changes will be published when the Plan is inalised.

Paper 2: Preferred Strategy ement LDP period have been This has considered how the nformed the most appropriate appropriate plan requirement ustainable patterns of growth,

y Options Background Paper nent of land within or on the ld sites. It continues to focus ting LDP, hence, Porthcawl, nrough their designation as ent opportunities within these Vales and seeks to minimise ever, given the existing LDP's oly Bridgend and the Valleys aining. Additional viable and ment SP1, deliver affordable irements can be realised.

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

of which are greenfield. Each ment Methodology which was port (2020)). During Stage 2 ey raised in terms of their essibility, physical character, pare and submit a number of and suitability. Proceeding this ation in the Deposit Plan.

ill be subject to site-specific ment principles (See Deposit 1 hectares of retained green on of enabling sensitive public ation will also be required to arate identities and character

	plan period as set out within legislation and national policy and guidance, whilst also clearly identifying the relevant evidence base used to formulate the emerging plan and how this has evolved since the Preferred Strategy (PS). A main observation with the evidence used,	Strategy (PS) consultation.	
	is that the references should be amended where the evidence base has been updated since the Preferred Strategy (PS) consultation.		
	We support the recognition that Bridgend demonstrates capacity for sustainable growth based on accessibility, availability of amenities and employment provision in the context of its existing population bases which is reflected within the Sustainability Appraisal (Strategic Environmental Assessment) and supporting technical evidence base.		
	We also support the recognition of Bridgend as a hub for development, in particular for housing in accordance with the findings of the Settlement Assessment (2019, revised in 2021) and Local Housing Market Assessment (2021).		
610	Yes unless you're planning to provide an extra GP surgery and employ more nurses and GP's then the community will suffer	Concerns regarding provision of GP Surgeries	In relation to the provision of additional GP surgeries, the Council has been engagin University Health Board from the outset of the Replacement LDP process. Early no the level and spatial distribution of growth proposed was clarified to help facilitate all As part of Stage 3 of the Candidate Site Assessment, the health board amongst of invited to provide comments in respect of those sites identified as suitable for future allocation in the Deposit LDP. Whilst the Council cannot ultimately control pro- services, close working relationships will continue and be maintained with Cwm Health Board. This will be key to service provision planning as site allocations with
720	Agree	Support	Comments noted.
722	Agree	Support	Comments noted.
254	Issues and Drivers We welcome the recognition in 'NR1' that Bridgend acts as a hub for services, employment, housing and retail	Objectives	Comments noted. Strategic Policy SP12 of the Replacement Plan will promote Town, District and L County Borough as hubs of socio-economic activity and the focal points for a dive support the needs of the communities they serve.
	developments. We also support the recognition in 'NR2' that Bridgend acts as a major service centre, which should continue	LDP needs flexibility to attract new uses to Town Centre	As part of the technical supporting evidence base the Council has prepared a Ret which sets out evidence-based recommendations on retail need, the distribution primary shopping areas to inform policies and site allocations. Additionally, the Co

aging with Cwm Taf Morgannwg ly meetings were held to ensure e alignment of service provision. t other consultation bodies were uture development and possible provision of primary healthcare cwm Taf Morgannwg University vithin the Deposit Plan progress.

Local Centres throughout the iverse range of services which

Retail Study (See Appendix 16) on of need and the definition of Council has also undertaken a

<ul> <li>to perform a greater sub-regional role as an employment and service centre.</li> <li>'LS20' states that whilst Bridgend town centre is fulfilling its potential as a sub-regional centre, it has a lower proportion of comparison units and higher rate of vacant units than the UK average. The Replacement LDP must provide support and flexibility to enable Bridgend Town Centre to attract new uses (retail and other appropriate uses) and reduce the number of vacant units.</li> <li>Vision</li> <li>We support the recognition in the 'Spatial Vision' that Bridgend will remain the principal town, with further growth to build on its success as a regional employment, commercial and service centre.</li> <li>Objectives</li> <li>We support 'OBJ 1a', which states that Bridgend will be promoted as the Primary Key Settlement of the County Borough where major employment, commercial and residential development is focused.</li> <li>We also support 'OBJ 2d', which seeks to enable Bridgend Town Centre to become an attractive and successful regional retail and commercial destination within the Cardiff Capital Region which also meets the needs of its catchment.</li> <li>'OBJ 3n' seeks to counter-balance the locally ageing population by accommodating sustainable levels of growth to attract and retain economically active households. To support this objective the Replacement LDP must encourage attractive and diverse centres, which provide a mix of retail, commercial and</li> </ul>	<ul> <li>sense check of the evidence base in light of the Coronavirus pandemic (See Append 11: Covid-19 Policy Review). The 2019 Retail Study already identified a shift in corm online shopping, which the pandemic has accelerated. The LDP recognises that hi change especially in the short-term, hence it contains more flexible planning policies a town centres, recognising their changing roles and functions. It will be increasin accommodate a wider array of uses than just retail, including community, health, leist co-working spaces alongside areas of open space.</li> <li>The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have I existing distribution of uses and likely future requirements. In Bridgend and Maest Areas have been condensed to create a consolidated retail core. Additional Second been identified on the proposals map for Bridgend, Maesteg and Porthcawl to crepromote the potential for a wider range of uses.</li> <li>The demand/supply for larger convenience retailing is likely to be less sensitive to the However, use of sequential tests alongside careful management of out-of-centre lo avoid promotion of unsustainable travel patterns.</li> <li>The Replacement LDP ultimately seeks to allow the traditional role and function of evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, continue to be the principal locations for new retail, office, leisure and communit capitalise on and enhance the vitality and viability of centres, whilst generating incre activity.</li> </ul>
the Replacement LDP must encourage attractive and diverse centres, which	

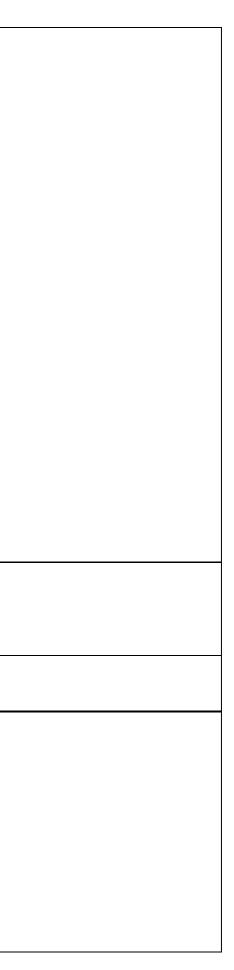
ndix 51 – Background Paper mmuter spending habits and high streets will continue to s and retail boundaries within singly important for them to sisure, residential and flexible

e been reviewed against the esteg, the Primary Shopping ondary Shopping Areas have create greater flexibility and

the impacts of the pandemic. locations will remain key to

f established retail centres to vn, District and Local Centres unity facilities. This will both creased social and economic

400	We are pleased to submit this representation on behalf of the Jehu Group Ltd (hereafter referred to as Jehu) in response to the current consultation on the Bridgend County Borough Local Development Plan (LDP) 2018-2033 Deposit Consultation Document (DCD). The land east of Bridgend Road, Pont Rhyd-y-Cyff has continuously been promoted throughout the development plan process from the Candidate Site submission in 2018 (Ref. 325.C1) followed by representations to the Preferred Strategy (PS) consultation in 2019. Jehu are therefore delighted and continue to support land to the south east of Pont Rhyd-y-Cyff being allocated for housing under Policy COM1 within the DCD. The land east of Bridgend Road extends circa 5.5ha of agricultural land is situated to the south-east of the existing built-up area of Pont Rhyd-y-Cyff, Llangynwyd. The site is capable of delivering up to 100 dwellings and associated work. Jehu have entered into the agreement with the landowner and are in a position to bring forward and deliver housing on the site within the first phase of the Replacement Local Development Plan	No changes proposed – support allocation of Land South East of Pont Rhyd-y-cyff (COM 1(3)).	Comments noted
554	Would like be kept informed as we live very near maesteg washers and have so many problems from schemes that tht council have done previously that affects the farm and my family	proposed	Comments noted
287	Support - please see covering letter submitted	No changes proposed – support	Comments noted
308	The key issues and drivers, vision and objective identified in the Replacement LDP has been prepared in a robust and cogent manner. This sets out the land use planning commitments needed to accommodate growth and development needs over the plan period in line with national policy and guidance and supporting legislation. In addition, this is backed up by a robust evidence base, forming the basis of the emerging plan and explains how this has evolved since the Preferred Strategy (PS).	No changes being proposed. Representor supports the key issues, drivers,	Comments noted.



		1	-
	We support the recognition that Bridgend demonstrates capacity for sustainable growth based on accessibility, availability of amenities and employment provision in the context of its existing population bases which is reflected within the Sustainability Appraisal (Strategic Environmental Assessment) and supporting technical evidence base. We also support the recognition of Bridgend as a hub for development, in particular for housing in accordance with the findings of the Settlement Assessment (2019, revised in 2021) and Local Housing Market Assessment (2021).		
253	SOBJ2c - To deliver the level and type of residential development to meet the identified needs of the County Borough ensuring that a significant proportion is affordable and accessible to all. This appears to be the minimum requirement in terms of meeting National policy, however there is a concern that this lacks ambition and fails to identify the role new housing has to play in supporting employment growth and the Cardiff Capital City Region Deal.	General comment that the Plan lacks ambition	This concern is not supported. As documented within the Strategic Growth Options of growth scenarios were analysed and subsequently refreshed to determine the most to deliver the Replacement LDP's Vision, Key Issues, Aims and Objectives. T underpinned by a balanced level of economic growth and housing provision, based based judgements regarding need, demand and supply factors (refer to the Background Paper). This has considered how the County Borough's demographic from 2018-2033 and informed the most appropriate response for the Replace Replacement LDP identifies an appropriate plan requirement to enable a bala employment provision that will achieve sustainable patterns of growth, suppor maximise viable affordable housing delivery.
170	SOBJ 2c - The HBF considered that the plan lack aspiration and is looking to deliver the minimum requirement in terms of meeting National Policy, it fails to identify the role new housing has to play in supporting employment growth both at a local level but also taking into account Bridgend's role in the Cardiff Capital City Deal.	Comment that the Plan lacks aspiration and fails to identify the role of new housing	This comment is not supported. As documented within the Strategic Growth Options of growth scenarios were analysed and subsequently refreshed to determine the most to deliver the Replacement LDP's Vision, Key Issues, Aims and Objectives. The underpinned by a balanced level of economic growth and housing provision, based based judgements regarding need, demand and supply factors. This has considered demographic situation is likely to change from 2018-2033 and informed the most a Replacement LDP. As such the Replacement LDP identifies an appropriate plabalanced level of housing and employment provision that will achieve sustainable existing settlements and maximise viable affordable housing delivery. It is factually inaccurate to state that, "the plan lack ( <i>sic</i> ) aspiration and is looking requirement in terms of meeting National Policy". The level of household growth pro 33% higher than Welsh Government's 2018 based principal projection. This degrised being within a National Growth Area as defined by Future Wales, whice Government in response to the Deposit Plan Consultation. This level of growth we position as a highly sustainable and accessible destination that benefits both the Corregions.
222	Bellway agree that the key issues and drivers, vision and objective identified in the RLDP has been positively prepared. It sets out how places are expected to change in land use terms to accommodate development needs over the plan period as	General support for the Key Issues, Drivers, Vision and Objectives and the designation of	Comments noted. The supporting technical documents that have been produced to detailed within Table 1 of the Written Statement. The final selection of proposed allo Candidate Site Assessment.

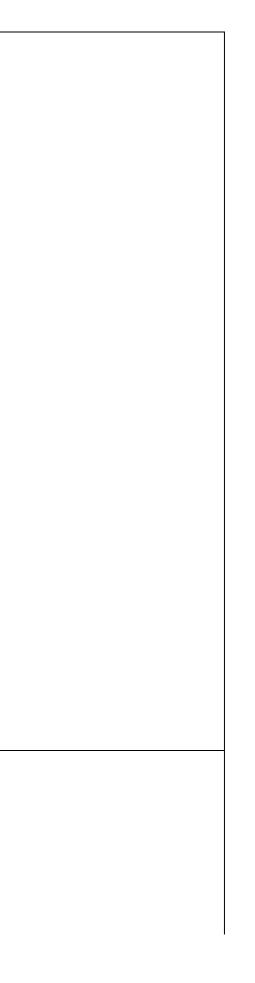
ns Background Paper, a range nost appropriate level of growth The Deposit Plan has been ed on well informed, evidencene Strategic Growth Options nic situation is likely to change lacement LDP. As such the alanced level of housing and port existing settlements and

ns Background Paper, a range nost appropriate level of growth The Deposit Plan has been ed on well informed, evidencered how the County Borough's t appropriate response for the plan requirement to enable a ble patterns of growth, support

oking to deliver the minimum proposed in the Deposit LDP is egree of aspiration aligns with hich was confirmed by Welsh will also enhance Bridgend's County Borough and the wider

to inform the Deposit Plan are locations is detailed within the

	set out within legislation and national policy	Pyle, Kenfig Hill	
	and guidance, whilst also clearly identifying	and North	
	the relevant evidence base used to	Cornelly as a	
	formulate the emerging plan and how this	Main Settlement	
	has evolved since the Preferred Strategy	and Sustainable	
	(PS). A main observation with the evidence	Growth Area.	
	used, is that the references should be		
	amended where the evidence base has		
	been updated since the Preferred Strategy		
	(PS) consultation. Bellway support the		
	recognition that Pyle/Kenfig Hill/ North		
	Cornelly act as hubs for services,		
	development. Whilst grouped together,		
	Bellway agrees that North Cornelly does		
	have a pivotal position in spreading		
	prosperity to the surrounding community.		
	In particular, Bellway support the delivery of		
	housing at North Cornelly in accordance		
	with the findings of the Settlement		
	Assessment (2019, revised in 2021) which		
	recognises that together Pyle, Kenfig Hill		
	and North Cornelly have overlapping		
	catchment areas and residents from these		
	areas would have easy access to the		
	services on offer across the broader vicinity.		
	Furthermore, the Local Housing Market		
	Assessment (LHMA) (2021) identifies that		
	most of the population growth is expected to		
	be within established settlements which		
	includes North Cornelly, where growth can		
	be accommodated in a sustainable manner.		
	The LHMA also identified a relatively high		
	unmet need for affordable housing units.		
	Bellway consider that the land at Heol Fach,		
	North Cornelly would deliver both market		
	and affordable housing in a sustainable		
	manner to support the expected growth		
	identified by the LHMA.		
221	Persimmon Homes West Wales support the	Support the	Comments noted.
	objective SOBJ1 (To Create High Quality	objective SOBJ1	
	Places) as far it recognises the importance	(To Create High	
	of Bridgend as the Primary Key Settlement	Quality Places)	
	of the County Borough where major		
	employment, commercial and residential		
	development is focused and the potential of		
	Porthcawl as a premier seaside and tourist		
	destination.		
	J		



	Persimmon Homes West Wales however object to the SOBJ1 in respect of its over- reliance on waterfront area for the delivery of housing need in the key settlement of Porthcawl.	Object to SOBJ1 in respect of its over-reliance on waterfront area for the delivery of housing need in Porthcawl	Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subject of its sustainability, deliverability and viability credentials in the same manner as all of has been a substantial change in circumstances to demonstrate the site can be delive LDP period and as indicated within the housing trajectory. The Council has now pure over Phase 1 (Salt Lake), coastal defence works are progressing on site and are or end of 2022. Partnership options are currently being explored in order to bring forwar has commenced in relation to procurement mechanisms and a formal procurement commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted be owner and a significant majority of the site is not reliant on coastal defence works owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no run be unable to progress and come forward together, as further evidenced by the extense evidence. Refer to the Housing Trajectory Background Paper. As such, the objection
139 0	Lodgeground Ltd (Dovey Estates) support the vision and objectives.	None	Comments noted.
407	N/A	No changes proposed	Comments noted.
425	Key National and Regional Issue 11 (NR11) identifies: "The need to resolve localised junction capacity issues at Junction 36 of the M4 and the Penprysg Road Railway Bridge, Pencoed to improve extant traffic flow issues and enhance future sustainable growth opportunities within the respective settlements." This is carried forward as one of the Plan's Objectives under OBJ 2i: 29783/A3/JA -2- July 2021 "Resolve localised junction capacity issues at Junction 36 of the M4 and the Penprysg Road Railway Bridge, Pencoed to improve extant traffic flow issues and enhance sustainable growth opportunities within the respective settlements in the future." We support the Council in setting out the LDP's objective to resolve localised capacity issues at Junction 36. However, the Plan does not adequately seek to resolve the issue and therefore is inappropriate (failing Test of Soundness 2). As it stands, the spatial strategy has been heavily informed by the capacity issues at J36, rather than a comprehensive assessment of the most sustainably located sites having been undertaken. The constraint imposed by the capacity issues at Junction 36 has clearly been of central importance to the way that the Council have prepared the Deposit LDP and its spatial		In considering the representation, the Local Plan Representation (document refere by Vectos (July 2021) has been reviewed (hereon referred to as "Transport Represe Firstly, it must be noted that in considering the highway implications of land west (Candidate Site Ref: 286.C2 - hereon referred to as 'Site 286.C2') reference was m and transportation studies, as discussed in LDP Transportation Background Paper should be read in conjunction with this response. The concerns raised relate to the signalised 'dumbbell' roundabout junction at M4 Welsh Government, not Bridgend County Borough Council. The junction configuratio the requirement to protect the strategic function of the M4 trunk road motorway. As detailed in LDP Transportation Background Paper 'M4 Junction 36', this junc congestion and delay and therefore, if the local highway network is not carefully mai these problems to intensify to the extent that, not only will the junction itself be movement of people <u>via all modes</u> throughout Bridgend County Borough Council, t with the possibility of queues reaching back to the M4 which will have ecc consequences. The likelihood of a Welsh Government development control objecti material adverse impact on J36 is high. All major candidate site promoters were requested to provide a detailed Transport <i>A</i> that the anticipated impact of the proposal on the highway network would not has highway safety or operation. However, no Transport Assessment was submitted for Based on the Transport Representation, it is understood that access to Site 286.C2 is Reference to LDP Transportation Background Paper 8 'M4 Junction 36' shows f workplace inflows and outflows has the highest proportion of movements associated Cardiff and Neath Port Talbot. Online journey planning tools for Site 286.C2 demons of these trips to and from the site would route through Junction 36 to utilise the M4 et the A4093 into Rhondda Cynon Taf.

bject to robust re-assessment Il other candidate sites. There elivered over the Replacement urchased and has total control e due to be completed by the ward development, initial work nent exercise is scheduled to d by the Council and a private rks to come forward. A landis likely to be brought to the preason why both phases will ensive supporting deliverability tion is not supported.

erence 194943/N02) prepared esentation").

est of Tondu Road, Bridgend made to a variety of highway per 8 'M4 Junction 36', which

*I*4 J36, which is managed by ation is therefore influenced by

unction currently experiences nanaged, there is potential for be a significant issue for the l, but also on a strategic level economic and environmental ction on any site which has a

t Assessment to demonstrate nave adverse implications on or Site 286.C2.

is likely to be from the A4063. s that 2011 Census data for ted with Rhondda Cynon Taf, nstrates that the vast majority 4 eastbound or westbound, or

strategy. As set out in the enclosed Vectos Technical Note, the evidence base on which the Deposit LDP has been drafted (as set out in the M4 Junction 36 Background Paper) is not robust and the Plan is therefore not supported by a proportionate evidence base to inform the spatial strategy. Bridgend is the County Borough's principal town and has the capacity for sustainable growth based on the town's accessibility, availability of amenities and employment provision. To rule out otherwise highly sustainable development here (such as that promoted by Taylor Wimpey Strategic Land at West Bridgend) at the plan-making stage on the basis of (limited) evidence of highway constraint at J36 would not in our view accord with the soundness test of 'ls the plan appropriate?'.

In January 2020, Bridgend County Borough Council commissioned Mott MacDonald to undertake a strategic transport assessment ('STA') to help inform the supporting evidence for the replacement LDP.

Technical Note 2 of the STA draws upon various studies, including the ongoing WelTAG process to make the following recommendation:

'Due to the lack of clarity over what, if any, future highway improvements are proposed at Junction 36 by WG it is recommended that no further expansion of development is proposed close to this M4 motorway junction during the proposed BCBC LDP plan period.'

Furthermore, if continued congestion issues at J36 prevail to an extent that route reassignment occurs (as per the theory of journey time equilibrium), the alternative route choice for car users associated with Site 286.C2 to access the M4 westbound is south via Tondu Road and subsequently through the AQMA on the A473 (Park Street) which includes a number of junctions where congestion, delay and highway safety are significant concerns.

To elaborate, in proximity of the site, the following junctions were shown in the STA to have exceeded operational capacity for the 'base plus committed development' scenario (no allowance for candidate sites):

#### Table 1: STA Capacity Analysis Non signalised junctions (Committed Development Scenario)

STA Reference	Junction Description	Junction Type	Residual Capacity AM	Residual Capacity PM
9	A4061/A473/To ndu Road roundabout	Roundabo ut	-2%	6%
12	A473/Glan-Y- Parc	Priority junction	8%	-9%
13	Heol-Y- Nant/A473 Park Street	Priority junction	-12%	-28%
23	A4063/Park Road	Roundabo ut	-24%	-19%

#### Table 2: STA Capacity Analysis Signalised junctions (Committed Development Scenario)

STA Reference	Junction Description	Junctio n Type	Degree of Saturatio n AM	Degree of Saturatio n PM
10	A473 Tondu Road/Angel Street/Park Street	Signalis ed junction	188.9%	194.6%
16	A473/B4622/Bright Hill	Signalis ed junction	256.9%	183.2%

As shown in Table 1 and 2, several nearby junctions to 'Site 286.C2' are significantly over capacity which will result in queuing and delay. In the absence of a Transport Assessment to demonstrate that the level of traffic can be accommodated, by means such as mitigation or modal shift, it is reasonable to conclude that the site will have a material adverse impact on the operation of the highway network, specifically at junction 36 and the

AQMA on Park Street. This will be to the detriment of active travel users, public trar businesses in the area.
The submitted Transport Representation produced by Vectos states in paragraph 76 1,000 dwellings has been undertaken for the access design. However, no outputs assessment assumptions with regards to traffic forecasts, design year, distribution parameters. Furthermore, there are no accompanying design drawings available to reaccess location is likely to be able to meet design standards.
The submitted Transport Representation implies that the site is well suited to enco transport, however there are no accompanying active travel route audits to substant
In the absent of suitable evidence from the 'Site 286.C' submission, the conclusion amplify existing highway capacity issues to an extent that will make conditions wo transport users and other road users through increased traffic at sensitive junctions dedicated infrastructure to prioritise sustainable forms of travel, this additional develo- at key locations in the county borough's network would have a direct negative impact pedestrians, cyclists and public transport users, who will be subject to increased traffic

Title: Do you have any comments to make on the growth strategy?			
ID	Comment	Summary of changes being	Council response
		sought/proposed	
82	Question 2 The proposed level of housing growth in the Deposit Draft RLDP is broadly supported, as is the need to allow for a greater amount of flexibility in the total buffer (i.e. 20% of required growth), given the historic problem with delivering a number of the sites allocated within the adopted LDP. The identified housing requirement makes use of the most recent household population projections and recognises the need to encourage a more youthful, skilled population base to counter- balance the ageing population, which is supported. It is encouraging that the Council recognises the direct relationship between the provision of housing land and economic growth. This of level of growth should however be considered a starting point, and if it were to be any less, it is considered that it would undermine the Council's 'CARM' ambition to ensure that the County Borough is attractive for both employers and skilled,	General support of the growth strategy and housing requirement (as a minimum).	Comments noted (refer to Strategy Growth Options Background Paper)

ransport users, residents, and

76 that junction modelling for ts are provided to confirm the utions, modal split or junction preview whether the proposed

courage sustainable forms of antiate this.

sion remains that the site will worse for active travel, public ns within the network. Without elopment traffic induced delay act on existing and prospective traffic volumes and delay.

	economically active households to expand within or move into and the Cardiff Capital City Region Deal.		
	However, we do have concerns over the deliverability of this level of growth given the overreliance on large strategic sites and their associated led-in times. The over- reliance on large strategic sites means that they may not start to deliver housing numbers until later in the plan period and land to the East of Dan-y-graig could start to deliver early in the plan period.	Concerns over overreliance on strategic sites	All strategic sites key to the delivery of the plan have been subject to greater evident their delivery, including schematic frameworks, phasing details, key transport requirements, design parameters, s106 requirements, infrastructure and costs. The degree of confidence that the sites included within the Deposit Plan are realistically full plethora of associated development requirements, infrastructure provision a necessary to deliver high-quality new communities. Moreover, an appropriate flexibility allowance (10%) has been embedded into the Dewhich is clearly set out in the Housing Trajectory Background Paper. The flexibility all that there may be certain specific circumstances, unknown at the plan making stag sites, notwithstanding the robust frontloading of site delivery evidence. This is a large specifically to enable the Replacement LDP's housing requirement to remain comfort that a strategic site fails to come forward as anticipated at this point of plan prepar allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable throug a significant unforeseen scenario, such as non-delivery of a strategic site, should or the trajectory was prepared initially through close dialogue with the respective seffective collaboration and involvement with a range of stakeholders at a Stake documented within the Housing Trajectory Background Paper, there were maked ocumented within the Housing Trajectory Background Paper, there were maked by the planning permission and new housing allocations) following conclusion the stage.
			Meeting. As such, the proposal to include Candidate Site 312.C1 is not supported and is a Strategy. The total level of housing provision within the Deposit Plan is set app allowance to ensure delivery of the housing requirement, taking into account the po- unforeseen issues in accordance with the Development Plans Manual.
136 6	Llanmoor supports the Sustainable Growth Strategy outlined in Policy SP1 as it prioritises the delivery of additional growth to existing settlements in a sustainable manner allowing the County Borough to prosper. Llanmoor specifically supports the identification of Bridgend as a Sustainable Growth Area within Policy SP1 given its status as the Primary Key Settlement of the County Borough. However, the order in	Supports growth strategy, proposes as re- ordering the growth areas within SP1.	As detailed within the Spatial Options Background Paper, the Spatial Strategy see land use framework that helps realise the regeneration aspirations and priorities of th the need to deliver future housing requirements up to 2033. Regeneration Gro Sustainable Growth Areas within SP1 to clearly highlight a necessary degree of con LDP. The undeveloped brownfield regeneration allocations identified in the existin retained and supplemented with sustainable urban growth in settlements that demo service and transportation functions. This approach is essential to implement the long embodied within the Replacement LDP Vision. As such, the proposal to re-order the not supported.
	which the growth areas are listed for regeneration and sustainable development should reflect the settlement hierarchy in terms of scale, role and function as set out in previous policy SF1: Settlement Hierarchy and Urban Management as		

lence requirements to support ort corridors, critical access This process provides a high ly deliverable, considering the and placemaking principles

Deposit Plan and the basis for allowance recognises the fact age, that delay the delivery of ge flexibility allowance, chosen ortably deliverable in the event paration. With a 10% flexibility ughout the plan period even if occur.

e site-promoters, followed by keholder Group Meeting. As no outstanding matters of plan period (including those on of the Stakeholder Group

s also contrary to the Spatial appropriately with a flexibility potential for non-delivery and

eeks to continue to provide a f the Council, whilst balancing Growth Areas appear before ontinuity with the first adopted sting LDP are proposed to be nonstrate strong employment, ong term regeneration strategy he growth areas within SP1 is

	previously set out in the PS consultation document.		
	It is acknowledged that Background Paper 2: Strategic Growth Options provides a refresh of evidence used to inform the housing provision underpinning the Replacement Bridgend Local Development Plan. This is considered appropriate in light of the latest population and household projections issued by Welsh Government which update the 2014 based equivalents. Whilst the long-term outlook on births and deaths have been dampened, the refreshed demographic evidence does not warrant a fundamental departure from the growth levels set out in the Preferred Strategy (PS). As previously stated to the PS, the mid- growth options which includes the delivery of 505 dwellings per annum is considered reasonable however it should be considered a minimum figure. As such, emerging Policy SP1 should be amended to state that the Plan will make provision for 'a minimum of 9,207 new homes to meet the housing requirement of 7,575 dwellings (based on 20% Flexibility Allowance), including 1,977 affordable new homes'.	Proposal to re- word SP1 to make the dwelling provision (inclusive of the flexibility allowance) a minimum in order to deliver the housing requirement.	The rationale for the Growth Strategy is detailed within the Strategic Growth Options support for the Growth Strategy is noted. An appropriate flexibility allowance (10%) h Deposit Plan and the basis for which is clearly set out in the Housing Trajectory Backg allowance recognises the fact that there may be certain specific circumstances, ur stage, that delay the delivery of sites, notwithstanding the robust frontloading of site large flexibility allowance, chosen specifically to enable the Replacement LDP's hou comfortably deliverable in the event that a strategic site fails to come forward as anti preparation. With a 10% flexibility allowance, the Anticipated Annual Build Rate (AA throughout the plan period even if a significant unforeseen scenario, such as non-should occur. As such, the proposal to set the total dwelling provision (inclusive of the minimum to deliver the dwelling requirement is not supported. The total level of h Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the flexibility allowance itself is not the minimum requirement, it has been set to ensure above the housing requirement to account for non-delivery and unforeseen issu Development Plans Manual.
	In order to deliver the growth strategy, Llanmoor supports the allocation of Land West of Bridgend SP2 (3) under Policy SP2: Regeneration Growth Areas and Sustainable Growth Area Strategic Allocations. Llanmoor have continued to work with the Council in providing both technical and viability evidence to demonstrate the viability and deliverability of the site. Further comments relative to the allocation of Land West of Bridgend SP2 (3) are made under the appropriate heading within these written representations.	No proposed changes. Supports allocation of Land West of Bridgend as a means of delivering the growth strategy.	Comments noted.
488	This will impact on public services, shops, doctors, schools and hospitals.	Concerns regarding infrastructure	Comments noted. The Council has been engaging with Cwm Taf Morgannwg Univer- outset of the Replacement LDP process. Early meetings were held to ensure the level growth proposed was clarified to help facilitate alignment of service provision. As part Site Assessment (See Appendix 13: Candidate Sites Assessment Report (2020)), other consultation bodies were invited to provide comments in respect of those site future development and possible allocation in the Deposit LDP. Whilst the Counc provision of healthcare services, close working relationships will continue and be

ns Background Paper and the ) has been embedded into the ckground Paper. The flexibility unknown at the plan making te delivery evidence. This is a ousing requirement to remain inticipated at this point of plan AABR) will remain deliverable on-delivery of a strategic site, f the flexibility allowance) as a f housing provision within the the housing requirement. The ure there is sufficient flexibility sues in accordance with the

versity Health Board from the evel and spatial distribution of art of Stage 3 of the Candidate )), the health board amongst sites identified as suitable for ncil cannot ultimately control be maintained with Cwm Taf

		Morgannwg University Health Board. This will be key to service provision planning Deposit Plan progress.
		Additionally, an Infrastructure Delivery Plan (IDP) has been produced (See Append single schedule of all necessary infrastructure without which the development anticipated quantum of proposed housing/employment uses within the plan period infrastructure includes transport, education, health, environmental management community and cultural infrastructure.
516	These are imposed strategies, not arising from the needs and desires of those who pay your wages, the council taxpayer. If it wasn't for all the regulations, restrictions and unnecessary costs associated with	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).
	running businesses we'd all be far more 'economically active'. Look what you've done to Bridgend Indoor Market. You should hang your heads in shame.	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 be need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferred 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 ap 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 ( (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 through 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. However success in delivering development on brownfield land in other settlements (notably Gateway), there are limited further 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 alre services, facilities and employment opportunities and are most conducive to e development. As such, a Settlement Assessment has been undertaken (See Ap sustainable settlement hierarchy. Based upon the consideration of a comprehe sustainable growth will be appropriately directed towards the Main Settlements of Br with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
		In terms of retail, Strategic Policy SP12 of the Replacement Plan will promote Town throughout the County Borough as hubs of socio-economic activity and the focal postervices which support the needs of the communities they serve.
		As part of the technical supporting evidence base the Council have prepared a Reta of which sets out evidence-based recommendations on retail need, the distribution of primary shopping areas to inform policies and site allocations. Additionally, the Court

ng as site allocations with the

endix 37). The IDP provides a nt of allocated sites for the riod could not proceed. Such ent, utilities in additional to

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 formed the most appropriate appropriate plan requirement sustainable 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 Wales and seeks to minimise ever, given the existing LDP's bly Bridgend and the Valleys aining. Additional viable and ement SP1, deliver affordable irements can be realised.

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

vn, District and Local Centres points for a diverse range of

etail Study (See Appendix 16) n of need and the definition of puncil have also undertaken a

			sense check of the evidence base in light of the pandemic (See Appendix 51 – Back Policy Review). The 2019 Retail Study already identified a shift in commuter s shopping, which the pandemic has accelerated. The LDP recognises that high stre- especially in the short-term, hence it contains more flexible planning policies and re- centres, recognising their changing roles and functions. It will be increasingly importa a wider array of uses than just retail, including community, health, leisure, resider spaces alongside areas of open space.
			The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have existing distribution of uses and likely future requirements. In Bridgend and Maes Areas have been condensed to create a consolidated retail core. Additional Secon been identified on the proposals map for Bridgend, Maesteg and Porthcawl to consolide the potential for a wider range of uses.
			The Replacement LDP ultimately seeks to allow the traditional role and function of evolve and adapt appropriately. The hierarchy will be used positively to ensure Town continue to be the principal locations for new retail, office, leisure and commun capitalise on and enhance the vitality and viability of centres, whilst generating incr activity.
707	When it comes to homes and jobs the 'balance' has been off centre for a very long time. Fancy acronyms do not guarantee that jobs will automatically be created. One only has to look at how manufacturing jobs have disappeared over the years in South Wales with major employers shutting down their operations and moving them elsewhere - either to other UK locations where business rates may be lower and/or subsidised or	Concerns regarding employment	Comments noted. The Deposit Plan has been underpinned by the identification of the 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 2018-2 appropriate response for the Replacement LDP. As such the Replacement LDP id requirement to enable a balanced level of housing and employment provision the patterns of growth.
	rates may be lower and/or subsidised or else moved overseas. How often have prospective employers been given gov't. grants to supposedly start a business only for that 'business' to soon go in to administration with the grant nowhere to be seen. This strategy is well and good - in a perfect world - but practically - there is very little to prove that employers want to come to this area. They all seem to want to leave.		Over 30% of the County Borough's population is projected to be aged 60+ by 2033 growth across this age group, there is likely to be a broad reduction in local economic does not facilitate sustainable levels of economic growth to offset this phenomene therefore seeks to deliver sustainable forms of growth that will attract and retain economic within the County Borough. As justified within the Strategic Growth Options Backgroup and Sustainable Growth Strategy is largely driven by households within the 35-44 projected to support an increase in people in workplace based employment or accommodated through provision of up to 7,500 additional jobs.
	Putting up hundreds of homes that prospective buyers may not be able to maintain payments on is like a case of putting the cart before the horse. Shouldn't the jobs be secured first before committing to burying your open spaces?		A positive employment land response is necessary to achieve an equilibrium betw skilled labour force and job opportunities in order to stimulate the local to regional ec- Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix labour force boost alongside other employment trends including past take up of e based economic forecasts. The resulting evidence base has informed the scale and need and the land best suited to meet that need over the plan period in the conte- and Technical Advice Note 23, justified further in the Employment Background Pape
			Whilst it is beyond the scope of the LDP to guarantee that employers will come to the SP11 by allocating new employment land for development. Policy ENT2 supports employment function of existing business and employment sites. This will enable come forward.

treets will continue to change retail boundaries within town tant for them to accommodate ential and flexible co-working

ve been reviewed against the lesteg, the Primary Shopping ondary Shopping Areas have create greater flexibility and

of established retail centres to wn, District and Local Centres unity facilities. This will both creased social and economic

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

33. With absolute and relative nomic activity rates if the Plan enon. The Replacement LDP conomically active households ound Paper, the Regeneration 44 age group. This growth is over the Plan period, to be

tween new homes, a growing economy. The 2019 Economic ix 15) analysed this projected employment land and sector nd distribution of employment text of Planning Policy Wales oper, and set out in SP11.

ne area, Policy ENT1 supports rts SP11 by safeguarding the e a range of different sites to

779	By creating an area with affordable apartments, indoor and outdoor leisure facilities, shop and restaurants that attract both old and young, an open events park/lawn used in a similar pay to Plymouth Park, Penarth, where young people are attracted to its use as a group workout, yoga or general meetup hub. I could only speculate that this would be an attractive proposition for high tech businesses, interested in setting up commercial premises in an around Bridgend, knowing there is a thriving population of a young professional community right on their doorstep.	Create an area with affordable apartments, indoor and outdoor leisure facilities, shop and restaurants that attract both old and young, an open events park/lawn used in a similar pay to Plymouth Park, Penarth	local housing needs, including 30% affordable housing units to be integrated throug In terms of Salt Lake, development will include a new food store, residential (inc supporting commercial uses and leisure. With regards to leisure, an area north of th will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel fact site could provide an alternative form of leisure/tourism/commercial, year rour Furthermore, the comprehensive enhancement of the Eastern Promenade with n better landscaping provides an exciting opportunity to create an area that will not on also act, with others, to set a quality benchmark which will also need to be achieved Mixed-use development will be encouraged throughout the development. Commerc on the ground floor if there is market demand for such uses. Retail uses, restaurants a encouraged. This mix of uses will help bring life and vitality during the day and into the Sandy Bay will accommodate public open space, residential, education provision a open space, Policy PLA1 requires development of Porthcawl Waterfront to incorpora Outdoor Recreation Facilities of which are to be delivered in accordance with P Recreation Facilities and New Housing Development Supplementary Planning Guid Additionally, there are plans for creating new facilities at Cosy Corner, including corr creating employment opportunities. The plans for Cosy Corner, including an all-new st which will feature new premises suitable for retail and start-up enterprises. The count meeting space for community use, a parade square for the Sea Cadets and an offic well as changing facilities for users of the nearby marina. If funding allows, plans a enhance the scheme with new landscaping, public seating, a children's play area and of providing comfortable outdoor shelter from rain and the sun. 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 g
847	NO	No changes	Comments noted.
		proposed	
996	Building housing on prime locations will not	Concerns	Comments noted. The Deposit Plan has been underpinned through the identificati
	attract a younger population as they are	regarding	scale of economic growth and housing provision, all of which have been based up
	unlikely to be able to afford such properties.	Strategic	based judgements regarding need, demand and supply factors (See Appendix 4
		Allocation PLA1:	Preferred Strategy Strategic Growth Options). A range of growth scenarios across th
l		Porthcawl	period have been analysed and discussed within the Strategic Growth Options Ba
ĺ		Waterfront /	considered how the County Borough's demographic situation is likely to change from
		affordability	the most appropriate response for the Replacement LDP. As such the Repla

which provides the framework resort of regional significance a sustainable distribution and and improve upon areas of ben space along the seafront, ween the harbour and Trecco veness of the town as a place -economic benefits that allow

lling sizes and types to meet ghout the development.

ncluding affordable housing), f the harbour within Salt Lake acility is not delivered then the bund, wet-weather attraction. new buildings, facilities and only enhance the frontage but ed elsewhere.

ercial units will be considered s and cafes will be particularly the evening.

and commercial. In terms of rate Green Infrastructure and Policy COM10 and Outdoor dance.

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

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

ation of the most appropriate upon well informed, evidence 42 – Background Paper 2: the whole Replacement LDP Background Paper. This has rom 2018-2033 and informed placement LDP identifies an

			appropriate plan requirement to enable a balanced level of housing and employmer sustainable patterns of growth, support existing settlements and maximise viable af
			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 existing Maesteg and the Llynfi Valley are still denoted as regeneration priorities that Regeneration Growth Areas. The ongoing commitment to brownfield development settlements accords with the site-search sequence outlined in Planning Policy Watevelopmental pressure on Best and Most Versatile (BMV) agricultural land.
			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 A sustainable settlement hierarchy. Based upon the consideration of a comprehen Replacement LDP will maintain Porthcawi's role as a Main Settlement capable of growth, demonstrating capacity for sustainable growth based on its accessibility, a employment provision in the context of its existing population base.
			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 locati existing use(s), accessibility, physical character, environmental constraints and of 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 part of the proposed allocation of Porthcawl Waterfront, development will requirements including masterplan development principles and placemaking prin PLA1 – Page 63). The provision of new residential units, including affordable dwelli of other vital regeneration requirements comprising flood defences, public open spatravel links plus education, retail and community facility provision.
			Policy PLA1 will ensure that development incorporates an appropriate mix of dwell local housing needs, including 30% affordable housing units to be integrated throug
329	only that my area Nantymoel has scope for small growth if brown field land if available and close to adjacent terrace houses	Nantymoel has scope for small growth if brown field land is available and close to adjacent terrace houses	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 id requirement 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

ent provision that will achieve affordable housing delivery.

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 Wales and seeks to minimise

ready benefit from significant o enabling transit orientated Appendix 19) to establish a ensive range of variables the of supporting regeneration-led , availability of amenities and

te has been assessed against consulted upon (See Appendix ssment, sites were examined ation, neighbouring land uses, opportunities. Site promoters es to demonstrate the site's nt, only those sites deemed

Il be subject to site-specific rinciples (See Deposit Policy ellings, will enable the delivery bace, leisure, enhanced active

elling sizes and types to meet ughout the development.

the most appropriate scale of ell informed, evidence based ackground Paper 2: Preferred ole Replacement LDP period ad 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

			on the delivery of the brownfield regeneration allocations identified in the existin Maesteg and the Llynfi Valley are still denoted as regeneration priorities the Regeneration Growth Areas. The ongoing commitment to brownfield developmen 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 land in other settlements (notable Gateway), there are limited further 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 required
			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 A sustainable settlement hierarchy. Based upon the consideration of a compreh sustainable growth will be appropriately directed towards the Main Settlements of B with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly. As su Strategy does not identify Nantymoel as a location for strategic growth.
			However, an Urban Capacity Study (UCS) (See Appendix 39) has been prepared of the potential urban capacity of the County Borough's settlements for housing to evand windfall site allowance rate. The UCS identifies more than sufficient capacity with boundaries to accommodate this particular component of the housing supply. It ser developers who are seeking to identify potential development opportunities not a Replacement LDP.
107 6	The expectation of 500 jobs being created in the borough per year is highly optimistic since most big employers have gone and small companies are having to pay up to 10 times the going rate for industrial land to provide a car park for their workers.	Comments relating to employment infrastructure within the borough.	In terms of employment opportunities, over 30% of the County Borough's population by 2033. With absolute and relative growth across this age group, there is likely to be economic activity rates if the Plan does not facilitate sustainable levels of econ phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of retain economically active households within the County Borough. As justified we Options Background Paper, the Regeneration and Sustainable Growth Strategy is law within the 35-44 age group. This growth is projected to support an increase in period, to be accommodated through provision of up to 7
			A positive employment land response is necessary to achieve an equilibrium betw skilled labour force and job opportunities in order to stimulate the local to regional eco Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix labour force boost alongside other employment trends including past take up of el based economic forecasts. The resulting evidence base has informed the scale and need and the land best suited to meet that need over the plan period in the contex and Technical Advice Note 23, justified further in the Employment Background Pape
108	There have been a high number of housing developments in the Bridgend area in which these objectives can still be met. The issue is the destruction of the surrounding land and congestion through a conservation area.	Concerns relating to over- development within the borough and impact of congestion on the conservation area.	The Deposit Plan has been underpinned through the identification of the most app growth and housing provision, all of which have been based upon well informed, e regarding need, demand and supply factors (See Appendix 42 – Background P Strategic Growth Options). A range of growth scenarios across the whole Replacer analysed and discussed within the Strategic Growth Options Background Paper. T County Borough's demographic situation is likely to change from 2018-2033 and infor response for the Replacement LDP. As such the Replacement LDP identifies an ap to enable a balanced level of housing and employment provision that will achieve sus support existing settlements and maximise viable affordable housing delivery.
L	1	1	

sting LDP, hence, Porthcawl, hrough their designation as ent opportunities within these Wales and seeks to minimise ever, given the existing LDP's bly Bridgend and the Valleys aining. Additional viable and ement SP1, deliver affordable irements can be realised.

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

of which provides analysis of evidence the expected small vithin the proposed settlement erves as a useful resource to t specifically allocated in the

on is projected to be aged 60+ be a broad reduction in local conomic growth to offset this of growth that will attract and within the Strategic Growth a largely driven by households of people in workplace based of 7,500 additional jobs.

tween new homes, a growing economy. The 2019 Economic ix 15) analysed this projected employment land and sector nd distribution of employment text of Planning Policy Wales oper, and set out in SP11.

ppropriate scale of economic , evidence based judgements Paper 2: Preferred Strategy ement LDP period have been This has considered how the nformed the most appropriate appropriate plan requirement sustainable patterns of growth,

	1	r	r
			The distribution of growth is further evaluated and justified in the Spatial Strategy (See Appendix 43 – Background Paper 3). The strategy prioritises the developmen 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 thr 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. However, success in delivering development on brownfield regeneration opportunities remained eliverable sites (including some greenfield sites) are therefore required to implement housing in high need areas and ensure the County Borough's future housing required. The Replacement LDP apportions sustainable growth towards settlements that alreader services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See Assustainable growth will be appropriately directed towards the Main Settlements of B with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
			The plan preparation has involved the assessment of 171 sites, the vast majority of candidate site has been assessed against the criteria in the Candidate Site Assessment previously consulted upon (See Appendix 13 – Candidate Sites Assessment Represented assessment, sites were examined based on any specific issues the deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepart technical supporting studies to demonstrate the site's deliverability, sustainability and detailed assessment, only those sites deemed appropriate were included for allocation.
			As part of the proposed allocation of Land West of Bridgend, development will requirements including a range of placemaking principles and masterplan developm Policy PLA3 – Page 71). The proposed allocation will be required to provide 4.1 infrastructure and new areas of public open space as well as exploring the provision access to part of Laleston Meadows SINC and woodland. The proposed allocation maintain a strategic green corridor between the site and Laleston to retain the separ of these settlements whilst preventing coalescence.
223	Llanmoor supports the Sustainable Growth Strategy outlined in Policy SP1 as it prioritises delivery of additional growth to existing settlements in a sustainable manner allowing the County to prosper. Llanmoor specifically supports the identification of Bridgend as a Sustainable Growth Area within Policy SP1 given its status as the Primary Key Settlement of the	Support growth strategy, proposes re- ordering the growth areas within SP1. Proposal to re- word SP1 to make the dwelling	As detailed within the Spatial Options Background Paper, the Spatial Strategy see land use framework that helps realise the regeneration aspirations and priorities of the the need to deliver future housing requirements up to 2033. Regeneration Gro Sustainable Growth Areas within SP1 to clearly highlight a necessary degree of con LDP. The undeveloped brownfield regeneration allocations identified in the existin retained and supplemented with sustainable urban growth in settlements that demo service and transportation functions. This approach is essential to implement the long embodied within the Replacement LDP Vision. As such, the proposal to re-order the
	County Borough. However, the order in which the growth areas are listed for regeneration and sustainable development should reflect the settlement hierarchy in terms of scale, role and function as set out	flexibility (inclusive of the flexibility allowance) a minimum in order	The rationale for the Growth Strategy is detailed within the Strategic Growth Options support for the Growth Strategy is noted. An appropriate flexibility allowance (10%) h Deposit Plan and the basis for which is clearly set out in the Housing Trajectory Back allowance recognises the fact that there may be certain specific circumstances, un stage, that delay the delivery of sites, notwithstanding the robust frontloading of site

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 Wales and seeks to minimise ever, given the existing LDP's bly Bridgend and the Valleys aining. Additional viable and ement SP1, deliver affordable irements can be realised.

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

of which are greenfield. Each ment Methodology which was eport (2020)). During Stage 2 ney raised in terms of their essibility, physical character, pare and submit a number of and suitability. Proceeding this ration in the Deposit Plan.

vill be subject to site-specific oment principles (See Deposit 1 hectares of retained green on of enabling sensitive public ation will also be required to parate identities and character

eeks to continue to provide a f the Council, whilst balancing Growth Areas appear before ontinuity with the first adopted sting LDP are proposed to be nonstrate strong employment, ng-term regeneration strategy he growth areas within SP1 is

ns Background Paper and the ) has been embedded into the ckground Paper. The flexibility unknown at the plan making te delivery evidence. This is a

	in previous policy SF1: Settlement Hierarchy and Urban Management. This was previously done in the PS consultation document. It is acknowledged that Background Paper 2: Strategic Growth Options provides a refresh of evidence used to inform the housing provision underpinning the Replacement Bridgend Local Development Plan. This is considered appropriate in light of the latest population and household projections issued by Welsh Government which update the 2014 based equivalents. Whilst the long term outlook on births and deaths have been dampened the refreshed demographic evidence does not warrant a fundamental departure from the growth levels set out in the Preferred Strategy (PS). As previously stated in the PS, the mid- growth options which includes the delivery of 505 dwellings per annum is considered reasonable however it should be considered a minimum figure. As such, emerging Policy SP1 should be amended to state that the Plan will make provision for 'a minimum of 9,207 new homes to meet the housing requirement of 7,575 dwellings (based on 20% Flexibility Allowance), including 1,977 affordable new homes'. In order to deliver the growth strategy, Llanmoor supports the allocation of Land West of Bridgend SP2 (3) under Policy SP2: Regeneration Growth Areas and Sustainable Growth Area Strategic Allocations. Llanmoor have continued to work with the Council in providing robust technical and financial viability evidence to demonstrate the deliverability of the site. Further comments relative to the allocation of Land West of Bridgend SP2 (3) are made under the appropriate heading within these written representations.	to deliver the housing requirement. Supports allocation of Land West of Bridgend as a means of delivering the growth strategy.	large flexibility allowance, chosen specifically to enable the Replacement LDP's hou comfortably deliverable in the event that a strategic site fails to come forward as anti preparation. With a 10% flexibility allowance, the Anticipated Annual Build Rate (AA throughout the plan period even if a significant unforeseen scenario, such as non- should occur. As such, the proposal to set the total dwelling provision (inclusive of th minimum to deliver the dwelling requirement is not supported. The total level of h Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the flexibility allowance itself is not the minimum requirement, it has been set to ensure above the housing requirement to account for non-delivery and unforeseen issu Development Plans Manual.
610	Yes unless you're planning to provide an extra GP surgery and employ more nurses and GP's then the community will suffer	Concerns regarding provision of GP Surgeries	In relation to the provision of additional GP surgeries, the Council has been engaging University Health Board from the outset of the Replacement LDP process. Early me the level and spatial distribution of growth proposed was clarified to help facilitate alig As part of Stage 3 of the Candidate Site Assessment, the health board amongst othe invited to provide comments in respect of those sites identified as suitable for future

nousing requirement to remain anticipated at this point of plan AABR) will remain deliverable on-delivery of a strategic site, f the flexibility allowance) as a f housing provision within the the housing requirement. The ure there is sufficient flexibility ssues in accordance with the

cil has been engaging with Cwm Taf Morgannwg DP process. Early meetings were held to ensure d to help facilitate alignment of service provision. h board amongst other consultation bodies were as suitable for future development and possible

700	Agroo	Quenort	allocation in the Deposit LDP. Whilst the Council cannot ultimately control provides services, close working relationships will continue and be maintained with Cwm Health Board. This will be key to service provision planning as site allocations within Comments noted
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	We do not wish to comment specifically on the level of growth proposed as part of the strategy. It is, however, important that the role of diverse and attractive centres in achieving the growth strategy is recognised. Key centres must provide a mix of retail and leisure uses, whilst also realising opportunities for wider uses (for example, new residential and education related development). Doing so will help retain/attract skilled, economically active households within the County Borough. Policy SP1 states that the growth strategy will be enabled through the allocation of Mixed-Use Strategic Development Sites (SP2), Housing Sites (COM1) and Employment Sites (ENT1). Other policies within the Replacement LDP also provide an opportunity to contribute to the growth strategy. For example, the regeneration of the Southside area in Bridgend Town Centre through Policy ENT6.	No changes – attractive and diverse centres can help achieve growth strategy	Comments noted. In recognising that Town, District and Local Centres are moving away from their the SP12, and its supporting policies, seeks to ensure they become the focus of a wind facilities. The 'Town Centre First' approach is key to enabling such centres to functional places and community focal points, thereby rendering them more viable will complement efforts to regenerate retail and commercial centres through the creat the re-use of underutilised areas, the start-up of remote co-working hubs, and the public services. An Urban Capacity Study (UCS) (See Appendix 39) has been prepared in support which provides an analysis of the potential urban capacity of the County Borough's evidence the expected small and windfall site allowance rate. The UCS identifies more serves as a useful resource to developers and SMEs who are seeking to iden opportunities not specifically allocated in the Replacement LDP. The evidence identifies the level of capacity across the County Borough's settlements in both summarised in Table 10. Many of the sites and sources of urban capacity identified town and commercial centres, and together with the greater flexibility introduced into policies of the Replacement LDP, demonstrate scope to accommodate more resthese areas.
400	Jehu support the dual faceted approach taken by the Council in delivering a Regeneration and Sustainable Growth Strategy outlined in Policy SP1 as it prioritises the regeneration of underutilised land and delivers additional growth to existing settlements in a sustainable manner. Jehu support the provision of 9,207 new homes to meet the housing requirement of 7,575 dwellings (based on a 20% flexibility allowance). The housing requirements of 7,575 dwellings is considered a minimum a requirement for the RLDP. Specifically, Jehu support the identification of Maesteg and Llynfi Valley as a Regeneration Growth Area (RGA) as previously reflected in the PS. Jehu also support the growth and spatial strategy being informed by the Settlement Assessment (2019, updated in 2021) which	No changes proposed – support the Growth Strategy, Spatial Strategy and allocation of Land South East of Pont Rhyd-y- cyff (COM 1(3)).	Comments noted.

ovision of primary healthcare or Taf Morgannwg University hin the Deposit Plan progress.

r traditional retail roles, Policy wider variety of services and to increasingly become multible as go-to destinations. This reation of more outside space, the focus of more accessible

port of the Replacement LDP, gh's settlements for housing to some than sufficient capacity ponent of the housing supply. It identify potential development ace contained within the UCS oth numeric and spatial terms, fied in the Study are located in nto the Retail and Town Centre residential development within

287	identifies Maesteg and the Valleys Gateway as main settlements. It is noted that paragraph 4.3.19 of DCD states: "Whilst Maesteg and some surrounding parts of the Llynfi Valley would benefit from regeneration-led growth, it is acknowledged that some residential sites in this vicinity will require longer lead in times than others for delivery to take place. Therefore, the housing land supply will not be dependent on delivery of all regeneration sites in this area. Instead, it will be important to provide flexibility to explore a number of options to bring these sites forward over the life of the LDP, recognising the importance of facilitating development of new mixed use communities on brownfield land." Whilst Jehu consider it appropriate to provide flexibility to enable sites to come forward over the life of the LDP, Jehu confirm the land at east of Bridgend Road, Pont Rhyd-y-Cyff is deliverable in the short term and will come forward within the early stages of the RLDP period which will assist in delivering housing growth in accordance with the growth strategy. Support - please see covering letter submitted	No Changes proposed – support growth	Comments noted
	We are instructed, on behalf of our client	support growth strategy	
	and the site promoter – BPM Technology Corp Ltd – to submit this letter in response		
	to the Bridgend County Borough Local Development Plan 2018-2033 Deposit Plan		
	Consultation. In summary, these representations wish to provide overwhelming support for the Deposit Plan,		
	primarily in relation to Policy COM1 (Housing Allocations), which identifies Land South of Pont Rhyd-y-cyff (ref. COM1(4)) as		
	a housing allocation with capacity to provide 102 units in the plan period up to 2033.		
	Background		
	Regulation 18 of the Local Development Plan Regulations requires that, a person may make representations on deposit		
	proposals of Local Development Plan within		

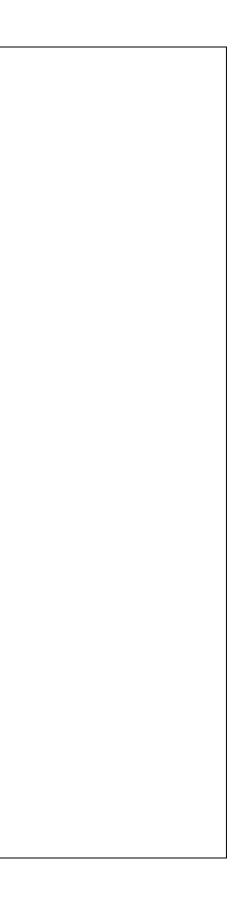


the period of 6 weeks on the day on which
the LPA publishes the Deposit Plan.

On 1st June 2021 Bridgend County Borough Council opened a consultation period inviting comments on the draft Deposit Plan, which closes at 5pm on 27th July 2021.

The deposit plan, and in particular Policy SP6 (Sustainable Housing Strategy) makes a 'provision for 9,207 dwellings within the Bridgend County Borough (incorporating a 1,632 dwelling over allocation / 20% flexibility allowance) to accommodate a housing requirement of 7,575 dwellings during the 15 year LDP period from 2018 to 2033'. The total annual build rate of 505 dwellings per annum proposed, of which 132 are affordable housing units, is based on a 6-year historical period (2013/4-2018/19) which witnessed sustainable population growth as well as completions across the County Borough.

In order to achieve this, the deposit plan proposes a mixture of strategic sites, housing allocations and long-term regeneration sites under Policy COM1 (Housing Allocations). All these allocations are set to deliver a minimum of 100 market units over the plan period, with some expected to deliver well beyond the plan period. Similarly, these allocations would also deliver between 15-300 affordable units within the plan period. Policy COM1 (Housing Allocations) sets out the sites which are allocated for residential development in the period up to 2033 in order to deliver the housing requirement set out by Policy SP6 (Sustainable Housing Strategy) and is set out in the illustrations below.



308	Llanmoor supports the Sustainable Growth Strategy outlined in Policy SP1 as it prioritises the delivery of additional growth to existing settlements in a sustainable manner allowing the County Borough to prosper. Llanmoor specifically supports the identification of Bridgend as a Sustainable Growth Area within Policy SP1 given its status as the Primary Key Settlement of the County Borough. However, the order in which the growth areas are listed for regeneration and sustainable development should reflect the settlement hierarchy in terms of scale, role and function as set out in previous policy SF1: Settlement Hierarchy and Urban Management as previously set out in the PS consultation document.		As detailed within the Spatial Options Background Paper, the Spatial Strategy seek land use framework that helps realise the regeneration aspirations and priorities of th the need to deliver future housing requirements up to 2033. Regeneration Gro Sustainable Growth Areas within SP1 to clearly highlight a necessary degree of cont LDP. The undeveloped brownfield regeneration allocations identified in the existing retained and supplemented with sustainable urban growth in settlements that demon service and transportation functions. This approach is essential to implement the long- embodied within the Replacement LDP Vision. As such, the proposal to re-order the not supported.
	It is acknowledged that Background Paper 2: Strategic Growth Options provides a refresh of evidence used to inform the housing provision underpinning the Replacement Bridgend Local Development Plan. This is considered appropriate in light of the latest population and household projections issued by Welsh Government which update the 2014 based equivalents. Whilst the long-term outlook on births and deaths have been dampened, the refreshed demographic evidence does not warrant a fundamental departure from the growth levels set out in the Preferred Strategy (PS). As previously stated to the PS, the mid-growth options which includes the delivery of 505 dwellings per annum is considered reasonable however it should be considered a minimum figure. As such, emerging Policy SP1 should be amended to state that the Plan will make provision for 'a minimum of 9,207 new homes to meet the housing requirement of 7,575 dwellings (based on 20% Flexibility Allowance), including 1,977 affordable new homes'.	word SP1 to make the dwelling provision (inclusive of the flexibility allowance) a minimum in order to deliver the housing requirement.	The rationale for the Growth Strategy is detailed within the Strategic Growth Options I support for the Growth Strategy is noted. An appropriate flexibility allowance (10%) ha Deposit Plan and the basis for which is clearly set out in the Housing Trajectory Backg allowance recognises the fact that there may be certain specific circumstances, un stage, that delay the delivery of sites, notwithstanding the robust frontloading of site of large flexibility allowance, chosen specifically to enable the Replacement LDP's hous comfortably deliverable in the event that a strategic site fails to come forward as antic preparation. With a 10% flexibility allowance, the Anticipated Annual Build Rate (AAI throughout the plan period even if a significant unforeseen scenario, such as non- should occur. As such, the proposal to set the total dwelling provision (inclusive of the minimum to deliver the dwelling requirement is not supported. The total level of ho Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the flexibility allowance itself is not the minimum requirement, it has been set to ensure above the housing requirement to account for non-delivery and unforeseen issue Development Plans Manual.

eeks to continue to provide a the Council, whilst balancing Frowth Areas appear before ontinuity with the first adopted ting LDP are proposed to be constrate strong employment, ng-term regeneration strategy he growth areas within SP1 is

has been embedded into the ckground Paper. The flexibility unknown at the plan making the delivery evidence. This is a ousing requirement to remain nticipated at this point of plan ABR) will remain deliverable on-delivery of a strategic site, the flexibility allowance) as a housing provision within the the housing requirement. The re there is sufficient flexibility sues in accordance with the

	In order to deliver the growth strategy, Llanmoor supports the allocation of Land West of Bridgend SP2 (3) under Policy SP2: Regeneration Growth Areas and Sustainable Growth Area Strategic Allocations. Llanmoor have continued to work with the Council in providing both technical and viability evidence to demonstrate the viability and deliverability of the site. Further comments relative to the allocation of Land West of Bridgend SP2 (3) are made under the appropriate heading within these written representations.	No proposed changes. Supports allocation of Land West of Bridgend as a means of delivering the growth strategy.	Comments noted.
400	Jehu support the dual faceted approach taken by the Council in delivering a Regeneration and Sustainable Growth Strategy outlined in Policy SP1 as it prioritises the regeneration of underutilised land and delivers additional growth to existing settlements in a sustainable manner. Jehu support the provision of 9,207 new homes to meet the housing requirement of 7,575 dwellings (based on a 20% flexibility allowance). The housing requirements of 7,575 dwellings is considered a minimum a requirement for the RLDP. Specifically, Jehu support the identification of Maesteg and Llynfi Valley as a Regeneration Growth Area (RGA) as previously reflected in the PS. Jehu also support the growth and spatial strategy being informed by the Settlement Assessment (2019, updated in 2021) which identifies Maesteg and the Valleys Gateway as main settlements. It is noted that paragraph 4.3.19 of DCD states: "Whilst Maesteg and some surrounding parts of the Llynfi Valley would benefit from regeneration-led growth, it is acknowledged that some residential sites in this vicinity will require longer lead in times than others for delivery to take place. Therefore, the housing land supply will not be dependent on delivery of all regeneration sites in this area. Instead, it will be important to provide flexibility to explore a number of options to bring these sites forward over the life of the LDP,		Comments noted (Refer to Growth Options Background Paper, Spatial Strategy Housing Trajectory Background Paper and Candidate Site Assessment).

gy Options Background Paper,

			-
10	recognising the importance of facilitating development of new mixed use communities on brownfield land." Whilst Jehu consider it appropriate to provide flexibility to enable sites to come forward over the life of the LDP, Jehu confirm the land at east of Bridgend Road, Pont Rhyd- y-Cyff is deliverable in the short term and will come forward within the early stages of the RLDP period which will assist in delivering housing growth in accordance with the growth strategy.	None – support	Comments noted (Refer to Growth Options Background Paper and Spatial Strategy 0
	approach taken by the Council in delivering a Regeneration and Sustainable Growth Strategy outlined in Policy SP1 as it prioritises the regeneration of underutilised land and delivers additional growth to existing settlements in a sustainable manner. The landowners support the provision of 9,207 new homes to meet the housing requirement of 7,575 dwellings (based on a 20% flexibility allowance). The housing requirements of 7,575 dwellings is considered a minimum a requirement for the RLDP. Specifically, the landowners support the identification of Bridgend as a Sustainable Growth Area within Policy SP1 given its status as the Primary Key Settlement of the County Borough. It is acknowledged that Background Paper 2: Strategic Growth Options provides a refresh of evidence used to inform the housing provision underpinning the Replacement Bridgend Local Development Plan. This is considered appropriate in light of the latest population and household projections issued by Welsh Government which update the 2014 based equivalents. Whilst the long term outlook on births and deaths have been dampened the refreshed demographic evidence does not warrant a fundamental departure from the growth levels set out in the Preferred Strategy (PS). As previously stated in the PS, the mid-growth options which includes the delivery of 505 dwellings per annum is considered a minimum figure.	None – support the Growth Strategy and Spatial Strategy	

y Options Background Paper).

	As such, emerging Policy SP1 should be amended to state that the Plan will make provision for 'a minimum of 9,207 new homes to meet the housing requirement of 7,575 dwellings (based on 20% Flexibility Allowance), including 1,977 affordable new homes'. In order to deliver the growth strategy, the landowners supports the identification of growth being focussed at Bridgend. The landowners agree that the Parc Afon Ewenni represents a significant mixed-use brownfield opportunity which together with Brocastle Estate and the former Ford site will collectively represent the Southern Bridgend Gateway. The landowners also agree that the mixed used regeneration at Parc Afon Ewenni will deliver a sustainable place making led development which does form a pivotal part of the RLDP's regeneration and sustainable growth strategy.	Proposal to re- word SP1 to make the dwelling provision (inclusive of the flexibility allowance) a minimum in order to deliver the housing requirement	Deposit Plan and the basis for which is clearly set out in the Housing Trajectory Back, allowance recognises the fact that there may be certain specific circumstances, un stage, that delay the delivery of sites, notwithstanding the robust frontloading of site large flexibility allowance, chosen specifically to enable the Replacement LDP's hou comfortably deliverable in the event that a strategic site fails to come forward as ant preparation. With a 10% flexibility allowance, the Anticipated Annual Build Rate (AA throughout the plan period even if a significant unforeseen scenario, such as non- should occur. As such, the proposal to set the total dwelling provision (inclusive of the minimum to deliver the dwelling requirement is not supported. The total level of h Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the flexibility allowance itself is not the minimum requirement, it has been set to ensure above the housing requirement to account for non-delivery and unforeseen issu Development Plans Manual.
253	The proposed level of housing growth in the Deposit Draft RLDP is broadly supported, as is the need to allow for a greater amount of flexibility in the total buffer (i.e. 20% of required growth), given the historic problem with delivering a number of the sites allocated within the adopted LDP. The identified housing requirement makes use of the most recent household population projections and recognises the need to encourage a more youthful, skilled population base to counter-balance the ageing population, which is supported. It is encouraging that the Council recognises the direct relationship between the provision of housing land and economic growth. This of level of growth should however be considered a starting point, and if it were to be any less, it is considered that it would undermine the Council's 'CARM' ambition to ensure that the County Borough is attractive for both employers and skilled, economically active households to expand within or move into and the Cardiff Capital City Region Deal.	General support of the growth strategy and housing requirement (as a minimum).	Comments noted (refer to Strategy Growth Options Background Paper).
170	The mid-level growth option lacks aspiration and proposes a growth level only 45 units above the average over the	Concern the growth strategy 'lacks aspiration'	The rationale behind the Growth Strategy is clearly documented within the Strategic C Paper and Employment Background Paper. These papers support and draw upon

Ins Background Paper and the b) has been embedded into the ckground Paper. The flexibility unknown at the plan making ite delivery evidence. This is a nousing requirement to remain anticipated at this point of plan AABR) will remain deliverable on-delivery of a strategic site, f the flexibility allowance) as a f housing provision within the the housing requirement. The ure there is sufficient flexibility sues in accordance with the

c Growth Options Background upon the evidence within the

	current plan period and 64 units below the highest rate of build achieved in the plan period. The desire of the plan to attract		Demographic Analysis and Forecasts Report (2019), Demographics Update Add Evidence Base Study (2019) and Economic Evidence Base Update (2021).
	skilled economically active households needs to be supported by the right quantity and mix of new private housing to provide accommodation for these new employees/residents. Creating jobs without the new homes will only result in increased travel movement in and out of the borough.		The Council agrees with part of the representor's statement, "creating jobs without the in increased travel movement in and out of the borough". Hence, the Replacement evaluated a comprehensive range of growth options and analysed the link between or change and the size and profile of the resultant resident labour force. This has ensure Strategy that is most appropriate to achieve an equilibrium between the number of remaining within and moving into the County Borough plus the number of employers remaining the same vicinity. However, the Council disagrees with the representor's state "lacks aspiration" in terms of past build rates.
			The detailed evaluation within the Strategic Growth Options Background Paper ju Strategy as the most appropriate to achieve a balanced and sustainable level of facilitate the continued transformation of the County Borough into a network of a communities that connect more widely with the region. It is considered optimal to enable the delivery of key infrastructure, secure affordable housing and improve con over-development. The analysis also demonstrates that the Growth Option is rea benchmarked against past delivery rates, whilst also being robustly grounded in p and migration trends. Indeed, whilst it is important to understand past delivery circumstances that influenced them, the evidence-based work underpinning delive provides certainty that this scale of growth is achievable. The annual average dwellin 450 dwellings over the entirety of the existing LDP period. Underpinning the Replace requirement of 505 dpa therefore represents a realistic and sustainable upturn in a rates compared to that witnessed during the existing LDP period. However, as de Strategic Growth Options Background Paper, the Replacement LDP's evidence base past build rates as the sole evidence base to quantify future employment and housin and detailed evidence base has been developed and evaluated to identify the sca necessary to deliver the Vision, Aims and Objectives.
1	165 <u>The unmet requirement for affordable</u> housing	Allocate Candidate Site	The LHMA 2021 drew upon a range of socioeconomic, demographic and property ma detailed insights into the mechanics of the local housing markets in accordance
	PPW11 recognises the importance of 'ensuring there is sufficient housing land available to meet the need for new private market and affordable housing'. Indeed, National Policy actively recognises how the delivery of market units can be	87.C1 - Land of Penprysg Road, Pencoed as a means of boosting affordable housing supply.	Guidance. This allowed the type of need in different Housing Market Areas (e.g. tend be calculated and extrapolated over the Replacement LDP period. The LHMA is evidence that has influenced the scale, type and location of growth within the Replace contrary to the representor's statement, it is inaccurate to claim that the need to "increased" since the 2019/20 LHMA, as each LHMA represents a snapshot at a point Welsh Government Guidance.
	synonymous with the delivery of much needed affordable homes via Section 106 agreements or commuted sums. The Local Housing Market Assessment (2021) calculated a total need of 5,134 affordable housing units from 2018-33. This calculation was enabled by considering the level of newly arising need balanced against the extant backlog of need and forthcoming supply. This assessment has identified an annual need for 451 affordable units during the five-year		As detailed within the Affordable Housing Background Paper, the scale of affordabl distribution thereof have been key considerations when determining the overall lever the Replacement LDP (see also to the Strategic Growth Options and Spatial Str Papers, respectively). The Plan's contribution to affordable housing provision has all through robust viability work (plan-wide and site-specific) to ensure formulation of policy thresholds and proportions. It also has to be recognised that the need identifies the scale of the affordability gap in the market and the LDP itself is not the only a mechanism to help address it. The LHMA itself clarifies that this headline need figure a delivery target or even the solution to the affordability issues within the County B the level of housing need within the County Borough, which the Council will seek to market interventions as far as practically deliverable. These complementary sources are not limited to, Social Housing Grant and other capital/revenue grant funded set.

## Addendum (2020), Economic

the new homes will only result nent LDP evidence base has n different levels of population ured development of a Growth of economically active people rs relocating and/or expanding atement that the growth option

justifies the chosen Growth of economic growth that will safe, healthy and inclusive to deliver economic growth, onnectivity without resulting in ealistic and deliverable when post-recession demographic ery rates and the contextual livery of the Growth Strategy ling completion rate has been lacement LDP with a dwelling average dwelling completion demonstrated throughout the base has not simply relied on sing land requirements. A rich cale of new jobs and homes

market data in order to provide nce with Welsh Government enure mix and house types) to a is a core piece of baseline lacement LDP. However, and d for affordable housing has point in time in accordance with

able housing need and spatial vel and location of housing in Strategy Options Background also been carefully analysed of viable affordable housing tified in the LHMA represents y affordable housing delivery jure should not be considered Borough. It instead indicates to address through a range of es of supply include, although schemes, Registered Social

assessment period, based on the		Landlord self-funded schemes, reconfiguration of existing stock, private sector lea
assumption that the existing backlog will		homelessness duties into the private rented sector and re-utilisation of empty prope
be cleared during these five years. A		
further annual need of 288 affordable units		As also detailed within the Affordable Housing Background Paper, the Replacement
has also been identified for the remaining		identified affordable housing target within the designated settlement boundaries in a
10 years of the LDP period. In comparison		principles. Promotion of significant levels of development in the countryside (afforda
with the 2019/20 Local Housing Market		not considered conducive to sustainable placemaking and will only be permi
Assessment which identified a need of 411		circumstances to meet a pressing housing need. Moreover, affordable housing
affordable units per annum over the next		exceptions to general housing provision by their very nature, are not specifically a
five years, this is an increase in the overall		these reasons, no further allowance has been made to incorporate affordable hou
affordable housing need for the County		sites as a component of affordable housing supply. The affordable housing cor
Borough. Within the Bridgend Deposit		expected to be purposely small in scale and exceptional in circumstance.
Plan Consultation, Strategic Objectives		
have been identified to reflect on key		The proposal to allocate Land of Penprysg Road, Pencoed (87.C1) as a means of
issues, align with national policy and to		supply is therefore not supported. The Candidate Site Assessment clearly states, "
ensure an appropriate balance between		on the periphery of Pencoed, which is identified as Sustainable Growth Area (as
the different elements of sustainability.		highway issues associated with the site in addition to education capacity issues in
The Deposit Plan has identified a need for		this size would further exacerbate without the ability of resolving them. Whilst the sus
9,207 new homes, including 1,977		credentials of the site are acknowledged, there are other more suitable sites that h
affordable homes (Policy SP1) over the		allocations in the Deposit Plan without the presence of such issues".
plan period 2018-2033. The proposed		
growth level of 505 dwellings per annum is		
based on a 6-year historical period		
(2013/14 – 2018/19) which witnessed		
sustainable population growth as well as		
completions across the County Borough.		
In comparison with the LHMA, this		
identified need of 1,977 homes falls		
exceedingly short of the 5,134 affordable		
needs identified by the LHMA. Although		
this figure is not a target for delivery, it is		
an indication of the scale of the unmet		
need of affordable housing within the		
County Borough. In order for the LPA to		
meet the identified affordable housing		
need, more sites are needing to be		
allocated to cater for this shortfall, as well		
as allow for a flexible approach for		
affordable housing delivery on exception		
sites. PPW 11 and the Deposit Plan to-		
date recognises the importance of		
'ensuring there is sufficient housing land		
available to meet the need for new private		
market and affordable housing'. Indeed,		
National Policy actively recognises how		
the delivery of market units can be		
synonymous with the delivery of much needed affordable homes via Section 106		
agreements or commuted sums. As a		
result of this, Candidate Site 87.C1 - Land		

easing schemes, discharge of perties.

ent LDP will seek to deliver the n accordance with placemaking rdable housing or otherwise) is mitted in limited, exceptional ng exception sites, which are allocated within the Plan. For nousing delivered on exception contribution from this policy is

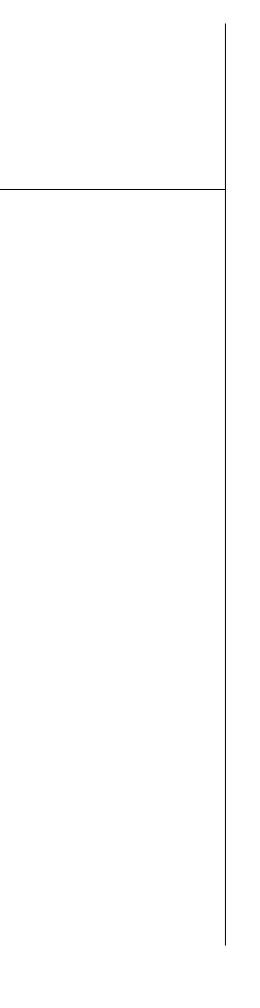
of boosting affordable housing s, "the candidate site is located as defined by SP1). There are s in the area whereby a site of sustainability and place making t have been carried forward as

	of Penprysg Road, Pencoed is a perfect candidate to provide a quantum of housing, in a shorter trajectory that others (and that of Land East of Pencoed), in a sustainable location – where the market acknowledges there is a huge demand for new housing.		
222	Bellway supports the approach taken by the Council in delivering a Regeneration and Sustainable Growth Strategy outlined in Policy SP1 as it delivers additional growth to existing settlements in a sustainable manner allowing the County to prosper. Bellway supports the identification of North Cornelly as part of the Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area (SGA).	Support the growth strategy and the designation of Pyle, Kenfig Hill and North Cornelly as Sustainable Growth Area.	Comments noted.
	However, the order in which the growth areas are listed for regeneration and sustainable development should reflect the settlement hierarchy in terms of scale, role and function as set out in Policy SF1: Settlement Hierarchy and Urban Management. This was previously done in the PS consultation document. Bellway supports the findings of the Settlement Assessment in terms of the grouped settlements of Pyle/ Kenfig Hill/North Cornelly being identified as a main settlement. The Full Sustainability Appraisal of the Deposit Plan confirms that SGAs include settlements most conductive to logical expansion through delivery of under-utilised sites within their functional area / on their periphery.	Supports the Settlement Hierarchy, Proposes as re- ordering the growth areas within SP1.	As detailed within the Spatial Options Background Paper, the Spatial Strategy see land use framework that helps realise the regeneration aspirations and priorities of the the need to deliver future housing requirements up to 2033. Regeneration Groups Sustainable Growth Areas within SP1 to clearly highlight a necessary degree of con LDP. The undeveloped brownfield regeneration allocations identified in the existin retained and supplemented with sustainable urban growth in settlements that demo service and transportation functions. This approach is essential to implement the long embodied within the Replacement LDP Vision. As such, the proposal to re-order the not supported.
	In this context, Bellway consider land at Heol Fach as a logical location for expansion on the periphery of North Cornelly and recommend the site should be allocated in the final RLDP. Bellway supports the identification of Pyle, Kenfig Hill and North Cornelly as a main settlement and consider the allocation of land at Heol Fach would assist in maintaining the settlements role and function as a main settlement. In order to deliver the growth strategy, Bellway strongly recommends land at Heol Fach should be allocated for residential	Propose allocating Land at Heol Fach, North Cornelly (Candidate Site 222.C1)	As stated in the Candidate Site Assessment (2022), "The candidate site is located Cornelly which is identified as a Sustainable Growth Area (as defined by SP1). The Active Travel network which will help foster and promote transit-oriented developme be free of any significant constraints. As such this site is allocated for residential deve LDP". However, whilst the Candidate Site Assessment concludes by stating that s with the LDP strategy and has passed all tests of assessment, members of Cabine is not required for allocation as they deem a 10% flexibility allowance is sufficient.

seeks to continue to provide a of the Council, whilst balancing Growth Areas appear before continuity with the first adopted isting LDP are proposed to be monstrate strong employment, ong-term regeneration strategy the growth areas within SP1 is

ted on the periphery on North The site is well serviced by the ment. The site is considered to velopment in the Replacement at site is considered to accord met have decided that this site

070	development as the site is capable of being delivered in the first phase of the RLDP period which will strengthen its main settlement role and function whilst delivering the growth strategy identified in the RLDP. Further comments relative to the allocation of land at Heol Fach are made under the appropriate heading within these written representations.		
273	The Preferred Strategy Approach to	No changes being	Comments noted.
	Housing Delivery	sought.	
	The Preferred Strategy consultation document identified an approach which consisted of allocating a series of larger, medium and small sites to deliver the identified housing need. It was proposed that these would have been supported by a higher than average allowance for windfall sites. The PS identified that sites of around 1000 homes could deliver the infrastructure needed to accommodate the population resulting from those sites. It then proposed that sites of 150 dwellings or less would also contribute towards housing delivery, but that were small enough so as not to result in a significant impact on local infrastructure, except for some localised improvements. Finally, small extensions to settlement boundaries would provide opportunities for smaller sites to come forward. Such an approach was generally supported by us, with a caveat that greater emphasis ought to be placed on the small to medium size sites given their ability to deliver relatively quickly, often without large upfront capital investment, and can therefore make a significant cumulative contribution to overall annual housing completions. Thereby helping to supplement the increasing rates of housing delivery on large sites. Our position was that the Authority's proposal to allocate 'Edge of Settlement' was correct and should form a substantive proportion of the housing allowance.		
	Deposit BRI DP Approach to Housing	No changes being	Comments noted.
	Deposit BRLDP Approach to Housing Delivery Summary of the Approach	sought.	
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The Deposit BRLDP's approach to housing delivery does in many ways reflect that of the Preferred Strategy. Larger Strategic Sites are identified to deliver the bulk of the housing need, with a minimal number of medium size sites of 150 or less included. All such sites are identified as delivering units from Year 6 onwards. These are accompanied in Year 6 and onwards by some existing land bank (albeit with dwindling numbers over the plan period), large windfall sites (a provision of 44 per annum) and small sites (provision of 62 per annum) In the early stages (Years 1 to 5), the Plan identifies existing planning permissions as the only source of housing delivery and the trajectory acknowledges a 'dip' in delivery over these years. Delivery begins to increase again as the housing allocations come 'online' from year 6 onwards (see Table 3 below extracted from the Housing Trajectory background paper) - refer to Table 3 in DPP representation.

## <u>Comments on the Approach – Large</u> <u>Strategic Sites</u>

Many of the housing allocations within the emerging LDP, both strategic and nonstrategic are large and complex sites. These sites often involve multiple landowners with differing interest and reaching agreements on timescales with the LPA can be a protracted task. Such issues have already been experienced by BCBC on the larger sites under the existing LDP. For example, Parc Derwen was allocated for 1,500 homes and was originally granted planning permission in outline in 2007 with the original submission having been made in 2000. It therefore took 7 years to gain outline planning permission. The development remains unfinished, with planning permission only recently having been granted for the various play areas on the site - some 20 years after the original planning application was submitted. In addition, the

Concerns regarding 'overreliance' on strategic sites and proposal to reapportion growth across a mix of small, medium and large sites. The Strategy seeks to deliver several large-scale Sustainable Urban Extensions, which is necessary to create sustainable communities that will incorporate a mix of complementary uses and deliver improvements to existing infrastructure and/or provide new supporting infrastructure. Indeed, this latter factor is particularly notable given the school capacity issues across the 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. Sustainable Urban Extension sites have been proposed for allocation where they can best support the Replacement LDP Vision and Objectives and are capable of delivering mixed use development at a scale that will enhance communities.

Identification of appropriate Sustainable Urban Extensions has been undertaken in accordance with the Site Search Sequence and other requirements set out in Planning Policy Wales, as documented in supporting evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy Options Background Paper, Housing Trajectory Background Paper and Minimising the Loss of BMV Agricultural Land Background Paper. The rationale for the proposed allocations within the Deposit Plan is clearly outlined in the Candidate Site Assessment.

Whilst the representor cites potential delays with larger strategic sites, with heavy reference to Cardiff's LDP, this fails to recognise the level of 'frontloading' conducted by site promoters prior to publication of Bridgend's Deposit Plan. Without exception, all proposed sites are supported by a large body of technical evidence to demonstrate their deliverability and viability. The total housing provision, and spatial distribution thereof, has also been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the

one of the Council's proposed sites within the Deposit BRLDP, Parc Afon Ewenni was allocated within the adopted LDP and identified as starting to deliver on its 550 dwellings in 2011. We are now 10 years on from that point and not a single application has been submitted. There have been issues with ownership and site specific matters relating to contamination. The issues identified above are not only an issue for Bridgend, it is noted that Cardiff Council's approach in their adopted LDP was to allocate a number of large strategic sites in an attempt to deliver the required housing need. Cardiff is at the early stages of its Review, however, they recognise that their approach will need to change to ensure that the required number of completions in the early years of the plan can be delivered.

Paragraphs 2.54 and 2.55 of Cardiff Council's LDP Review Report1 state:

Although these rates are below targets set out in the AMR it is now evident that the Plan-led approach is now starting to successfully drive the delivery of new homes at a level not seen for the last 10 years. The 1,444 completions in 2018/19 (43% higher than 2017/18) contrast with the previous 9 years where completions averaged 725 units per annum, with no year above 1,000 units for this period.

The data on housing deliverv demonstrates the 'lag' between Plan adoption and homes being completed on new sites allocated in the Plan. Due to a combination of site assembly, legal and logistical factors experienced by landowners/developers along with the time required to secure the necessary planning and adoption consents, trajectories of delivery are slower than originally anticipated. This includes time spent securing the accompanying Section 106 Agreements which fully deliver the Council's aspirations as set out in the LDP. Overall, over the 13 years between 2006 completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting.

In addition, an appropriate flexibility allowance (10%) has been embedded into the Deposit Plan and the basis for which is clearly set out in the Housing Trajectory Background Paper. The flexibility allowance recognises the fact that there may be certain specific circumstances, unknown at the plan making stage, that delay the delivery of sites, notwithstanding the robust frontloading of site delivery evidence. This is a large flexibility allowance, chosen specifically to enable the Replacement LDP's housing requirement to remain comfortably deliverable in the event that a strategic site fails to come forward as anticipated at this point of plan preparation. With a 10% flexibility allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur.

The proposal to re-apportion growth away from the proposed strategic sites and to place a greater reliance on a mix of small, medim and large sites is not supported. Several sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infratructure problems and it can be more difficult for such sites to provide their own supporting infrastructure until they reach sufficient critical mass. As noted in the Plan-Wide Viability Appraisal, sites of several hundred units can pose their own viability issues for this very reason. Therefore, the Deposit Plan has only proposed site allocations where capacity was clearly demonstrated to accommodate the respective level of growth within the settlement and/or necessary facilities and infrastructure improvements could be provided in support of the development. The final selection of proposed allocations, and accompanying justification, is provided in the Candidate Site Assessment.

and 2019 a total of 16,521 new dwellings were built in Cardiff which represents 40% of the overall dwelling requirement.

This is also recognised on page 9 of Cardiff's 'Consultation Paper on Draft Vision, Issues and Objectives'2 . It is noteworthy that the brief recognition of this issue within the document also recognises that this isn't just an issue for the Cardiff's administrative area, but it is an issue across the UK. Cardiff's approach is therefore likely to reflect the issues experienced in the first 10 years of the plan and will involve a mixture of larger and smaller sites that can deliver housing at a more consistent level.

Whilst it is recognised that Cardiff and Bridgend are different in terms of housing need, geography, population projections etc., the fact remains that larger strategic sites can be very slow in delivering the housing needed.

As highlighted above the approach adopted within the BCBC Deposit RLDP places a significant amount of emphasis on the larger sites, however, it does recognise that these would be delivered around Year 6 and beyond of the 15 year Plan. At Year 8 (2025 - 2026), the Trajectory indicates that the Strategic sites would be delivering 600+ homes. This is only 3 to 4 years away. Many of these sites will require substantial work in putting Environmental together Impact Assessments which could take 6-12 months or more to pull together. After which an outline application would need to be submitted and approved. Based on the experience in Cardiff, this is a process which will take far longer than the statutory determination period for a major application. Some would likely take up to 12 months to reach a resolution to grant planning permission before having to go through the process of signing a S106 Agreement; a process that can take 6 months or more in many cases. By which

time we are already into Year 7 or 8 of the Plan with no reserved matters applications having been submitted. Based on the current trajectory, a year later, the Strategic sites would be delivering 600+ completions.

It is noteworthy that in the first 10 year period of the Cardiff LDP only 40% of the expected housing from large strategic allocations were delivered. The reliance therefore within the BCBC Deposit RLDP on the housing identified in year 6 and beyond being delivered in this period is highly questionable; particularly given we are now into year 4 of the Plan and the Plan has not yet been through its examination. Whilst some work may be going on in the background to prepare applications for these sites, no such applications have been submitted to-date: and given the changes to national policies in respect of TAN1 and the weight given to a lack of housing supply, such speculative or 'premature' applications are less likely to be submitted.

Whilst the approach of including some larger strategic sites is supported, it is considered that a more realistic timetable is utilised for their delivery against the trajectory and over-reliance on such sites for effective housing delivery should be avoided by spreading allocations across a mix of small, medium and large sites.

<u>Comments on the Approach – Windfall</u> <u>Sites and Existing Permissions</u>

The early years of the Plan and Housing Trajectory places significant reliance on existing planning permissions, with windfall sites beginning to make a contribution during Year 6. It is anticipated that some 440 dwellings would be delivered through this approach. This is a large number of housing that is unallocated and is subject to sites becoming available, market fluctuations and land availability.

Concern regarding the windfall and small site allowance Edition 3 of the Development Plans Manual stresses the importance of small and large site windfall rates as separate components of housing supply and states "reviewing windfall delivery rates for both small and large sites, over different time periods, will shape the consideration of a future extrapolation rate". The Manual also cautions against using abnormal trends for this purpose and suggests "the time period chosen should be sufficient to rule out anomalies in specific years and be of a reasonable duration". Indeed, it is important for the future extrapolation rate to be based on a balanced rate of completions to avoid being skewed by particularly high or low trends. Therefore, the fifteen-year average over the whole existing LDP period (2006/07 to 2020/21) is considered the most robust for this purpose as this period encompasses the recession, the subsequent repercussions and the following years of economic recovery. This is especially given the fact that the Replacement LDP seeks to broadly continue with the existing LDP's Regeneration-Led Strategy (along with some additional sustainable growth) and also maintain similar settlement boundaries. An Urban Capacity Study

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The approach taken by the Council of averaging out the completions over the last 15 years is understandable, however, the significant fluctuations in the delivery of windfall sites is a concern particularly given the Welsh Government's Development Plan Manual's requirement to act on any shortfall where the under- delivery is identified over a two year period.		(UCS, 2020) was published alongside the Deposit Plan to provide further analysis of the of the County Boroughs' settlements for housing to evidence the expected small and we This UCS identifies more than sufficient capacity within the proposed settlement boom this particular component of housing supply. It therefore demonstrates (in addition to and windfall site allowance rate utilised in the Replacement LDP is both realistic and as a useful resource to developers and SMEs who are seeking to identify potential of not specifically allocated in the Replacement LDP. The representor's concerns are and not supported. Moreover, the housing trajectory will be reviewed as the plan programmeter of the Replacement LDP. Refer to the Housing Trajectory Back
The below extract from the Housing Trajectory background paper demonstrates the fluctuations and therefore the uncertainty around delivery of such sites: Whilst it is acknowledged that this includes a period of recession, even in post- recession times the numbers fluctuate from 98 in one year to 0 in another. Whilst in this particular example over a two year period of monitoring this would be above the 44 average for windfall sites, taking other years with a delivery of 0 and 32 would result in a significant under supply which could trigger the need to start reviewing the delivery of housing against the trajectory.		
Comments on the Approach for the Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area Kenfig Hill is designated as a 'Main Settlement' under Policy SF1 of the DBRLDP given their strong employment function along with a good variety of shopping and community services that cater for its hinterland and surrounding areas. Accessibility to the M4 along with access to train connections make the Area a key area for growth. In recognition of this, it is identified as a 'Sustainable Growth Area' which is outlined in the BRLDP as an area "which include those settlements that are most conducive to logical expansion through delivery of under-utilised sites within their functional area and/or on their periphery to	inconsistencies between Table 6 and PLA5	Table 6 is not intended to match PLA5 and, as such, the representor's statement is f 6 documents the total housing provision by Settlement, akin to the total documented the contribution identified from the Land East of Pyle site as referenced in PLA5 and supply components as clearly stated in supporting paragraph 4.3.50. This will calcordance with the housing trajectory as the plan progresses.

of the potential urban capacity d windfall site allowance rate. boundaries to accommodate to past trends) that the small nd deliverable. It also serves al development opportunities ire therefore unsubstantiated progresses and as part of the ackground Paper and UCS.

is factually inaccurate. Table ted in Table 7. This includes along with all other housing continue to be updated in

encourage transit orientated development." Accordingly, a significant amount of housing is proposed to be allocated here – some 2000 homes. There are, however, some <u>discrepancies</u> within the document as to how many is proposed to be delivered under the allocation. <u>Table 6</u> on page 53 indicates that some 1,190 dwellings would be delivered over the plan period, however, on page 78 under PLA5 the details provided indicate that some 1,057 would be delivered (352 between 2023 and 2027 and a further 705 between 2028 and 2033). Notwithstanding this inconsistency, all of the proposed housing allocation for this Sustainable Growth Area is allocated on a single site. This enables the delivery of additional infrastructure, including 15% affordable housing, a two form entry primary school, 8ha of recreational facilities and new active travel routes. It is acknowledged that a mass of housing is required to deliver this infrastructure, however, given the area is identified as a sustainable growth area and given the pressing need for housing it is considered that a smaller number of dwellings could deliver on the same level of infrastructure and be accompanied by a selection of smaller or medium sites that could deliver on the housing numbers much quicker than a large strategic site like this.	Proposal for a smaller number of dwellings to deliver on the same level at Land East of Pyle and be accompanied by a selection of smaller or medium site	The components of housing supply for Pyle, Kenfig Hill and North Cornelly are de the majority of growth in the Replacement LDP period is indeed proposed for alloc as documented in the Candidate Site Assessment, the Land East of Pyle s demonstrated delivery in accordance with the requirements set out in the Developme plethora of evidence has been provided to the Council to demonstrate site deliverabi investigations and appraisals, masterplans, a viability assessment, a transg consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary t communities. All landowners are committed to working towards ensuring a dev delivered as a comprehensive development. Whilst the representor has stated "a selection of smaller or medium sites that co numbers much quicker than a large strategic site like this", no supporting evide corroborate this statement or indeed demonstrate that a collective number of sites of supporting infrastructure as Land East of Pyle. Therefore, this proposal is not s has only proposed site allocations where capacity was clearly demonstrated to a level of growth within the settlement and/or necessary facilities and infrastructur provided in support of the development. The final selection of proposed alloc justification, is provided in the Candidate Site Assessment.
RecommendationIt is noteworthy that within the PreferredStrategy emphasis was placed on thedelivery of dwellings through a mixture oflarge, medium and smaller sites.Such an approach was supported but hasnot materialised within the Deposit Planwhere a much greater emphasis has been	Concern that the Deposit Plan is over dependent on strategic sites	The Preferred Strategy identified a range of potential types of sites that could deli Strategy. These included Regeneration Sites, Sustainable Urban Extensions, Ed Local Settlement Sites. The Council has taken into account the full SA site asse Appendix G of the Sustainability Appraisal, to select an appropriate suite of pro- infrastructure proposals to meet identified needs. Informed by this SA Report, the confirms and provides reasoned justification for the outcome of the site selection candidate site. The Deposit Plan has only proposed site allocations where capacity accommodate the respective level of growth within the settlement and/or necessary

detailed within Table 7. Whilst location on Land East of Pyle, e site promoter has robustly ment Plans Manual. A detailed ability, including numerous site nsport assessment and due as provided a high degree of ra of associated development to deliver high-quality new development site that can be

could deliver on the housing idence has been provided to as could deliver the same level t supported. The Deposit Plan accommodate the respective cture improvements could be locations, and accompanying

eliver the Growth and Spatial Edge of Settlement Sites and sessment findings detailed in proposed site allocations and e Candidate Site Assessment on process in respect of each by was clearly demonstrated to ary facilities and infrastructure placed on the larger strategic sites, along with only a small selection of medium sized sites.

No allocations are made within the Plan for edge of settlement sites in the Pyle, Kenfig Hill and North Cornelly sustainable growth area that are capable of being delivered under a single full application rather than an outline followed by a Reserved Matters. Such sites are capable of being delivered within a short to medium timeframe and would support some of the medium sites to deliver the housing numbers whilst the larger sites are being taken through the protracted planning application process.

A number of such proposals were put forward as part of the Candidate site submissions, including that at Waun Bant Road, Kenfig Hill on behalf of Edenstone Homes. Further discussion of this site's suitability, adherence to the overall Strategy and response to the reasons for not including it is provided below, however, this proposal would provide immediate delivery for the LDP on a site which is void of any significant constraint, has good access to active travel network, and is well related to the existing built form.

It is therefore considered that whilst the overall approach does have some merit, there are some grave concerns about the early years of the Plan and its ability to deliver on the numbers, given the delays that are inevitably going to occur for the larger strategic sites, along with the unknowns and fluctuations in the delivery of windfall sites. Such concerns would therefore indicate that the plan is un-sound under Test 3 – Delivery in that there are question marks over the timing of the delivery of these sites along with the lack of appropriate contingency to deal with the likely slippage in delivery of larger Strategic sites. 221 Plan Period

improvements could be provided in support of the development. The final selection of proposed allocations, and accompanying justification, is provided in the Candidate Site Assessment.

The Strategy seeks to deliver several large-scale Sustainable Urban Extensions, which is necessary to create sustainable communities that will incorporate a mix of complementary uses and deliver improvements to existing infrastructure and/or provide new supporting infrastructure. Indeed, this latter factor is particularly notable given the school capacity issues across the 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. Sustainable Urban Extension sites have been proposed for allocation where they can best support the Replacement LDP Vision and Objectives and are capable of delivering mixed use development at a scale that will enhance communities.

Identification of appropriate Sustainable Urban Extensions has been undertaken in accordance with the Site Search Sequence and other requirements set out in Planning Policy Wales, as documented in supporting evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy Options Background Paper, Housing Trajectory Background Paper and Minimising the Loss of BMV Agricultural Land Background Paper. The rationale for the proposed allocations within the Deposit Plan is clearly outlined in the Candidate Site Assessment. Without exception, all proposed sites are supported by a large body of technical and viability evidence to demonstrate their deliverability.

The total housing provision, and spatial distribution thereof, has also been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting.

In addition, an appropriate flexibility allowance (10%) has been embedded into the Deposit Plan and the basis for which is clearly set out in the Housing Trajectory Background Paper. The flexibility allowance recognises the fact that there may be certain specific circumstances, unknown at the plan making stage, that delay the delivery of sites, notwithstanding the robust frontloading of site delivery evidence. This is a large flexibility allowance, chosen specifically to enable the Replacement LDP's housing requirement to remain comfortably deliverable in the event that a strategic site fails to come forward as anticipated at this point of plan preparation. With a 10% flexibility allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur.

The proposal to re-apportion growth away from the proposed strategic sites and to place a greater reliance on a mix of small, medim and large sites is not supported. Several sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infratructure problems and it can be more difficult for such sites to provide their own supporting infrastructure until they reach sufficient critical mass. As noted in the Plan-Wide Viability Appraisal, sites of several hundred units can pose their own viability issues for this very reason. Therefore, the Deposit Plan has only proposed site allocations where capacity was clearly demonstrated to accommodate the respective level of growth within the settlement and/or necessary facilities and infrastructure improvements could be provided in support of the development..

Plan PeriodProposal to alterProposal to alterProposal not supported. The Replacement LDP uses a conventional 15-year plan period and is being preparedPersimmon Homes West Wales raisethe plan period to<br/>15 to 20 yearsin accordance with the Replacement Delivery Agreement. The sites proposed for allocation, and the

Γ	that if adopted in the March / April 2022 as	from the point of	accompanying justification, is provided in the Candidate Site Assessment Report.	
	targeted by the Delivery Agreement (which is likewise now deemed questionable), the Plan will effectively only cover a relatively short Plan Period of 11 years. It is considered a more proactive approach would be to Plan for a 15 to 20-year period from the point of adoption, to allow for greater certainty over the longer-term and to align the Plan with Future Wales: the National Plan (2040). Such an approach would call for the allocation of additional sites to meet the housing need for the extended Plan Period.	adoption and allocate additional	clearly documented in the Housing Trajectory Background Paper.	
	Soundness: The Deposit Plan as currently drafted fails Test 1 and 3 in terms of the current Plan Period, with regard to the effectiveness of the Plan Period and the need to 'fit' with other plans and policies.			
	Recommendation: A 15-year Plan Period from the anticipated point of adoption (i.e. 2022) should be implemented and additional residential site allocations (including Broadlands, Coychurch and Zig Zag Lane) which are available and deliverable should be allocated to meet housing need in the short to medium term within the early plan years.			
	Timeframes	and request further supporting	Informed by the Sustainability Appraisal Report, the Candidate Site Assessment proposit Plan confirms and provides reasoned justification for the outcome of the site of each candidate site.	
	Deposit Plan Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1 set out the residential site allocations intended to deliver the housing developments up to 2033 and beyond. The Deposit Plan is reliant on five strategic sites (comprising 770 to 1,057 homes) and	evidence to verify the housing trajectory, make this available for public scrutiny prior to the submission of the Deposit Plan for examination and	the housing trajectory, make this available for public scrutiny prior to the submission of the Deposit Plan for	Whilst the representor cites potential delays with larger strategic sites, this fails 'frontloading' conducted by site promoters prior to publication of Bridgend's Deposit proposed sites are supported by a large body of technical evidence to demonstrative viability. The Replacement LDP has only proposed site allocations where capacity we accommodate the respective level of growth within the settlement and/or necessary improvements could be provided in support of the development. The final selection of accompanying justification, is provided in the Candidate Site Assessment.
	five large housing allocations (comprising 102 to 675 homes). No smaller residential site allocations below 100 dwellings are proposed in the Deposit Plan. The removal of the 5-year housing land supply policy within PPW 11 and TAN 1 and the replacement with the housing trajectory	allocate additional developer-led residential sites.	In addition, an appropriate flexibility allowance (10%) has been embedded into the for which is clearly set out in the Housing Trajectory Background Paper. The flexibilit fact that there may be certain specific circumstances, unknown at the plan making st of sites, notwithstanding the robust frontloading of site delivery evidence. This is a chosen specifically to enable the Replacement LDP's housing requirement to remain the event that a strategic site fails to come forward as anticipated at this point of planet.	

. The delivery timescales are

t published to accompany the te selection process in respect

ails to recognise the level of sit Plan. Without exception, all instrate their deliverability and by was clearly demonstrated to ary facilities and infrastructure on of proposed allocations, and

ne Deposit Plan and the basis bility allowance recognises the g stage, that delay the delivery s a large flexibility allowance, nain comfortably deliverable in plan preparation. With a 10% approach to monitor the delivery of LDP housing requirements (as part of LDP Annual Monitoring Reports), places even greater importance on ensuring that the housing trajectory is credible and realistic at the time at which the Plan is adopted. The Housing Trajectory 2018-2033 set out at Appendix 1 of the Deposit Plan provides an overview of the expected scale, composition and timing of housing allocations in the County Borough over the Plan Period and suggests the following:

• No new homes are planned for the first 5 years of the Plan Period (i.e. prior to Plan adoption in March / April 2022). During these years, the Council relies solely on the delivery of the land-bank of sites with existing planning permissions and opts not to allocate sites able to deliver new dwellings during this period;

• 35.3% of homes are subsequently planned for 2023 to 2028 (years 6 to 10), with most of the delivery expected to take place between 2029 to 2033 (years 11 to 16) (at 48.7%) and beyond the Plan Period (at 16.0%)

• Notwithstanding that in 2023/24 (year 6) homes are scheduled to begin to be delivered, the planned delivery rate is thereafter expected to be slow: o 2023/24 (Year 6) – 0.3% / 20 dwellings o 2024/25 (Year 7) – 3.9% / 265 dwellings o 2025/26 (Year 8) – 9.0% / 605 dwellings o 2026/27 (Year 9) – 11.1% / 751 dwellings o 2027/28 (Year 10) – 11.0% / 741 dwellings In terms of delivery of housing sites, PPW 11 paragraph 4.2.10 states:

The supply of land to meet the housing requirement proposed in a development plan must be deliverable" (Tetra Tech emphasis). The paragraph continues to state that: "To be 'deliverable', sites must be free, or readily freed, from planning, physical and ownership constraints and be economically viable at the point in the trajectory when they are due to come forward for development, in order to support the creation of sustainable flexibility allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur.

The total housing provision, and spatial distribution thereof, has been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting (20/04/2021). As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting. It must be noted that Persimmon Homes West Wales took part in the Stakeholder Group Meeting and did not cite any concerns regarding the housing trajectory during the meeting itself or following the Council's request for additional comments (stakeholders were advised that written representations would be accepted by 27<sup>th</sup> April 2021, a week following the meeting). It is therefore questionable why such concerns were not raised during the Stakeholder Group Meeting and why they have now been submitted in response to the Deposit Plan Consultation. Moreover, these latter submitted comments (that claim the delivery timescales of certain sites within trajectory are based on 'unrealistic and unreasonable assumptions') are considered to be unsubstantiated. The proposals are therefore not supported by the Council.

Further to this, an additional Stakeholder Group Meeting was held on 27th May 2022. The representor (Persimmon) attended the meeting and did not cite any concerns or objections regarding the housing trajectory. Therefore, it has been subject to further public scrutiny and there are considered to be no outstanding matters of dispute.

communities" (Tetra Tech emphasis) Whilst Persimmon Homes West Wales do not dispute the residential sites proposed to be allocated within Policy COM1 (with the exception of the 'roll-over sites' as discussed further in the following section and associated candidate site specific representations), the delivery timeframes for some of the proposed residential site allocations are questioned.

The County Borough's trajectory makes the assumption that all residential site allocations, with the exception of Land South of Pont Rhyd-y-cyff will benefit from planning permission and will have discharged all pre-commencement conditions to enable units to be delivered on site by 2025/26. Tetra Tech Planning consider this to be an unrealistic and unreasonable assumption for some of these sites, particularly when considering the complexities associated with delivering the strategic allocations and/or roll-over sites. At the time of the submission of these representations, no planning applications have been submitted. Especially with regard to the Porthcawl Waterfront and Parc Afon Ewenni sites, if there were indeed no barriers to delivery, the planning applications to deliver new homes on these sites would have realistically been made by now. The practicality of the delivery timeframes has likewise previously been questioned as part of the Bridgend Housing Trajectory Stakeholder Group Meeting, with Strategic Planning Policy at Appendix 1 of the Housing Background Paper requesting that; "...the Group to submit further representations on this point if anyone felt the timescales were unrealistic"

Whilst it is accepted that the Council is likely to have relied upon the delivery trajectory figures from the information provided within the site-promoters candidate sites submissions, it is felt that some of these trajectories are over optimistic, albeit this is somewhat

unsurprising given the lack of representative house builder input into the sites considered over-ambitious. Paragraph 4.13 of the Bridgend Housing Trajectory Stakeholder Group Meeting Note (20/04/2021) indicates that Bridgend Strategic Planning Policy officers state: "that the purpose of the trajectory is to factor in such delivery issues and timescales involved in procuring a developer, obtaining planning permission, marketing the site etc. The draft trajectory has been formulated on this basis by discussing such deliverability issues with each site promoter in the first instance. The trajectory will morph accordingly through the plan preparation process, although the initial trajectory is based on what has been demonstrated so far and what is considered realistically deliverable". It is considered essential that the housing trajectories for all proposed site allocations are revisited and evidence provided to robustly demonstrate that these housing delivery trajectories are realistic based on: 1. Realistic planning application preparation lead-in timeframes (longer if the site requires design / development briefs) 2. Environmental Impact Assessment ("EIA") Screening / Scoping requirements (potentially for strategic site allocations); 3. Pre-application / Statutory Pre-Application Consultation requirements: 4. Planning application submission and determination by the Local Planning Authority (based on representative schemes elsewhere in the County Borough). Extended timescales for EIA development to be considered; 5. Negotiation and signing of a s106 agreement and / or other legal agreements; 6. Submission of Reserved Matters application (per phase) / discharge of planning conditions and other consents/licenses (SAB Approval etc) Any potential risks to project delivery timings (for example: contamination and

remediation delays in respect of the

brownfield sites, potential issues surrounding gaining SAB approval and any other potential delays) should be considered and clearly factored into a transparent and realistic delivery timeframe. It is accepted that a notable extent of supporting up-front technical and deliverability information is necessary as part of the candidate site allocation process when compared with preceding / existing plans in an attempt to de-risk the allocation of sites and reduce the likelihood of non-delivery. It is nonetheless considered that the new burdens of the planning and other legislative associated processes likewise add to the delivery timeframes, and therefore the frontloading of the process does not entirely de-risk the process in terms of avoiding delays to delivery.

Evidently, the contractual transfer of land to house builders / developers with regard to the landowner promoted and Councilowned sites proposed to be allocated within the Deposit Plan is likely to be complex and could add to further delay to the delivery of various sites, notwithstanding the evidence that is advised as having been presented to the Council to-date (i.e. Memorandums of Understanding and procurement of development partners). Persimmon Homes West Wales reiterate that such issues do not apply to the candidate sites being promoted on their behalf - i.e. Land at Broadlands, Land south of Coychurch and Zig Zag Lane, Porthcawl. In addition, notwithstanding concept masterplan development by landowners, it is anticipated to be likely that future housebuilders will wish to input into the master planning exercise to ensure the site layout is feasible from a delivery / commercial perspective and that it meets Placemaking objectives. As such, the pre-planning phase preparation is likely to be more complex and time consuming than is suggested by some of the current trajectories. For transparency, the revised

timeframes and supporting rationale should be published for comment and to allow alterations to the Plan prior to the submission of the Deposit Plan for examination It is considered that there are insufficient realistically deliverable site allocations in the short to medium term of non-strategic sites to deliver houses i.e. the first 5 years beyond adoption. The inclusion of additional medium and largescale sites would offer the County Borough greater potential to achieve its target housing numbers. Whilst the rationale behind the focus towards the allocation of strategic sites based on the shortcomings of over-reliance on small sites in the existing LDP is understood, it is not accepted that the evident lack of sufficient short to medium term deliverable homes can be reasonably justified by the Council's perception that the inability of such sites to provide on-site infrastructure or new local infrastructure in the vicinity of the site (i.e. where financial contributions are relied upon).

Soundness: The Deposit Plan as currently drafted fails Test 1, 2 and 3 in terms of the housing trajectory phasing / timeframes of proposed allocations delivery and is not deemed to be reasonable and balanced, deliverable and provide sufficient contingency in line with PPW 11.

The reliance on the larger more complex strategic and large sites in the Deposit Plan and the currently over ambitious delivery / Anticipated Annual Build Rates targets for some of the sites will hinder the County Borough's ability to realistically meet phasing trajectory. This could stifle delivery of much needed new homes in Bridgend County Borough if other additional sites are not allocated to accommodate such shortfalls within the earlier years.

Recommendation: In view of the above, it is recommended:

<ul> <li>Revisit and request further supporting evidence to verify the likelihood / realism of all strategic and large site allocations (except land South of Pont Rhyd-y-cyff) coming forward by 2025/26. This should be made available for public scrutiny, prior to the submission of the Deposit Plan for examination;</li> <li>Allocate additional developer-led residential sites within Plan Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1 that are free or readily freed from planning, physical and ownership constraints, and are economically viable at the delivery point of the trajectory. Land at Broadlands, Land at Coychurch and Zig Zag Lane, Porthcawl sites are all deemed to fall within this category and are therefore primed to address the short to medium term deficiency of the proposed housing</li> </ul>		
strategy. Persimmon Home West Wales support the overarching strategy to deliver 505 homes per year, however Persimmon Homes West Wales object to the over-reliance on the Porthcawl Regeneration Growth Area for the delivery of homes in Porthcawl. Lack of delivery of the regeneration sites (Porthcawl Waterfront) as per the trajectory over the Plan Period could result in failure to deliver the housing numbers and growth objectives required for Porthcawl as a Main Settlement. Likewise, the approach to the exclusion of Land at Broadlands (ref: 221.C1) in West Bridgend (PLA3) and over-reliance on 'roll-over' site Parc Afon Ewenni in south / east Bridgend is equally fundamentally questioned and therefore objection is raised with regard to the Sustainable Growth Area for Bridgend. See attached overarching representations (dated 27th July 2021) and candidate site specific representations (Broadlands (ref:221.C1), Coychurch (ref:221.C3) and Zig Zag Lane, Porthcawl (ref: 221.C2)	Support the Growth Strategy, object to the 'over-reliance' on rollover sites Porthcawl Waterfront and Parc Afon Ewenni, object to the non-allocation of Land at Broadlands (ref: 221.C1)	The representor's support for the Growth Strategy is noted. Two existing large scale brownfield regeneration sites were initially proposed for re-a and Porthcawl Waterfront) within the Replacement LDP, both of which were conside of housing supply to enable delivery of the housing requirement. Before being 'rolle Plan, both sites were subject to robust re-assessment of their sustainability, deliverable in the same manner as all other candidate sites. In the case of Porthcawl Wartefront, it change in circumstances to demonstrate the sites can be delivered over the Re- indicated within the housing trajectory (refer to the Housing Trajectory Backgrou Options Background Paper and Candidate Site Assessment). For Parc Afon Ewenni, the Council has now removed the site from the housing traj- subsequent uncertainty relating to delivery timescales. The Candidate Site Assessm- updated to reflect this constraint, of which states that 'the site is located within the Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The allocation from the existing LDP (REG1(6)) and is proposed to be developed for uses. However, the Council's Strategic Flood Consequences Assessment identifies vulnerable to flood risk. As such, the site will not therefore be allocated for develor LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewenni due to the timescales as a result of flood risk. For Porthcawl Waterfront, the Council has now purchased and has total control over 1 defence works are progressing on site and are due to be completed by the end of 20 currently being explored in order to bring forward development, initial work has

e-allocation (Parc Afon Ewenni dered deliverable components olled forward' into the Deposit rability and viability credentials at, there has been a substantial Replacement LDP period, as ound Paper, Spatial Strategy

rajectory due to flood risk and sment (2022) report has been in the settlement boundary of he site represents a 'Rollover' or commercial and residential les that the site is significantly elopment in the Replacement the uncertainty over delivery

er Phase 1 (Salt Lake), coastal 2022. Partnership options are as commenced in relation to

	(dated 27th July 2021) submitted on behalf of Persimmon Homes West Wales regarding the approach to housing growth and trajectories, and the need to allocate additional housing sites deliverable in the early plan years. For the reasons mentioned above and in the supporting representation letters, we consider the Deposit Plan to be 'unsound' as currently drafted, on the basis of Test 2 (the regeneration growth strategy only for Porthcawl, the exclusion of Broadlands from West Bridgend growth strategy is not logical, nor is the over-reliance on 'roll- over' site Parc Afon Ewenni in south / east Bridgend) and Test 3 (that the Deposit Plan is unlikely to deliver in the relevant timescales and allow for appropriate contingency provisions).		procurement mechanisms and a formal procurement exercise is scheduled to co (Sandy Bay / Coney Beach) is being jointly promoted by the Council and a priva majority of the site is not reliant on coastal defence works to come forward. A land-ow a disposal strategy is being finalised and the site is likely to be brought to the marke Phase 2 now running in parallel, there is now no reason why both phases will be un forward together, as further evidenced by the extensive supporting deliverabilit representor's objection to Porthcawl Waterfront is considered unsubstantiated and is The total housing provision, and spatial distribution thereof, has also been subjed analysis to enable development of the housing trajectory. The trajectory was prep dialogue with the respective site-promoters, followed by effective collaboration and is stakeholders at a Stakeholder Group Meeting. As documented within the Housing Tra there were no outstanding matters of disagreement on the completion figures or the in the plan period (including those sites with planning permission and new hou conclusion of the Stakeholder Group Meeting. In summary therefore, the represe Porthcawl Waterfront are not supported. Informed by the Sustainability Appraisal Report, the Candidate Site Assessment p Deposit Plan confirms and provides reasoned justification for the outcome of the site of each candidate site. In relation to Broadlands (Candidate Site Ref: 221.C1) sp states, "The candidate site is located on the periphery of Bridgend which is identified as a S defined by SP1). There are education capacity issues in the area whereby a site exacerbate without the ability of resolving them. Whilst the sustainability and place m are acknowledged, there are other more suitable sites that have been carried fo Deposit Plan without the presence of such issues. Therefore, this site will not be allow Whilst the Council notes the representor's objection to this conclusion, the proposit
345	Technical Advice Note (TAN) 1 and the requirement therein for a five-year supply of housing land was revoked by the Welsh Government by the Ministerial letter issued on 26th March 2020. This letter sets out that high quality new homes in the right locations are essential for our future wellbeing. Given the infancy of this policy change, it seems appropriate to review and comment on the County's historic rate of housing delivery. The 2019 Joint Housing Land Availability Study (JHLAS) for Bridgend was the sixth assessment of the County Borough's housing land supply since the adoption of the LDP in September 2013. It was also the third successive assessment demonstrating that Bridgend has a housing land supply for the Plan area below the 5-year requirement identified within TAN1 (the	Concerns raised regarding forthcoming housing supply due to past delivery trends and because the flexibility allowance "may be insufficient"	reasons outlined. The detailed evaluation within the Strategic Growth Options Background Paper in Strategy as the most appropriate to achieve a balanced and sustainable level of facilitate the continued transformation of the County Borough into a network of s communities that connect more widely with the region. It is considered optimal to enable the delivery of key infrastructure, secure affordable housing and improve con over-development. The analysis also demonstrates that the Growth Option is rea benchmarked against past delivery rates, whilst also being robustly grounded in p and migration trends. Indeed, whilst it is important to understand past delivery circumstances that influenced them, the evidence-based work underpinning delive provides certainty that this scale of growth is achievable. On average, the annual at been 450 dwellings over the whole existing LDP period. Underpinning the Replace requirement of 505 dpa therefore represents a realistic and sustainable upturn in a rates compared to that witnessed during the existing LDP period. However, as de Strategic Growth Options Background Paper, the Replacement LDP's evidence bas past build rates as the sole evidence base to quantify future employment and housin and detailed evidence base has been developed and evaluated to identify the sca necessary to deliver the Vision, Aims and Objectives.

commence shortly. Phase 2 ivate owner and a significant owners agreement is in place, ket shortly. With Phase 1 and unable to progress and come bility evidence. As such, the d is not supported.

bject to site-specific phasing repared initially through close d involvement with a range of Trajectory Background Paper, he timing and phasing of sites nousing allocations) following esentor's concerns regarding

e published to accompany the te selection process in respect specifically, the Assessment

Sustainable Growth Area (as site of this size would further making credentials of the site forward as allocations in the allocated in the Deposit Plan".

osal is not supported for the

justifies the chosen Growth of economic growth that will safe, healthy and inclusive to deliver economic growth, onnectivity without resulting in ealistic and deliverable when post-recession demographic ery rates and the contextual livery of the Growth Strategy average completion rate has acement LDP with a dwelling average dwelling completion demonstrated throughout the base has not simply relied on sing land requirements. A rich scale of new jobs and homes

	<ul> <li>2017 JHLAS identified a 4.0 year supply, the 2018 JHLAS identified a 3.4 year supply, whilst the 2019 JHLAS identified a 2.9 year supply). This is reflected in Annual Monitor Reports (AMRs) which have been published to date. In terms of housing delivery to-date, a total of 579 new dwelling completions (general market and affordable) were recorded between 1st April 2018 and 31st March 2019. Cumulatively, there has been a total of 2807 dwelling completions recorded since the Plan's adoption (i.e. 18th September 2013). This is significantly below the annual need. Put simply, based on the currently adopted plan, there is a shortfall of 5572 dwellings. It is evident that key housing sites are not being delivered as anticipated, which suggests the need for additional site allocations include a number of historic site allocation and whilst a flexibility allowance of 20% has been made, we are of the view this may be insufficient. As such, realistic and deliverable development opportunities (such as the subject site) must be taken where possible.</li> </ul>		All housing supply components that will deliver the housing requirement (comp commitments with planning permission, the large and small windfall site allowance ar are detailed in the Housing Trajectory Background Paper. Informed by the Sustainability Appraisal Report, the Candidate Site Assessment p Deposit Plan confirms and provides reasoned justification for the outcome of the site s of each candidate site. Identification of appropriate Sustainable Urban Extension accordance with the Site Search Sequence and other requirements set out in I documented in supporting evidence to the Plan. This includes the Candidate Site As Options Background Paper, Housing Trajectory Background Paper and Minimising the Land Background Paper. The rationale for the proposed allocations within the Deposit the Candidate Site Assessment. Without exception, all proposed sites are supported and viability evidence to demonstrate their deliverability. An Urban Capacity Study (UCS, 2020) was also published alongside the Deposit Plan of the potential urban capacity of the County Boroughs' settlements for housing to e and windfall site allowance rate. This UCS identifies more than sufficient capacity with boundaries to accommodate this particular component of housing supply. It therefor to past trends) that the small and windfall site allowance rate utilised in the Replac and deliverable. It also serves as a useful resource to developers and SMEs who are development opportunities not specifically allocated in the Replacement LDP. The total housing provision, and spatial distribution thereof, has also been subje analysis to enable development of the housing trajectory. The trajectory was prep dialogue with the respective site-promoters, followed by effective collaboration and i stakeholders at a Stakeholder Group Meeting. A An appropriate flexibility allowance (10%) has been embedded into the Deposit Plan clearly set out in the Housing Trajectory Background Paper. The flexibility allowan there may be certain specific circumstances, unknown
			requirement. Therefore, the representor's statements that suggest "additional site allocations and within the Replacement LDP and the flexibility allowance "may be insufficient" are c
1390	Lodgeground Ltd (Dovey Estates) support	None	and are not supported. Comments noted.
	the growth strategy.		
1404	The Regeneration and Growth Strategy proposed under Policy SP1 seeks to make provision for 9,207 new homes to meet a housing requirement of 7,575 dwellings	Increase the dwelling requirement to:	The representor has stated, "the 2018-based Household Projections are some 29% h projections which the LDP Preferred Strategy was based upon", although this comm

npletions to date, land bank and new housing allocations)

published to accompany the e selection process in respect ons has been undertaken in a Planning Policy Wales, as Assessment, Spatial Strategy the Loss of BMV Agricultural osit Plan is clearly outlined in d by a large body of technical

lan to provide further analysis evidence the expected small vithin the proposed settlement ore demonstrates (in addition acement LDP is both realistic re seeking to identify potential

bject to site-specific phasing epared initially through close d involvement with a range of Trajectory Background Paper, he timing and phasing of sites ousing allocations) following

an and the basis for which is ance recognises the fact that hat delay the delivery of sites, flexibility allowance, chosen rtably deliverable in the event aration. With a 10% flexibility ighout the plan period even if cur. The total level of housing ensure delivery of the housing

nd windfall sites" are needed considered unsubstantiated

6 higher than the 2014-based ment is factually inaccurate.

(based on a Flexibility Allowance),	9,772 homes with	
including 1,977 affordable homes. The	a flexibility	Paper, a range of 2014-based scenarios and alternatives were initially analysed to i
10% increase in Flexibility Allowance	allowance of	(Low, Mid and High) at Preferred Strategy stage. These options were selected
(bringing the allowance to 20%) is	1,954	representative of identified scenarios, reasonable in relation to the evidence base
supported not least given that the currently	and	enable different strategic planning responses. They enabled more detailed analysis
LDP has a record of under delivery against	and	growth aligned with the issues the Replacement LDP is seeking to address. Overall, t
its existing housing requirement. In	10 177 homeo	dwellings per annum) was selected to underpin the Preferred Strategy, considere
respect of LDP Reviews, the Welsh	13,177 homes	supporting economic growth, enabling the delivery of key infrastructure, securir
Government's Development Plans Manual	with a housing	improving connectivity without resulting in over-development. At Preferred Strategy
states at Para 3.83 that "Updates to	supply of 15,813	this Growth Option would deliver against the full range of issues the Replacement
nationally published data, such as	homes (with 20%	and enable realisation of all four Strategic Objectives. Contrary to the representor's
household and population projections may	flexibility	Option was based on the POPGROUP Short Term Scenario, which projected migrati
also provide a contextual change which	allowance).	period (2011/12–2016/17), a time period consistent with ONS methods, updated to in
should be taken into account". The		of population statistics. This produced a growth option that reflected the most recent, p
housing requirement (of 7,575 homes) is		data available at Preferred Strategy stage, which captured a positive period of sustai
unchanged since that set out in the LDP		forward projection.
Preferred Strategy in 2019 – albeit a		The Mid Growth Option (i.e. 505 dee) underninging the Dreferred Strategy was as
greater Flexibility Allowance of 20% has		The Mid Growth Option (i.e. 505 dpa) underpinning the Preferred Strategy was co
now been adopted. Since the Preferred Strategy was issued, Welsh Government		2014-based principal projection (i.e. 271 dpa) to enable continuation of the po-
have published updated household		witnessed in the years following the Great Recession. Even though the 2018-based higher than the 2014-based baseline, the number of dwellings it would support (i.e.
projections. The 2018-based Household		below the dwelling requirement justified at Preferred Strategy stage. This is an im
Projections are some 29% higher than the		demonstrates that the dwelling requirement under the Mid Growth Option (i.e. 505 d
2014-based projections which the LDP		positive, yet sustainable economic growth in the County Borough, over and above
Preferred Strategy was based upon. The		accordance with the Replacement LDP's Aims and Objectives.
housing requirement should be further		
reviewed and increased to reflect the		A range of refreshed growth scenarios were duly considered in the Demographics
increased household projections. Based		including the suite of WG 2018-based population and household projections, alterna
on the current level of growth proposed,		alternatives. These additional scenarios also incorporated the 2019 mid-year estin
this would equate to a housing		June 2020. The PG-Short Term Variant, which originally underpinned the Mid Gro
requirement of 9,772 homes with a		updated. The refreshed PG-Short Term Scenario uses an ONS 2019 Mid-Yea
flexibility allowance of 1,954 homes		calibrates its migration assumptions from a more recent 6-year historical period
providing a housing supply of 11,726		approach consistent with ONS methods. This period still captures the more po
homes. It is considered that the High		demographic trends post the Great Recession and therefore still represents a perio
Growth Option considered at the Preferred		growth for forward projection. This is consistent with the approach at Preferred Strate
Strategy stage should inform the housing		on more recent demographic data. It also pre-dates the shorter-term impacts caused
requirement – this set out a need (not		ensuring the scenario is not grounded in negative, recession-laden trends. Clearly,
accounting for flexibility allowance) for the		Variant still supports the same level of dwelling growth as identified at Preferred Strate
delivery of 681 dwellings per annum and		in detail within the Strategic Growth Options Background Paper.
employment growth of +524. This would		
result in a housing requirement of 10,215		The representor has advocated two different, yet contradictory, dwelling requirement
dwellings over the plan period and a		assumption that the Council has failed to take the latest 2018-based projections in
housing supply of 12,258 homes (with		representor has provided insufficient supporting evidence to justify these alternative
20% flexibility allowance). Applying the		is provided below:
29% uplift as a result of the 2018-based		
household projections would provide a		Representor Option 1: "The 2018-based Household Projections are some 2
housing requirement of 13,177 homes and		based projections which the LDP Preferred Strategy was based upon (sic).
a housing supply of 15,813 homes (with		should be further reviewed and increased to reflect the increased household
20% flexibility allowance). This higher level		current level of growth proposed, this would equate to a housing requirement
of growth is considered more appropriate		flexibility allowance of 1,954 homes providing a housing supply of 11,726 homes

c Growth Options Background to inform three growth options acted on the basis of being se and sufficiently diverse to sis into how different levels of II, the Mid Growth Option (505 ared likely to perform best by uring affordable housing and gy stage it was concluded that nt LDP is seeking to address r's deduction, the Mid Growth ation over a six-year historical o include the latest three years at, post-recession, trend based trainable, economic growth for

considerably higher than the positive, sustainable growth sed principal projection is now i.e. 378 per annum) is still far important consideration as it 5 dpa) would still enable more pove the revised baseline, in

cs Update Addendum (2020), rnative trend and housing-led stimate, published by ONS in Growth Option, has also been ear-Estimate base year and riod (2013/14–2018/19), an positive socio-economic and riod of sustainable, economic ategy stage, although is based sed by the pandemic, thereby y, the revised PG-Short Term rategy stage. This is explained

ments based on an incorrect into account. In addition, the re growth options. A summary

e 29% higher than the 2014*ic*). The housing requirement old projections. Based on the ement of 9,772 homes with a omes".

in achieving adequate links between homes and jobs (as required by PPW Para 4.2.6), harnessing the benefit from an influx of younger, economically active households to counter-balance the ageing local population (which is a key issue for the County Borough) and to align with the town's position as part of the Cardiff Capital Region and being within a National Growth Area within Future Wales 2040.	<ul> <li>Council response: This proposed dwelling requirement is not considered to representor has applied an arbitrary uplift to the housing requirement proposed effect, the representor has used a proportionate trend from one demograph another. This overly simplistic approach is not based on a robust projectidemographic relationship between homes and jobs and has failed to tangibly level would align with the issues and objectives the Replacement LDP is seek is not supported.</li> <li>Representor Option 2: "It is considered that the High Growth Option considered to the representor option option option for the term option option considered that the High Growth Optio</li></ul>
	stage should inform the housing requirement – this set out a need (not account for the delivery of 681 dwellings per annum and employment growth of + housing requirement of 10,215 dwellings over the plan period and a housi (with 20% flexibility allowance). Applying the 29% uplift as a result of projections would provide a housing requirement of 13,177 homes and a housi (with 20% flexibility allowance)".
	Council response: Despite framing the representation in the context or projection, the representor has simultaneously advocated using the 'High G Preferred Strategy Stage, which was based on more historic migration as period of significant economic growth (2001/02–2007/08) prior to the Great has therefore provided a contradictory recommendation this respect. More Options Background Paper has clearly set out the reasons why the High G forward. For ease of reference, the Paper concluded that 'the risk with the H may place too much emphasis on outright economic growth and could neces greenfield sites on the periphery of settlements, which could promote ca pressure on existing infrastructure, encourage out-commuting and necessita movement. This would be at the expense of more placemaking-led sustain regeneration schemes. This may render it difficult to balance the four strateg equilibrium between economic growth and sustainable development'.
	The representor has equally applied an arbitrary uplift 'as a result of projections' to the High Growth Option as a basis for a 13,177 dwelling requi highly simplistic methodology that is not underpinned by a robust projected crudely calculates proportionate growth from one scenario and attempts to a proceeding with a dwelling requirement of this scale would require doubling paind would only serve to further exacerbate the negative consequences of already discussed in the Strategic Growth Options Background Paper.
	The Council considers that the representor has sought to artificially manufacture the requirement as justification to include extra housing sites within the Plan, despit requirements lacking any sound basis or tangible analysis of how they would achieve objectives the Plan is seeking to address.
	Instead, the Deposit Plan has been underpinned by a balanced level of economic gr based on well informed, evidence based judgements regarding need, demand and Strategic Growth Options Background Paper). This has considered how the Coursituation is likely to change from 2018-2033 and informed the most appropriate result. LDP. As such the Replacement LDP identifies an appropriate plan requirement to

b have a sound basis as the posed in the Deposit Plan. In hic scenario and applied it to tion, has not considered the y analyse how such a growth ting to address. This proposal

ered at the Preferred Strategy inting for flexibility allowance) +524. This would result in a sing supply of 12,258 homes the 2018-based household using supply of 15,813 homes

of the 2018-based principal Growth Option' considered at assumptions projected from a c Recession. The representor reover, the Strategic Growth Growth Option was not taken High Growth Option is that it asitate allocation of excessive ar-dependency, place undue ate unsustainable patterns of inable urban extensions and gic objectives and achieve an

the 2018-based household irement. This is considered a ted scenario, rather one that apply it to another. Moreover, bast annual completions rates f the High Growth Option as

the highest possible dwelling te these alternative dwelling eve the key issues, aims and

prowth and housing provision, ad supply factors (refer to the unty Borough's demographic esponse for the Replacement o enable a balanced level of

			<ul> <li>housing and employment provision that will achieve sustainable patterns of growth, s and maximise viable affordable housing delivery. The level of household growth propactually 33% higher than Welsh Government's 2018 based principal projection. This with Bridgend being within a National Growth Area as defined by Future Wales, whi Government in response to the Deposit Plan Consultation. This level of growth w position as a highly sustainable and accessible destination that benefits both the Co regions.</li> <li>The representor's proposals are not supported.</li> </ul>
219	With regards to housing, a requirement of 7,575 homes is identified, on top of which a 20% flexibility allowance is made. The setting of the housing requirement follows the guidance set out in Paragraph 4.2.6 of Planning Policy Wales in that it makes use of household projections and has been robustly considered as part of the consultation on the Preferred Strategy. The identified housing requirement is supported by Bridgend College. At Preferred Strategy stage Bridgend College lobbied for a robust flexibility allowance on top of the housing requirement as, despite the adopted LDP incorporating a 10% buffer, there has been an under-delivery of housing as certain sites have not been delivered. Bridgend College therefore support the use of a larger flexibility allowance of 20%.	being proposed.	
	Next, the policy identifies a total of four Regeneration Growth Areas and three Sustainable Growth Areas which are to be the focus for regeneration and sustainable growth. It is evident that these have been informed by the settlement hierarchy set out in Policy SF1 (which in turn is determined by the range of facilities, access to services, and connectivity), the Bridgend Settlement Assessment (2019), and the strategic approach that the LDP is to take. The designation of Pencoed as a Sustainable Growth Area and the inclusion of the "Land East of Pencoed" site within it is supported by Bridgend College. Support: Policy SP1 is supported but there is a requirement for the Strategic	be proposed.	Comments of support noted.

h, support existing settlements proposed in the Deposit LDP is This degree of aspiration aligns which was confirmed by Welsh will also enhance Bridgend's County Borough and the wider

	Allocations to be included within Pencoed's settlement boundaries.		
407	Policy SP1: Regeneration and Sustainable Growth Strategy This is a strategic level policy which sets out the growth strategy for BCBC. With regards to housing, a requirement of 7,575 homes is identified, on top of which a 20% flexibility allowance is made. The setting of the housing requirement follows the guidance set out in Paragraph 4.2.6 of Planning Policy Wales in that it makes use of household projections and has been robustly considered as part of the consultation on the Preferred Strategy. The identified housing requirement is supported by HD Ltd. At Preferred Strategy stage HD Ltd lobbied for a robust flexibility allowance on top of the housing requirement as, despite the adopted LDP incorporating a 10% buffer, there has been an under-delivery of housing as certain sites have not been delivered. HD Ltd therefore support the use of a larger flexibility allowance of 20%. Next, the policy identifies a total of four Regeneration Growth Areas and three Sustainable Growth Areas which are to be the focus for regeneration and sustainable growth. It is evident that these have been informed by the settlement hierarchy set out in Policy SF1 (which in turn is determined by the range of facilities, access to services, and connectivity), the Bridgend Settlement Assessment (2019), and the strategic approach that the LDP is to take. The designation of Bridgend as a Sustainable Growth Area and the inclusion of "Land South of Bridgend (Island Farm)" within it is supported by HD Ltd. Support: Policy SP1 is supported.	being proposed.	Comments of support acknowledged.
	PolicySP6:SustainableHousingStrategyThis policy sets out the strategic approach to housing, identifying the housing requirement and the proposed before, before outlining how this will be delivered. As per HD Ltd's comments with regards to	SP6: proposed changes to policy wording to ensure consistency.	As noted by the representor Policy SP6 and supporting paragraphs 4.3.57 and 4. Settlement Sites'. Therefore, it is not considered necessary to amend Policy C explanatory text. Policy COM1 is based on Table 17 in Welsh Government's Deve

4.3.58 clearly refer to 'Edge of COM1 and include additional velopment Plans Manual.

	Strategy), the proposed housing requirement and associated flexibility allowance is supported. The delivery of the Strategic Sites is identified as one of six elements of the Sustainable Housing Strategy and the support given to the delivery of these sites is supported by HD Ltd. As well as "Land South of Bridgend (Island Farm)", HD Ltd is promoting the "Craig-Y-Parcau" site to the south of	change to policy wording – third bullet point.	Policy SP6 clearly states that development will be distributed in accordance with Stra the Sustainable Housing Strategy that includes reference to 'edge of settlement site considered appropriate in the current form.
	Bridgend. The third bullet point makes reference to "Edge of Settlement Sites" which are defined in Paragraphs 4.3.57 and 4.3.58 but are not included within the table or text at Policy COM1 (Housing Allocations) being instead noted as "Housing Allocations". There is a need for consistency on how these sites are described throughout the Deposit LDP but it is also suggested that a replacement third	Policy SF1: proposed change	The proposed policy wording is considered unnecessary as the proposals map changes to the settlement boundaries to accommodate all allocations proposed in the
	it is also suggested that a replacement third bullet point is added as follows: "3) Enable Edge of Settlement Sites within, and on the edge of, established settlements Support the delivery of the "Housing Sites" that are identified in Policy COM1"; Linked to HD Ltd's comments on Policy SF1 (Settlement Hierarchy and Urban Management), there is a requirement for settlement boundaries to be extended to include the Strategic Allocations (and proposed allocations) so as not to result in a conflict with the second paragraph of Policy SP6 (Sustainable		
105	Housing Strategy) which resists residential development outside of settlement boundaries. Change sought: Revise policy SP6 wording as above, refer to the "Edge of Settlement sites" as "Housing Allocations", and include allocated sites within settlement boundaries.		
425	The Regeneration and Growth Strategy proposed under Policy SP1 seeks to make	Objection to Policy SP1 – the	The rationale for the Growth Strategy is detailed within the Strategic Growth Options
	provision for 9,207 new homes to meet a housing requirement of 7,575 dwellings (based on a Flexibility Allowance), including 1,977 affordable homes. The 10% increase in Flexibility Allowance (bringing the allowance to 20%) is	representor suggests that the High Growth option should	The Regeneration and Growth Strategy proposed under Policy SP1 seeks to mal homes to meet a housing requirement of 7,575 dwellings (based on a Flexibility A affordable homes. The 10% increase in Flexibility Allowance (bringing the allowanc least given that the currently LDP has a record of under delivery against its existing respect of LDP Reviews, the Welsh Government's Development Plans Manual states to nationally published data, such as household and population projections may also p
	supported not least given that the currently LDP has a record of under delivery against its existing housing requirement.	Stage should inform the	which should be taken into account". The housing requirement (of 7,575 homes) is up in the LDP Preferred Strategy in 2019 – albeit a greater Flexibility Allowance of 20 Since the Preferred Strategy was issued, Welsh Government have published upda

## trategic Policy SP1, based on tes'. Therefore, Policy SP6 is

clearly details the proposed the plan.

## ns Background Paper.

nake provision for 9,207 new y Allowance), including 1,977 ance to 20%) is supported not sting housing requirement. In ites at Para 3.83 that "Updates to provide a contextual change s unchanged since that set out 20% has now been adopted. odated household projections.

In respect of LDP Reviews, the Welsh	housing	The 2018-based Household Projections are some 29% higher than the 2014-based
Government's Development Plans Manual	requirement.	Preferred Strategy was based upon. The housing requirement should be further in
states at Para 3.83 that "Updates to		reflect the increased household projections. Based on the current level of growth pr
nationally published data, such as		to a housing requirement of 9,772 homes with a flexibility allowance of 1,954 homes
household and population projections may also provide a contextual change which		of 11,726 homes. It is considered that the High Growth Option considered at the Preference inform the housing requirement – this set out a need (not accounting for flexibility all
should be taken into account".		681 dwellings per annum and employment growth of +524. This would result in a hou
The housing requirement (of 7,575 homes)		dwellings over the plan period and a housing supply of 12,258 homes (with 20% flex
is unchanged since that set out in the LDP		the 29% uplift as a result of the 2018-based household projections would provide
Preferred Strategy in 2019 – albeit a greater		13,177 homes and a housing supply of 15,813 homes (with 20% flexibility allowance).
Flexibility Allowance of 20% has now been		is considered more appropriate in achieving adequate links between homes and jobs
adopted. Since the Preferred Strategy was		4.2.6), harnessing the benefit from an influx of younger, economically active househousehousehousehousehousehousehouse
issued, Welsh Government have published		ageing local population (which is a key issue for the County Borough) and to align
updated household projections. The 2018-		part of the Cardiff Capital Region and being within a National Growth Area within Fut
based Household Projections are some		
29% higher than the 2014-based		Summary:
projections which the LDP Preferred		
Strategy was based upon. The housing		Increase the dwelling requirement to:
requirement should be further reviewed and		9,772 homes with a flexibility allowance of 1,954
increased to reflect the increased		and 12,177 homes with a housing supply of 15,912 homes (with 20% flowibility allowerse
household projections. Based on the current level of growth proposed, this would		13,177 homes with a housing supply of 15,813 homes (with 20% flexibility allowance
equate to a housing requirement of 9,772		
homes with a flexibility allowance of 1,954		Response:
homes providing a housing supply of 11,726		
homes.		The representor has stated, "the 2018-based Household Projections are some 29% h
It is considered that the High Growth Option		projections which the LDP Preferred Strategy was based upon", although this comm
considered at the Preferred Strategy stage		
should inform the housing requirement -		As detailed in the Demographic Analysis and Forecasts Report (2019) and Strategic G
this set out a need (not accounting for		Paper, a range of 2014-based scenarios and alternatives were initially analysed to i
flexibility allowance) for the delivery of 681		(Low, Mid and High) at Preferred Strategy stage. These options were selected
dwellings per annum and employment		representative of identified scenarios, reasonable in relation to the evidence base
growth of +524. This would result in a		enable different strategic planning responses. They enabled more detailed analysis
housing requirement of 10,215 dwellings		growth aligned with the issues the Replacement LDP is seeking to address. Overall, t
over the plan period and a housing supply of 12,258 homes (with 20% flexibility		dwellings per annum) was selected to underpin the Preferred Strategy, considered supporting economic growth, enabling the delivery of key infrastructure, securin
allowance). Applying the 29% uplift as a		improving connectivity without resulting in over-development. At Preferred Strategy
result of the 2018-based household		this Growth Option would deliver against the full range of issues the Replacement
projections would provide a housing		and enable realisation of all four Strategic Objectives. Contrary to the representor's
requirement of 13,177 homes and a		Option was based on the POPGROUP Short Term Scenario, which projected migration
housing supply of 15,813 homes (with 20%		period (2011/12-2016/17), a time period consistent with ONS methods, updated to in
flexibility allowance).		of population statistics. This produced a growth option that reflected the most recent, p
This higher level of growth is considered		data available at Preferred Strategy stage, which captured a positive period of sustain
more appropriate in achieving adequate		forward projection.
links between homes and jobs (as required		
by PPW Para 4.2.6), harnessing the benefit		The Mid Growth Option (i.e. 505 dpa) underpinning the Preferred Strategy was co
from an influx of younger, economically		2014-based principal projection (i.e. 271 dpa) to enable continuation of the po
active households to counter-balance the		witnessed in the years following the Great Recession. Even though the 2018-based
ageing local population (which is a key issue		higher than the 2014-based baseline, the number of dwellings it would support (i.e.
for the County Borough) and to align with		below the dwelling requirement justified at Preferred Strategy stage. This is an im

ed projections which the LDP r reviewed and increased to proposed, this would equate es providing a housing supply eferred Strategy stage should allowance) for the delivery of ousing requirement of 10,215 lexibility allowance). Applying de a housing requirement of e). This higher level of growth bs (as required by PPW Para eholds to counter-balance the gn with the town's position as Future Wales 2040.

ce).

6 higher than the 2014-based ment is factually inaccurate.

c Growth Options Background o inform three growth options cted on the basis of being se and sufficiently diverse to sis into how different levels of I, the Mid Growth Option (505 red likely to perform best by ring affordable housing and y stage it was concluded that nt LDP is seeking to address is deduction, the Mid Growth ation over a six-year historical include the latest three years t, post-recession, trend based tainable, economic growth for

considerably higher than the positive, sustainable growth ed principal projection is now .e. 378 per annum) is still far important consideration as it

the town's position as part of the Cardiff Capital Region and being within a National	demonstrates that the dwelling requirement under the Mid Growth Option (i.e. 505 d positive, yet sustainable economic growth in the County Borough, over and above
Growth Area within Future Wales 2040.	accordance with the Replacement LDP's Aims and Objectives.
	A range of refreshed growth scenarios were duly considered in the Demographics including the suite of WG 2018-based population and household projections, alternatives. These additional scenarios also incorporated the 2019 mid-year estim June 2020. The PG-Short Term Variant, which originally underpinned the Mid Groupdated. The refreshed PG-Short Term Scenario uses an ONS 2019 Mid-Year calibrates its migration assumptions from a more recent 6-year historical period approach consistent with ONS methods. This period still captures the more por demographic trends post the Great Recession and therefore still represents a period growth for forward projection. This is consistent with the approach at Preferred Strate on more recent demographic data. It also pre-dates the shorter-term impacts caused ensuring the scenario is not grounded in negative, recession-laden trends. Clearly, Variant still supports the same level of dwelling growth as identified at Preferred Strate
	in detail within the Strategic Growth Options Background Paper.
	The representor has advocated two different, yet contradictory, dwelling requirement assumption that the Council has failed to take the latest 2018-based projections in representor has provided insufficient supporting evidence to justify these alternative is provided below:
	• Representor Option 1: "The 2018-based Household Projections are some 2 based projections which the LDP Preferred Strategy was based upon (sic). The hour further reviewed and increased to reflect the increased household projections. Ba growth proposed, this would equate to a housing requirement of 9,772 homes with a findmes providing a housing supply of 11,726 homes".
	Council response: This proposed dwelling requirement is not considered to have representor has applied an arbitrary uplift to the housing requirement proposed in the representor has used a proportionate trend from one demographic scenario and appli simplistic approach is not based on a robust projection, has not considered the between homes and jobs and has failed to tangibly analyse how such a growth level and objectives the Replacement LDP is seeking to address. This proposal is not support.
	• Representor Option 2: "It is considered that the High Growth Option considered stage should inform the housing requirement – this set out a need (not accounting the delivery of 681 dwellings per annum and employment growth of +524. This requirement of 10,215 dwellings over the plan period and a housing supply of 12,258 allowance). Applying the 29% uplift as a result of the 2018-based household projection requirement of 13,177 homes and a housing supply of 15,813 homes (with 20% flex
	Council response: Despite framing the representation in the context of the 2018-bas representor has simultaneously advocated using the 'High Growth Option' consid Stage, which was based on more historic migration assumptions projected from a pe growth (2001/02–2007/08) prior to the Great Recession. The representor has therefor recommendation this respect. Moreover, the Strategic Growth Options Background P reasons why the High Growth Option was not taken forward. For ease of reference 'the risk with the High Growth Option is that it may place too much emphasis on out

dpa) would still enable more ove the revised baseline, in

es Update Addendum (2020), rnative trend and housing-led timate, published by ONS in rowth Option, has also been ear-Estimate base year and riod (2013/14– 2018/19), an positive socio-economic and riod of sustainable, economic tegy stage, although is based sed by the pandemic, thereby /, the revised PG-Short Term ategy stage. This is explained

ments based on an incorrect into account. In addition, the e growth options. A summary

e 29% higher than the 2014busing requirement should be based on the current level of a flexibility allowance of 1,954

have a sound basis as the he Deposit Plan. In effect, the plied it to another. This overly he demographic relationship el would align with the issues upported.

g for flexibility allowance) for is would result in a housing 58 homes (with 20% flexibility tions would provide a housing exibility allowance)".

ased principal projection, the idered at Preferred Strategy period of significant economic efore provided a contradictory I Paper has clearly set out the ce, the Paper concluded that putright economic growth and

			could necessitate allocation of excessive greenfield sites on the periphery of settlen car-dependency, place undue pressure on existing infrastructure, encourage out-our unsustainable patterns of movement. This would be at the expense of more placema extensions and regeneration schemes. This may render it difficult to balance the for achieve an equilibrium between economic growth and sustainable development'.
			The representor has equally applied an arbitrary uplift 'as a result of the 2018-base the High Growth Option as a basis for a 13,177 dwelling requirement. This is con- methodology that is not underpinned by a robust projected scenario, rather o proportionate growth from one scenario and attempts to apply it to another. Moreover requirement of this scale would require doubling past annual completions rates and exacerbate the negative consequences of the High Growth Option as already discus Options Background Paper.
			The Council considers that the representor has sought to artificially manufacture the requirement as justification to include extra housing sites within the Plan, despite requirements lacking any sound basis or tangible analysis of how they would achieve objectives the Plan is seeking to address.
			Instead, the Deposit Plan has been underpinned by a balanced level of economic gro based on well informed, evidence based judgements regarding need, demand and Strategic Growth Options Background Paper). This has considered how the Cour- situation is likely to change from 2018-2033 and informed the most appropriate resp LDP. As such the Replacement LDP identifies an appropriate plan requirement to housing and employment provision that will achieve sustainable patterns of growth, s and maximise viable affordable housing delivery. The level of household growth prop actually 33% higher than Welsh Government's 2018 based principal projection. This with Bridgend being within a National Growth Area as defined by Future Wales, whic Government in response to the Deposit Plan Consultation. This level of growth wi position as a highly sustainable and accessible destination that benefits both the Cour- regions.
			The representor's proposals are not supported.
5	The Deposit Local Plan outlines the strategy for growth which identifies five areas as suitable for regeneration and sustainable development. Ford supports the identification of Bridgend as a Sustainable Growth Area and the main area of growth as a sub-regional settlement. More particularly, the definition of the Sustainable Growth Areas is important as it confirms that it refers to the 'settlements most conducive to logical expansion through delivery of under- utilised sites within their functional area and / or on their periphery' and is relevant in the context of the now vacant Ford Engine site in Bridgend which presents opportunities for redevelopment to support the growth of the County Borough.	Support the growth strategy	Comments noted.

ements, which could promote t-commuting and necessitate making-led sustainable urban four strategic objectives and

sed household projections' to considered a highly simplistic one that crudely calculates ver, proceeding with a dwelling nd would only serve to further cussed in the Strategic Growth

the highest possible dwelling ite these alternative dwelling ieve the key issues, aims and

growth and housing provision, nd supply factors (refer to the punty Borough's demographic esponse for the Replacement to enable a balanced level of n, support existing settlements roposed in the Deposit LDP is his degree of aspiration aligns which was confirmed by Welsh will also enhance Bridgend's County Borough and the wider

	Do you have any comments to make on the s		• •
ID	Comment	Summary of changes being sought/proposed	Council response
82	In relation to the spatial strategy taken forward in the Deposit Draft RLDP, BDW has a number of comments relating to the proposed settlement hierarchy, the proposed definition of key settlements as 'Sustainable Growth Areas' (SGA) and 'Regeneration Growth Areas' (SGA), the reliance on the delivery of the Porthcawl Waterfront RGA and the identification of other strategic sites across the County Borough. Settlement Hierarchy BDW continues to support the inclusion of Porthcawl as a main settlement. Spatial Strategy The Regeneration and Sustainable Growth Strategy is supported. The current LDP has failed to deliver the anticipated growth particularly in Porthcawl and therefore the Replacement LDP needs to acknowledge and address these shortcomings in its strategy. BDW therefore supports the conclusion made by the Council that additional viable and deliverable sites (including some greenfield sites) are therefore required to ensure that the County Borough's future housing requirements can be delivered. However, the need for greenfield release needs to be extended to Porthcawl. Definition of Porthcawl as a Regeneration Growth Area The spatial strategy identifies a series of both SGAs and RGAs. Porthcawl is defined as a RGA, the aim of which is to deliver key regeneration sites for the benefit of the community through inward investment. In the case of Porthcawl, a single Strategic Site is identified, the Waterfront Site, which clearly underpins the identification of Porthcawl as a RGA (there are no other major brownfield opportunities in Porthcawl). We agree that the Waterfront has the potential to 'revitalise' the broader settlement but this does not amount to the provision of a range and mix new homes for families (where there is clear demand for them, as well as the Council's aspiration to mitigate against Porthcawl's aging		Porthcawl has been identified as a Regeneration Growth Area. The basis for this str Spatial Strategy Background Paper and it is considered the best option to align with 1 Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP Strategy is considered most conducive to accommodating the level of growth identif Options Background Paper and also delivering this growth through sustainable pa accord with the Planning Policy Wales' placemaking principles. It will maximise aff high-need areas, promote viable sustainable development, enable delivery of signil sites in accordance with the site search sequence and seek to minimise pressure subject to site-specific assessment. The total housing provision, and spatial distribution thereof, has been subject to site- enable development of the housing trajectory. The trajectory was prepared initially the respective site-promoters, followed by effective collaboration and involvement w at a Stakeholder Group Meeting. As documented within the Housing Trajectory Bac no outstanding matters of disagreement on the completion figures or the timing and period (including those sites with planning permission and new housing allocations) Stakeholder Group Meeting. Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subje of its sustainability, deliverability and viability credentials in the same manner as all o has been a substantial change in circumstances to demonstrate the site can be deliv LDP period, as indicated within the housing trajectory. The Council has now purch over Phase 1 (Salt Lake), coastal defence works are progressing on site and are d end of 2022. Partnership options are currently being explored in order to bring forwar has commence shortly. Whas P and Phase 2 now running in parallel, there is now no re be unable to progress and come forward together, as further evidenced by the extens evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bot supported. The proposal to include Candidate Site 3

strategy is detailed within the h the Vision and also the Key P is seeking to address. The htified in the Strategic Growth patterns of development that affordable housing delivery in nificant remaining brownfield re on BMV agricultural land,

e-specific phasing analysis to y through close dialogue with with a range of stakeholders ackground Paper, there were id phasing of sites in the plan s) following conclusion of the

ject to robust re-assessment I other candidate sites. There livered over the Replacement chased and has total control e due to be completed by the vard development, initial work ent exercise is scheduled to by the Council and a private rks to come forward. A landis likely to be brought to the reason why both phases will nsive supporting deliverability both unsubstantiated and not

y to the Spatial Strategy. The lexibility allowance to ensure ery and unforeseen issues in

population profile). The Proposals Map shows that the whole settlement of Porthcawl is proposed to be designated as a RGA which is inconsistent with the approach taken to other key settlements in the Plan, which also may rely, in part, on regeneration sites (i.e. Bridgend). BDW maintain that Porthcawl should be a SGA rather than a RGA in the Deposit Draft RLDP. This change in classification to a SGA would not preclude the delivery of the Waterfront site as an identified regeneration site which is in need of redevelopment and investment, but will allow flexibility within the wider settlement which, given its importance in the settlement hierarchy, is conducive to logical expansion through the delivery of other sites within the towns functional area and on its periphery (i.e. edge of settlement allocations). Reliance on the Porthcawl Waterfront Regeneration Site BDW is concerned that the Council's proposed reliance on the Porthcawl Waterfront Regeneration Site will not deliver the much-needed, new family housing in Porthcawl. It is considered that greenfield releases should be allocated at Porthcawl to ensure the Council does not undermine its CARM ambition. Relying on the Waterfront is not considered to meet the placemaking objectives of PPW 11. BDW continue to have concerns over the viability and deliverability of the Waterfront Site, both in terms of its likely trajectory and the amount and type of housing it is expected to deliver. Whilst it is understood that the Council has now made some progress, in terms of securing a supermarket operator (Aldi) to deliver a foodstore at the site, and has also obtained funding for the necessary flood defense infrastructure, these works need to be completed before housing can be built at the site. It is not considered that a meaningful amount of new housing can be delivered in the short to medium term. This delay in the delivery of new homes on the Waterfront Site reiterates the need for the Council to allocate other, deliverable sites which can provide new homes in the short to medium term in the main settlement of



	Porthcawl. BDW maintains that there		
	needs to be some flexibility for additional		
	sites to be allocated in the Deposit Draft		
	RLDP within or on the edge of Porthcawl,		
	including Land to the East of Dan-y-graig,		
	Porthcawl (Candidate Site Reference		
	312.C1) to ensure that a meaningful amount		
	of growth can be delivered for Porthcawl		
	during the Plan Period. It is concerning that		
	a strategy for Porthcawl that relies on the		
	delivery of some 1,115 units on the		
	Waterfront Site alone may fail – both in		
	terms of timing and the amount of growth		
	that can be delivered. It is considered that		
	the Council could continue to support the		
	regeneration of the Waterfront Site by		
	allocating it as a Regeneration Site, without		
	actually relying on it to contribute to		
	delivering the housing, as per the approach		
	it has taken to other regeneration site		
	allocations which have not been delivered		
	through the current LDP. An approach is		
	needed in the Deposit LDP that both de-		
	risks the delivery of the Waterfront Site and		
	ensues the delivery of housing in the short		
	term in light of recent undersupply. This		
	must be through the identification of sites		
	that are capable of making meaningful		
	contributions to supply whilst being		
	unconstrained such that they are		
	deliverable in the short term and early in the		
	Plan Period, including Land to the East of		
	Dan-y-graig, Porthcawl (Candidate Site		
	Reference 312.C1).		
	Other Strategic Sites		
	BDW is concerned that a number of the	General comment	All strategic sites key to the delivery of the plan have been subject to greater evide
	identified Strategic Sites have	regarding the	their delivery, including schematic frameworks, phasing details, key transpo
	environmental constraints. There are also	deliverability of	requirements, design parameters, s106 requirements, infrastructure and costs. T
	significant infrastructure improvements and	proposed	degree of confidence that the sites included within the Deposit Plan are realistically
	works required to facilitate developments	strategic sites and	full plethora of associated development requirements, infrastructure provision
	which would likely restrict the timing of the	a proposal to	necessary to deliver high-quality new communities.
	delivery of these sites until later in the plan	allocate 312.C1 to	
	period. It is therefore considered that the	enhance flexibility	Moreover, an appropriate flexibility allowance (10%) has been embedded into the D
	Deposit Draft RLDP must allow for some		which is clearly set out in the Housing Trajectory Background Paper. The flexibility a
	flexibility in the likely event that the		that there may be certain specific circumstances, unknown at the plan making sta
	proposed strategic sites will not deliver		sites, notwithstanding the robust frontloading of site delivery evidence. This is a large
	quickly, nor at the quantum anticipated -		specifically to enable the Replacement LDP's housing requirement to remain comfor
	and that the remedy to this would be to		that a strategic site fails to come forward as anticipated at this point of plan prepa
	allocate a number of sustainable, edge of		
L		1	

vidence requirements to support sport corridors, critical access a. This process provides a high ally deliverable, considering the on and placemaking principles

e Deposit Plan and the basis for ty allowance recognises the fact stage, that delay the delivery of arge flexibility allowance, chosen infortably deliverable in the event eparation. With a 10% flexibility

	settlement allocations which can be shown as deliverable and viable in the short term, such as Land to the East of Dan-y-graig, Porthcawl (Candidate Site Reference 312.C1) so that they can absorb the shortfall in housing land supply in the early part of the plan period triggered by the likely underperformance of many of the strategic sites.		allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable throug a significant unforeseen scenario, such as non-delivery of a strategic site, should of The trajectory was prepared initially through close dialogue with the respective seffective collaboration and involvement with a range of stakeholders at a Stake documented within the Housing Trajectory Background Paper, there were r disagreement on the completion figures or the timing and phasing of sites in the p sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposal to include Candidate Site 312.C1 is not supported and is a Strategy. The total level of housing provision within the Deposit Plan is set ap allowance to ensure delivery of the housing requirement, taking into account the po
136 6	The growth and spatial strategies are interlinked and Llanmoor supports the spatial strategy to deliver development within or on the periphery of sustainable urban areas and the delivery of growth in the Regeneration Growth Area (RGAs) and Sustainable Growth Areas (SGAs) which	Re-proportioning of strategic growth away from the grouped settlement of 'Pyle, Kenfig Hill and North	unforeseen issues in accordance with the Development Plans Manual. 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 to establish hierarchy. Based upon the consideration of a comprehensive range of variables sus to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pen Settlement of 'Pyle, Kenfig Hill and North Cornelly'.
	are the main focus of planned development. As recognised within the Background Paper to the Spatial Strategy, growth should be directed towards settlements and settlement edges in recognition of their position in the settlement hierarchy.	Cornelly' and towards Bridgend	Whilst Pyle, Kenfig and North Cornelly was not identified as a growth area in the e spatial strategy is being proposed for the Replacement LDP. The basis for this str Spatial Strategy Background Paper and it is considered the best option to align with Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP Strategy is considered most conducive to accommodating the level of growth identi Options Background Paper and also delivering this growth through sustainable pa accord with the Planning Policy Wales' placemaking principles. It will maximise aff
	More specifically, Llanmoor supports the apportionment of sustainable growth at Bridgend as the Primary Key Settlement as the primary focus of residential		high-need areas, promote viable sustainable development, enable delivery of sign sites in accordance with the site search sequence and seek to minimise pressure subject to site-specific assessment.
	development. Table 6 sets out the Spatial Distribution of Housing and Employment 2018-2033 and shows the requirement for new housing allocations being spatially distributed as follows:		Each candidate site has been assessed against the criteria in the Candidate Site which was previously consulted upon (See Appendix 13 – Candidate Sites Assess Stage 2 detailed assessment, sites were examined based on any specific issues t deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepar technical supporting studies to demonstrate the site's deliverability, sustainability and
	Regeneration Growth Areas – Maesteg (Main Settlement – Tier 2): 685 units (7%)		detailed assessment, only those sites deemed appropriate were included for allocat The level of growth apportioned to Pyle, Kenfig Hill and North Cornelly is unequ Settlement Hierarchy, Spatial Strategy and LHMA. Moreover, the proposed allocat
	<ul> <li>Porthcawl (Main Settlement – Tier 2):</li> <li>1,277 units (14%)</li> </ul>		supported with comprehensive, robust technical and viability evidence to demonstration and deliverable. This is documented within the Candidate Site Assessment.
	Sustainable Growth Areas – Bridgend (Primary Key Settlement – Tier 1): 4,190 units 46%		The total housing provision, and spatial distribution thereof, has also been subjuent analysis to enable development of the housing trajectory. The trajectory was preper dialogue with the respective site-promoters, followed by effective collaboration and stakeholders at a Stakeholder Group Meeting. As documented within the Housing Tratement on the completion figures or the statement of the statement of the completion figures or the statement of

ughout the plan period even if occur.

e site-promoters, followed by keholder Group Meeting. As no outstanding matters of plan period (including those on of the Stakeholder Group

s also contrary to the Spatial appropriately with a flexibility potential for non-delivery and

Iready benefit from significant o enabling transit orientated blish a sustainable settlement ustainable growth is proposed encoed and with the grouped

e existing LDP, an alternative strategy is detailed within the th the Vision and also the Key DP is seeking to address. The ntified in the Strategic Growth patterns of development that affordable housing delivery in gnificant remaining brownfield ure on BMV agricultural land,

tite Assessment Methodology sment Report (2022)). During s they raised in terms of their essibility, physical character, pare and submit a number of and suitability. Proceeding this cation in the Deposit Plan.

quivocally consistent with the cation (Land East of Pyle) is rate that the site is both viable

bject to site-specific phasing repared initially through close id involvement with a range of Trajectory Background Paper, he timing and phasing of sites

	<ul> <li>Pencoed (Main Settlement – Tier 2): 843</li> <li>units 9%</li> </ul>		in the plan period (including those sites with planning permission and new hou conclusion of the Stakeholder Group Meeting.
	<ul> <li>Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area (Main Settlement Tier 2) 1,190 units 13%</li> </ul>		For these reasons, the proposal to re-proportion strategic growth away from the g Kenfig Hill and North Cornelly' and towards Bridgend is not supported.
	Outside Regeneration Growth Areas and Sustainable Growth Areas		
	<ul> <li>Valleys Gateway (Main Settlement – Tier</li> <li>3): 675 units 7%</li> </ul>		
	- Local Settlements (Tier 3): 347 units (4%)		
488	Llanmoor retain the view that over 1,000 units attributed to the grouped settlements of Pyle, Kenfig and North Cornelly is unduly large given the lack of historic delivery of housing in these disparate locations. Llanmoor consider that a reduction of the planned housing growth at Pyle, Kenfig Hill and North Cornelly and increasing the housing numbers at Bridgend would assist in meeting the objectives of the Welsh Government's DPM which requires plans to be sustainable, deliverable and viable. These are promises made with every development and never comes to fruition. Usually stop short of building services to support development. Shortage of doctors etc have been blamed for not building the services.	Concerns regarding infrastructure	Comments noted. The plan preparation has involved the assessment of 171 sites. Ea assessed against the criteria in the Candidate Site Assessment Methodology which upon (See Appendix 13 – Candidate Sites Assessment Report (2022)). During Sta sites were examined based on any specific issues they raised in terms of their deli neighbouring land uses, existing use(s), accessibility, physical character, envir opportunities. Site promoters were asked to prepare and submit a number of tech
			demonstrate the site's deliverability, sustainability and suitability. Proceeding this those sites deemed appropriate were included for allocation in the Deposit Plan. In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been 37). The IDP provides a single schedule of all necessary infrastructure without allocated sites for the anticipated quantum of proposed housing/employment uses when the proceed. Such infrastructure includes transport, education, health, environment
			addition to community and cultural infrastructure. The Council have also been engaging with Cwm Taf Morgannwg University Health E Replacement LDP process. Early meetings were held to ensure the level and sp proposed was clarified to help facilitate alignment of service provision. As part of Sta Assessment, the health board amongst other consultation bodies were invited to pr of those sites identified as suitable for future development and possible allocation in the Council cannot ultimately control provision of healthcare services, close working rela- be maintained with Cwm Taf Morgannwg University Health Board. This will be key to as site allocations with the Deposit Plan progress.

ousing allocations) following

grouped settlement of 'Pyle,

Each candidate site has been hich was previously consulted Stage 2 detailed assessment, leliverability, general location, hvironmental constraints and echnical supporting studies to his detailed assessment, only

een produced (See Appendix ut which the development of s within the plan period could ental management, utilities in

a Board from the outset of the spatial distribution of growth Stage 3 of the Candidate Site provide comments in respect n the Deposit LDP. Whilst the elationships will continue and to service provision planning

516	I'd have to see the map to have a better idea of what you are concocting. As for "The spatial strategy has been formulated to help realise the regeneration aspirations and priorities of the council" - wrong. The council is elected to do our bidding - not impose their ideas on us. Look up the definition of democracy then start over with your plans with your principles corrected.	I'd have to see the map to have a better idea of what you are concocting. The council is elected to do our bidding - not impose their ideas on us.	Comments noted. The Deposit Plan has been prepared in accordance with Wels Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and underpinned by robust evidence to ensure that plans are effective and deliverable ar as defined in national policy set out in Planning Policy Wales (PPW). A such, the Deposit Plan has been underpinned by the identification of the most ap growth and housing provision, all of which have been based upon well informed, regarding need, demand and supply factors (See Appendix 42 – Background F Strategic Growth Options). A range of growth scenarios across the whole Replace analysed and discussed within the Strategic Growth Options Background Paper. T
			County Borough's demographic situation is likely to change from 2018-2033 and in response for the Replacement LDP. As such the Replacement LDP identifies an a to enable a balanced level of housing and employment provision that will achieve su support existing settlements and maximise viable affordable housing delivery.
			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 brownfield on the delivery of the brownfield regeneration allocations identified in the exist Maesteg and the Llynfi Valley are still denoted as regeneration priorities th 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. Hower success in delivering development on brownfield regeneration opportunities remaind deliverable sites (including some greenfield sites) are therefore required to implementation in high need areas and ensure the County Borough's future housing required in the site search areas and ensure the County Borough's future housing required to implementation.
			The Replacement LDP apportions sustainable growth towards settlements that alr services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See A sustainable settlement hierarchy. Based upon the consideration of a compre- sustainable growth will be appropriately directed towards the Main Settlements of E with 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 co 13 – Candidate Sites Assessment Report (2022)). During Stage 2 detailed asses based on any specific issues they raised in terms of their deliverability, general locat existing use(s), accessibility, physical character, environmental constraints and of 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.
			All allocations are shown on the Proposals Map.
707	The Spatial strategy is all very well when talking about regeneration but the reality of the times is that very few businesses want to develop themselves in the 'back end of	Concerns relating to employment / Strategic Allocation PLA1:	Comments noted. The Deposit Plan has been prepared in accordance with Welsl Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and underpinned by robust evidence to ensure that plans are effective and deliverable ar as defined in national policy set out in Planning Policy Wales (PPW).
	beyond'. Stating that the strategy is to		

sh Government Development revise a development plan, nd contribute to placemaking,

ppropriate scale of economic evidence based judgements Paper 2: Preferred Strategy ement LDP period have been This has considered how the nformed the most appropriate appropriate plan requirement ustainable patterns of growth,

y Options Background Paper nent of land within or on the Id sites. It continues to focus ting LDP, hence, Porthcawl, nrough 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 ement SP1, deliver affordable irements 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 nt, only those sites deemed

sh Government Development revise a development plan, nd contribute to placemaking,

ensure new development can come forward is easy but DOING it is something else. I am no businessman and wouldn't know where to start but having offices full of people creating these STATEMENTS OF DREAMS but having no more idea than I have in how to achieve them does come across as looking a bit silly. Businesses want to be in or around large towns and cities with easy access to main roads/railways. The valley areas communities were built on coal and little	ront and housing provision, all of which have been based upon well informed, evidence barneed, demand and supply factors (See Appendix 42 – Background Paper 2: Preferred Options). A range of growth scenarios across the whole Replacement LDP period discussed within the Strategic Growth Options Background Paper. This has consorted by a demographic situation is likely to change from 2018-2033 and inform response for the Replacement LDP. As such the Replacement LDP identifies an ap to enable a balanced level of housing and employment provision that will achieve sust Over 30% of the County Borough's population is projected to be aged 60+ by 2033. growth across this age group, there is likely to be a broad reduction in local economic does not facilitate sustainable levels of economic growth that will attract and retain economic therefore seeks to deliver sustainable forms of growth that will attract and retain economic
am no businessman and wouldn't know where to start but having offices full of people creating these STATEMENTS OF DREAMS but having no more idea than I have in how to achieve them does come across as looking a bit silly. Businesses want to be in or around large towns and cities with easy access to main roads/railways. The valley areas communities were built on coal and little	<ul> <li>need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferred Options). A range of growth scenarios across the whole Replacement LDP period discussed within the Strategic Growth Options Background Paper. This has con 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 ap to enable a balanced level of housing and employment provision that will achieve sust</li> <li>Over 30% of the County Borough's population is projected to be aged 60+ by 2033. growth across this age group, there is likely to be a broad reduction in local econom does not facilitate sustainable levels of economic growth to offset this phenomenom therefore seeks to deliver sustainable forms of growth that will attract and retain economic</li> </ul>
where to start but having offices full of people creating these STATEMENTS OF DREAMS but having no more idea than I have in how to achieve them does come across as looking a bit silly. Businesses want to be in or around large towns and cities with easy access to main roads/railways. The valley areas communities were built on coal and little	Options). A range of growth scenarios across the whole Replacement LDP period discussed within the Strategic Growth Options Background Paper. This has consorresponse for the Replacement LDP. As such the Replacement LDP identifies an ap to enable a balanced level of housing and employment provision that will achieve sust Over 30% of the County Borough's population is projected to be aged 60+ by 2033. growth across this age group, there is likely to be a broad reduction in local economic does not facilitate sustainable levels of economic growth to offset this phenomenomic therefore seeks to deliver sustainable forms of growth that will attract and retain economic growth grow
people creating these STATEMENTS OF DREAMS but having no more idea than I have in how to achieve them does come across as looking a bit silly. Businesses want to be in or around large towns and cities with easy access to main roads/railways. The valley areas communities were built on coal and little	discussed within the Strategic Growth Options Background Paper. This has con 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 ap to enable a balanced level of housing and employment provision that will achieve sust Over 30% of the County Borough's population is projected to be aged 60+ by 2033. growth across this age group, there is likely to be a broad reduction in local econom does not facilitate sustainable levels of economic growth to offset this phenomenon therefore seeks to deliver sustainable forms of growth that will attract and retain economic
DREAMS but having no more idea than I have in how to achieve them does come across as looking a bit silly. Businesses want to be in or around large towns and cities with easy access to main roads/railways. The valley areas communities were built on coal and little	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 ap to enable a balanced level of housing and employment provision that will achieve sust Over 30% of the County Borough's population is projected to be aged 60+ by 2033. growth across this age group, there is likely to be a broad reduction in local econom does not facilitate sustainable levels of economic growth to offset this phenomenon therefore seeks to deliver sustainable forms of growth that will attract and retain economic
have in how to achieve them does come across as looking a bit silly. Businesses want to be in or around large towns and cities with easy access to main roads/railways. The valley areas communities were built on coal and little	response for the Replacement LDP. As such the Replacement LDP identifies an ap to enable a balanced level of housing and employment provision that will achieve sust Over 30% of the County Borough's population is projected to be aged 60+ by 2033. growth across this age group, there is likely to be a broad reduction in local econom does not facilitate sustainable levels of economic growth to offset this phenomeno therefore seeks to deliver sustainable forms of growth that will attract and retain econom
across as looking a bit silly. Businesses want to be in or around large towns and cities with easy access to main roads/railways. The valley areas communities were built on coal and little	to enable a balanced level of housing and employment provision that will achieve sust Over 30% of the County Borough's population is projected to be aged 60+ by 2033. growth across this age group, there is likely to be a broad reduction in local econom does not facilitate sustainable levels of economic growth to offset this phenomenon therefore seeks to deliver sustainable forms of growth that will attract and retain economic
want to be in or around large towns and cities with easy access to main roads/railways. The valley areas communities were built on coal and little	Over 30% of the County Borough's population is projected to be aged 60+ by 2033. growth across this age group, there is likely to be a broad reduction in local econom does not facilitate sustainable levels of economic growth to offset this phenomenon therefore seeks to deliver sustainable forms of growth that will attract and retain economic
cities with easy access to main roads/railways. The valley areas communities were built on coal and little	growth across this age group, there is likely to be a broad reduction in local econom does not facilitate sustainable levels of economic growth to offset this phenomenon therefore seeks to deliver sustainable forms of growth that will attract and retain economic
roads/railways. The valley areas communities were built on coal and little	growth across this age group, there is likely to be a broad reduction in local econom does not facilitate sustainable levels of economic growth to offset this phenomenon therefore seeks to deliver sustainable forms of growth that will attract and retain economic
	does not facilitate sustainable levels of economic growth to offset this phenomeno therefore seeks to deliver sustainable forms of growth that will attract and retain economic
also but and in dead. These people who	•
else - but coal is dead! Those people who	within the County Darough As institud within the Others and Oracuth Oracian Device
are creating these ideas don't seem to	within the County Borough. As justified within the Strategic Growth Options Backgrour
understand the the general populace don't	and Sustainable Growth Strategy is largely driven by households within the 35-44
need to be told what is needed and where -	projected to support an increase in people in workplace based employment over
they already know. What they need is an	accommodated through provision of up to 7,500 additional jobs.
official body to ACT on getting industry in to	
the area and let them know if they've	A positive employment land response is necessary to achieve an equilibrium betwe
achieved anything - not just write about it	skilled labour force and job opportunities in order to stimulate the local to regional eco
At present, it seems like the only thing that	Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 2
the 'responsible authority' can come up with	labour force boost alongside other employment trends including past take up of en
is 'build more houses' in the hope that jobs	based economic forecasts. The resulting evidence base has informed the scale and
and business will follow. That's a pipe	need and the land best suited to meet that need over the plan period in the context
dream. As far as Porthcawl is concerned -	and Technical Advice Note 23, justified further in the Employment Background Pape
destroying its attraction as a tourist resort is	
NOT regeneration. The shopping area is	Whilst it is beyond the scope of the LDP to guarantee that employers will come to the a
usually very busy on most days and	SP11 by allocating new employment land for development. Policy ENT2 supports
extremely busy when the weather is	employment function of existing business and employment sites. This will enable a
moderate to fine (unlike Bridgend where the	come forward.
town centre is DEAD). BCBC should be	
concentrating its efforts on sorting out	The imbalance and shortage of employment land in Porthcawl is acknowledged compared
Bridgend not ruining what is a very	within the County Borough, although it is likely that the majority of employment in the
successful and classic seaside resort.	provided through planned growth in the commercial, leisure and tourism sectors.
Experiments with pedestrianisation and	
changing road systems around Bridgend	As part of the proposed allocation of Porthcawl Waterfront, development will k
has made it a ghost town which looks	requirements including masterplan development principles and placemaking principles
dilapidated and dirty (Swansea City has	PLA1 – Page 63). The provision of new residential units, including affordable dwellin
done the same) not pleasant to visit - now	of other vital regeneration requirements comprising flood defences, public open space
the gem that is Porthcawl will go the same	travel links plus education, retail and community facility provision.
way. BCBC should heed the American	
terminology - if it ain't broke don't fix it!	A Placemkaing Strategy has been developed and produced of which provides the
	broader vision for Porthcawl; which aims to create a premier seaside resort of region
	comprehensive regeneration of this key waterfront site. It proposes a sustainable
	complementary land uses across the area. It also proposed to retain and improve up
	space within Griffin Park, whilst creating significant new areas of open space along the
	with high quality active travel routes that traverse the entire site between the harbour
	development of the waterfront in this manner will improve the attractiveness of the t
	work, enhance the vibrancy of the Town Centre and deliver wider socio-economic ber
	settlement of Porthcawl to thrive and prosper.

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

33. With absolute and relative omic activity rates if the Plan enon. The Replacement LDP onomically active households ound Paper, the Regeneration 44 age group. This growth is over the Plan period, to be

ween new homes, a growing conomy. The 2019 Economic ix 15) analysed this projected employment land and sector nd distribution of employment ext of Planning Policy Wales per, and set out in SP11.

e area, Policy ENT1 supports ts SP11 by safeguarding the e a range of different sites to

npared with other settlements the town will continue to be

I be subject to site-specific inciples (See Deposit Policy lings, will enable the delivery ace, leisure, enhanced active

the framework to deliver the ional significance through the le distribution and variety of upon areas of attractive open g the seafront, supplemented our and Trecco Bay. Physical e town as a place to live and benefits that allow the broader

	1		· · · · · · · · · · · · · · · · · · ·
779	I'd emphasis that any regeneration or growth areas should be designed to make sure that as many facilities such as education, leisure and retail, is available without having to travel to areas outside of their communities. I think this is especially important given the fact that working from home will be a long term requirement for many more people. It makes sense as a	Regeneration or growth areas should be designed to make sure that as many facilities such as education, leisure and retail, is available without	In terms of Salt Lake, development will include a new food store, residential (inclusporting commercial uses and leisure. With regards to leisure, an area north of the will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facin site could provide an alternative form of leisure/tourism/commercial, year roum Furthermore, the comprehensive enhancement of the Eastern Promenade with not better landscaping provides an exciting opportunity to create an area that will not on also act, with others, to set a quality benchmark which will also need to be achieved Mixed-use development will be encouraged throughout the development. Commercial on the ground floor if there is market demand for such uses. Retail uses, restaurants a encouraged. This mix of uses will help bring life and vitality during the day and into the Sandy Bay will accommodate public open space, residential, education provision a open space, Policy PLA1 requires development of Porthcawl Waterfront to incorpora Outdoor Recreation Facilities of which are to be delivered in accordance with PRecreation Facilities and New Housing Development Supplementary Planning Guida Additionally, there are plans for creating new facilities at Cosy Corner, including commercing employment opportunities. The plans for Cosy Corner include an all-new stwhich will feature new premises suitable for retail and start-up enterprises. The count meeting space for community use, a parade square for the Sea Cadets and an offic well as changing facilities for users of the nearby marina. If funding allows, plans a of providing comfortable outdoor shelter from rain and the sun. Comments noted. The Spatial Strategy (See Appendix 43 – Background Paper 3) pri land within or on the periphery of sustainable urban areas, primarily on previously de continues to focus on the delivery of the brownfield exelopment and evelopment settlements accords with the site-search sequence outlined in Planning Policy Wa developmental pressure on Best and Most Versatile (BMV) agric
	long term sustainable goal.	having to travel to areas outside of their communities	services, facilities and employment opportunities and are most conducive to e development. As such, a Settlement Assessment has been undertaken (See Ap sustainable settlement hierarchy. Based upon the consideration of a comprehens Replacement LDP will maintain Porthcawl's role as a Main Settlement capable of s growth, demonstrating capacity for sustainable growth based on its accessibility, a employment provision in the context of its existing population base.
847	NO	No changes proposed	Comments noted.
996	No	No changes proposed	Comments noted.
329	in my area nantymoel my site clear meets PPG requirements for a extension to the ldp	Nantymoel meets planning policy guidance requirements for an extension to the ldp	Comments noted. All Candidate Sites were subject to a detailed assessment to conformed with the Preferred Strategy and, if so, whether they were deliverable. Site hectares (including 329.C1) are too small for individual allocation and were there Settlement Boundary Review (See Appendix 38). The Council has reviewed all settle County Borough to determine if they are still appropriate in light of the Replacement L constitute appropriate amendments to existing boundaries. This included candidate s

ncluding affordable housing), the harbour within Salt Lake cility is not delivered then the und, wet-weather attraction. new buildings, facilities and only enhance the frontage but ed elsewhere.

ercial units will be considered s and cafes will be particularly the evening.

and commercial. In terms of rate Green Infrastructure and Policy COM10 and Outdoor dance.

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

prioritises the development of developed brownfield sites. It ed in the existing LDP, hence, s through their designation as ent opportunities within these Vales and seeks to minimise

ready benefit from significant enabling transit orientated Appendix 19) to establish a nsive range of variables the f supporting regeneration-led availability of amenities and

to determine whether they ites measuring less than 0.25 refore assessed through the tlement boundaries within the t LDP Strategy and / or would s site 329.C1 (rear of Osborne

			Terrace, Nantymoel). As detailed within the Review, the Replacement LDP Strategy of as a location for strategic growth. Candidate site 329.C1 was considered to represent to the existing settlement of Nantymoel into the open countryside. Therefore, following Replacement LDP has not proposed altering the defined settlement boundary of Nantymoel into the open countryside.
108 5	developments that can have assisted with this strategy and a number of ongoing developments which will assist in meeting these objectives. However the issue here is the destruction of land surrounding Laleston and the lanes between bryntirion and Laleston. This will also cause unwanted congestion in the area and a significant increase in traffic through a conversation	to overdevelopment within the borough and impact of congestion on the conservation area.	analysed and discussed within the Strategic Growth Options Background Paper. The County Borough's demographic situation is likely to change from 2018-2033 and information response for the Replacement LDP. As such the Replacement LDP identifies an approximate to enable a balanced level of housing and employment provision that will achieve sus support existing settlements and maximise viable affordable housing delivery.
	area.		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 existin Maesteg and the Llynfi Valley are still denoted as regeneration priorities through 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. However success in delivering development on brownfield land in other settlements (notably Gateway), there are limited further 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 alre services, facilities and employment opportunities and are most conducive to a development. As such, a Settlement Assessment has been undertaken (See App sustainable settlement hierarchy. Based upon the consideration of a compreh sustainable growth will be appropriately directed towards the Main Settlements of Br with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
			The plan preparation has involved the assessment of 171 sites, the vast majority of candidate site has been assessed against the criteria in the Candidate Site Assessment previously consulted upon (See Appendix 13 – Candidate Sites Assessment Report detailed assessment, sites were examined based on any specific issues they deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepart technical supporting studies to demonstrate the site's deliverability, sustainability and detailed assessment, only those sites deemed appropriate were included for allocation.
			As part of the proposed allocation of Land West of Bridgend, development will requirements including a range of placemaking principles and masterplan developm Policy PLA3 – Page 71). Green Infrastructure and Outdoor Recreation Facilities will in accordance with Policy COM10 and Outdoor Recreation Facilities and Ne Supplementary Planning Guidance. The proposed allocation will also be required to corridor between the site and Laleston to retain the separate identities and character preventing coalescence.

y does not identify Nantymoel ant an inappropriate extension wing the Review, the Deposit lantymoel to include this site. opropriate scale of economic evidence based judgements Paper 2: Preferred Strategy ement LDP period have been This has considered how the nformed the most appropriate appropriate plan requirement ustainable patterns of growth,

y Options Background Paper nent of land within or on the ld sites. It continues to focus ting LDP, hence, Porthcawl, nrough their designation as ent opportunities within these Vales and seeks to minimise ever, given the existing LDP's oly Bridgend and the Valleys aining. Additional viable and ment SP1, deliver affordable irements can be realised.

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

of which are greenfield. Each ment Methodology which was port (2020)). During Stage 2 ey raised in terms of their ssibility, physical character, are and submit a number of nd suitability. Proceeding this ation in the Deposit Plan.

ill be subject to site-specific ment principles (See Deposit ill be required to be delivered New Housing Development to maintain a strategic green er of these settlements whilst

874	We welcome Strategic Objection 1's aim, to	Support for	Comments noted.
	promote Bridgend as the Primary Key Settlement of the County Borough where major employment, commercial and residential development is focused	Spatial Strategy	
223	<ul> <li>The growth and spatial strategies are intertwined. Llanmoor supports the spatial strategy in terms of the focus to deliver development within or on the periphery of sustainable urban areas and the delivery of growth in in Regeneration Growth Areas (RGAs) and Sustainable Growth Areas (SGAs) which are the main focus of planned development. As recognised within the Background Paper to the Spatial Strategy, growth should be channelled towards settlements in recognition of their position in the settlement hierarchy, a position which Llanmoor agree.</li> <li>More specifically, Llanmoor supports the apportionment of sustainable growth at Bridgend as the Primary Key Settlement within the County and for Bridgend to be the primary focus of residential development. Table 6 sets out the Spatial Distribution of Housing and Employment 2018-2033 and shows the requirement for new housing allocations being spatially distributed as follows:</li> <li>Regeneration Growth Areas         <ul> <li>Maesteg (Main Settlement – Tier 2): 685 units (7%)</li> <li>Porthcawl (Main Settlement – Tier 2): 1,277 units (14%)</li> </ul> </li> <li>Sustainable Growth Areas         <ul> <li>Bridgend (Primary Key Settlement – Tier 1): 4,190 units 46%</li> <li>Pencoed (Main Settlement – Tier 2): 843 units 9%</li> <li>Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area (Main Settlement Tier 2) 1,190 units 13%</li> </ul> </li> </ul>	strategic growth away from the grouped settlement of 'Pyle, Kenfig Hill and North Cornelly' and towards Bridgend.	The Replacement LDP apportions sustainable growth towards settlements that alres services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken to establis hierarchy. Based upon the consideration of a comprehensive range of variables sust to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pene Settlement of 'Pyle, Kenfig Hill and North Cornelly'. Whilst Pyle, Kenfig and North Cornelly was not identified as a growth area in the establist prategy is being proposed for the Replacement LDP. The basis for this str Spatial Strategy Background Paper and it is considered the best option to align with Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP Strategy is considered most conducive to accommodating the level of growth identit Options Background Paper and also delivering this growth through sustainable pa accord with the Planning Policy Wales' placemaking principles. It will maximise aff high-need areas, promote viable sustainable development, enable delivery of signi sites in accordance with the site search sequence and seek to minimise pressure subject to site-specific assessment. Each candidate site has been assessed against the criteria in the Candidate Site which was previously consulted upon (See Appendix 13 – Candidate Site Assessn Stage 2 detailed assessment, sites were examined based on any specific issues t deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepare technical supporting studies to demonstrate the site's deliverability, sustainability and detailed assessment, show apportioned to Pyle, Kenfig Hill and North Cornelly is unequisent and deliverability, sustainability and detailed assessment, and the set of the housing trajectory. The trajectory was precidiate were provised national stakeholders at a Stakeholder Group Meeting. As documented within the Housin

Iready benefit from significant o enabling transit orientated blish a sustainable settlement ustainable growth is proposed encoed and with the grouped

e existing LDP, an alternative strategy is detailed within the th the Vision and also the Key DP is seeking to address. The ntified in the Strategic Growth patterns of development that affordable housing delivery in gnificant remaining brownfield ure on BMV agricultural land,

tite Assessment Methodology sment Report (2020)). During s they raised in terms of their essibility, physical character, pare and submit a number of and suitability. Proceeding this cation in the Deposit Plan.

quivocally consistent with the cation (Land East of Pyle) is rate that the site is both viable

bject to site-specific phasing repared initially through close ad involvement with a range of Trajectory Background Paper, he timing and phasing of sites nousing allocations) following

grouped settlement of 'Pyle,

	Outside Regeneration Growth Areas and Sustainable Growth Areas		
	<ul> <li>Valleys Gateway (Main Settlement – Tier 3): 675 units 7%</li> </ul>		
	<ul> <li>Local Settlements (Tier 3): 347 units (4%)</li> </ul>		
	Llanmoor retain the view that over 1,000 units attributed to the grouped settlements of Pyle, Kenfig and North Cornelly is substantial given the lack of delivered housing in past years in these locations. Notwithstanding past delivery, developer interests are likely to remain tentative when sale values are not as high as competing settlements such as Bridgend, Pencoed and Porthcawl and impacts of COVID in terms of housing delivery backlog and heightened need. Llanmoor therefore remain of the view that reducing the planned housing growth at Pyle, Kenfig Hill and North Cornelly and increasing the housing numbers at Bridgend would assist in meeting the objectives of the Welsh Government's DPM which requires plans to be deliverable and viable.		
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
	We support the identification of Bridgend as the 'Primary Key Settlement'. We also welcome the acknowledgement in the supporting text (Paragraph 4.3.3) that Bridgend has the highest propensity to accommodate sustainable growth in a manner that will both support and build on its success as a regional employment, commercial and service centre.	Support identification of Bridgend as Primary Key Settlement Concern that identification of Primary Shopping Area does not affect ability to	Policy ENT6 of the Replacement LDP identifies Southside (incorporating land at the as a key regeneration site where refurbishment and regeneration proposals will be variety of different complementary uses. The LDP seeks to improve the performance enabling measures identified in the Bridgend Town Centre Masterplan (2022). The quality of the town centre environment and promote more flexibility by increasing the and social facilities on offer. Encouraging a greater range of uses will help to reduce UK average levels. Alongside this the masterplan identifies town centre wide end including green and blue infrastructure improvements, active travel links, new public distancing, tree planting, heritage trails and building character and street art improve The Replacement LDP acknowledges that Town centres need to maintain their diverse.
	notes that Bridgend Town Centre is at the top of the retail and commercial hierarchy of the County Borough – being the only Sub- Regional Centre in the County Borough. The recognition of the important role played by Bridgend Town Centre is welcomed.	attract new uses, previously developed land and/or underutilised sites should be prioritised (including new	vitality and viability, and the range and variety of shops and services has changed evolve. However, there is a need to ensure that commercial centres do not lose the to the extent that they can no longer function as viable shopping centres. Accordin a balance between retailing and non-retailing uses in commercial centres to ensure enhance the vitality and viability of those centres. Policy ENT7 recognises that the the County Borough's town centres are in need of particular protection from comper frontages can complement ongoing public realm pedestrianisation and town centres which seek to increase the retail offer of the centres in a pleasant, attractive environment of the centres in a pleasant.

the Bridgend Shopping Centre) be encouraged incorporating a rmance of the Town Centre by . This will seek to improve the the range of community, leisure, ice vacancy rates, which exceed e environmental improvements bublic spaces to facilitate social provements.

iversity if they are to retain their of over time and will continue to heir 'critical mass' of retail units dingly, there is a need to strike sure the optimum mix, and thus the Primary Shopping Areas of opeting uses. Primary shopping centre regeneration objectives, ironment.

	Paragraph 4.3.8 states that the Replacement LDP will enable the ongoing enhancement of Bridgend Town Centre through continued conservation-led environmental improvements. It goes on to state that it will also consolidate retail uses along primary frontages, expand the range of uses within the town centre (notably increasing commercial leisure facilities) and facilitate redevelopment of prominent vacant buildings. This will include extending the primary shopping area boundary to include the redeveloped Bridgend Shopping Centre.	residential development on suitable brownfield sites within town centres)	The Spatial Strategy of the Replacement LDP prioritises the development of land with primarily on previously developed brownfield sites. It continues to focus on the regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg a denoted as regeneration priorities through their designation as Regeneration Grownitment to brownfield development opportunities within these settlements ac sequence outlined in Planning Policy Wales and seeks to minimise developmental Versatile (BMV) agricultural land. Growth is apportioned towards settlements that alres services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See Agricultationable settlement hierarchy. Based upon the consideration of a compreh sustainable growth will be appropriately directed towards the Main Settlements of Brwith the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
	Our client owns and manages the Bridgend Shopping Centre. Whilst our client welcomes the recognition that the centre forms an important part of the town centre, the Replacement LDP must provide sufficient flexibility to ensure its continued success in the short and medium/long term. In the short term, it is important that the identification of a large part of the centre within the Primary Shopping Area does not temper the ability to attract new uses and maintain low vacancy rates.		
	In the medium/long term, the Replacement LDP must support opportunities to redevelop the centre as part of the comprehensive regeneration of the wider area. The Replacement LDP must ensure that the use of suitable and sustainable previously developed land and/or underutilised sites is prioritised when developing its spatial strategy. This should include facilitating opportunities for new residential development on suitable brownfield sites within key town centres (in particular Bridgend Town Centre).		
400	Jehu supports the spatial strategy set out in Policy SP1 in terms of delivering a Regeneration and Sustainable Urban Growth Led Strategy (Option 4) as recommended in the Spatial Strategy Options Background Paper. In this regard, it is noted that Option 4 builds on the successes of the existing LDP and provides enough flexibility to address elements that	No changes proposed – support the Spatial Strategy and allocation of Land South East of Pont Rhyd-y- cyff (COM 1(3)).	Comments noted

vithin sustainable urban areas, ne delivery of the brownfield g and the Llynfi Valley are still Growth Areas. The ongoing accords with the site-search al pressure on Best and Most already benefit from significant o enabling transit orientated Appendix 19) to establish a ehensive range of variables Bridgend and Pencoed along

	have underperformed i.e. Maesteg and the Llynfi Valley. Jehu agree Llynfi Valley should be a regeneration priority through its designation as a Regeneration Growth Area (RGA) within the background paper. In respect of the spatial distribution of housing 2018-2033, Jehu supports the Llynfi Valley being identified as a Main Settlement, Tier 3 for delivering housing, specifically 675 units, outside Regeneration Growth Areas (RGAs) and Sustainable Growth Areas (SGAs) as set out within Table 6. It is noted that moderate housing need was identified in Maesteg and the Llynfi Valley within the Local Housing Market Assessment (LHMA) (2021), as was the need to diversify the dwelling stock within Valleys Settlements. Jehu agree that the spatial strategy adopted by the RLDP provides the opportunities to address these shortfalls with land east of Bridgend Road forming part of the supply.		
554	Jehu acknowledge that the Plan-Wide Viability Assessment and site-specific viability testing demonstrated that sites within these areas could support significant nil-grant affordable housing contributions (referenced in COM2). The strategy is therefore considered most appropriate to maximise delivery of affordable housing in high-need areas as identified by the LHMA, whilst enabling sustainable forms of development that meet the LDP Objectives, minimise pressure on BMV agricultural land and provide scope to address existing infrastructure capacity issues. How many houses will be built		Policy SP1 Regeneration and Sustainable Growth Strategy (See Appendix 1 – Dep makes provision for 9,207 new homes to meet a housing requirement of 7,575 dv period from 2018 to 2033.
287	Support - please see covering letter submitted	proposed –	Comments noted
308	The growth and spatial strategies are interlinked and Llanmoor supports the spatial strategy to deliver development within or on the periphery of sustainable urban areas and the delivery of growth in the Regeneration Growth Area (RGAs)	grouped settlement of	The Replacement LDP apportions sustainable growth towards settlements that all services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken to estable hierarchy. Based upon the consideration of a comprehensive range of variables su to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Persettlement of 'Pyle, Kenfig Hill and North Cornelly'.

Deposit Local Development Plan) dwellings over the 15 year LDP

t already benefit from significant to enabling transit orientated tablish a sustainable settlement s sustainable growth is proposed Pencoed and with the grouped

and Sustainable Growth Areas (SGAs) which are the main focus of planned development. As recognised within the Background Paper to the Spatial Strategy, growth should be directed towards settlements and settlement edges in recognition of their position in the settlement hierarchy. More specifically, Llanmoor supports the apportionment of sustainable growth at Bridgend as the Primary Key Settlement	and North Cornelly' and towards Bridgend.	Whilst Pyle, Kenfig and North Cornelly was not identified as a growth area in the expatial strategy is being proposed for the Replacement LDP. The basis for this strates Spatial Strategy Background Paper and it is considered the best option to align with the Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP. Strategy is considered most conducive to accommodating the level of growth identified Options Background Paper and also delivering this growth through sustainable participations accord with the Planning Policy Wales' placemaking principles. It will maximise affect high-need areas, promote viable sustainable development, enable delivery of significates in accordance with the site search sequence and seek to minimise pressure subject to site-specific assessment.
as the primary focus of residential development. Table 6 sets out the Spatial Distribution of Housing and Employment 2018-2033 and shows the requirement for new housing allocations being spatially distributed as follows:		Each candidate site has been assessed against the criteria in the Candidate Site which was previously consulted upon (See Appendix 13 – Candidate Sites Assessment, Stage 2 detailed assessment, sites were examined based on any specific issues the deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepare technical supporting studies to demonstrate the site's deliverability, sustainability and detailed assessment, only those sites deemed appropriate were included for allocation.
Regeneration Growth Areas		
- Maesteg (Main Settlement – Tier 2): 685 units (7%)		The level of growth apportioned to Pyle, Kenfig Hill and North Cornelly is unequive Settlement Hierarchy, Spatial Strategy and LHMA. Moreover, the proposed allocat supported with comprehensive, robust technical and viability evidence to demonstrate
- Porthcawl (Main Settlement – Tier 2): 1,277 units (14%)		and deliverable. This is documented within the Candidate Site Assessment.
Sustainable Growth Areas – Bridgend (Primary Key Settlement – Tier 1): 4,190 units 46%		The total housing provision, and spatial distribution thereof, has also been subje analysis to enable development of the housing trajectory. The trajectory was prepa dialogue with the respective site-promoters, followed by effective collaboration and in stakeholders at a Stakeholder Group Meeting. As documented within the Housing Tra there were no outstanding matters of disagreement on the completion figures or the
<ul> <li>Pencoed (Main Settlement – Tier 2): 843 units 9%</li> </ul>		in the plan period (including those sites with planning permission and new hou conclusion of the Stakeholder Group Meeting.
<ul> <li>Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area (Main Settlement Tier 2) 1,190 units 13%</li> </ul>		For these reasons, the proposal to re-proportion strategic growth away from the gr Kenfig Hill and North Cornelly' and towards Bridgend is not supported.
Outside Regeneration Growth Areas and Sustainable Growth Areas		
<ul><li>Valleys Gateway (Main Settlement – Tier</li><li>3): 675 units 7%</li></ul>		
- Local Settlements (Tier 3): 347 units (4%)		
Llanmoor retain the view that over 1,000 units attributed to the grouped settlements of Pyle, Kenfig and North Cornelly is		

e existing LDP, an alternative strategy is detailed within the h the Vision and also the Key P is seeking to address. The ntified in the Strategic Growth patterns of development that affordable housing delivery in nificant remaining brownfield re on BMV agricultural land,

te Assessment Methodology sment Report (2020)). During a they raised in terms of their essibility, physical character, are and submit a number of nd suitability. Proceeding this ation in the Deposit Plan.

uivocally consistent with the cation (Land East of Pyle) is rate that the site is both viable

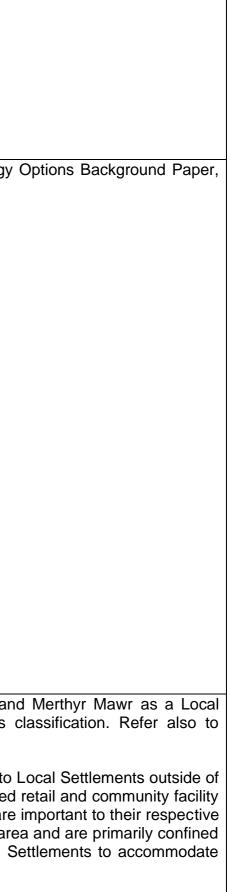
bject to site-specific phasing epared initially through close d involvement with a range of frajectory Background Paper, he timing and phasing of sites ousing allocations) following

grouped settlement of 'Pyle,

			-
	unduly large given the lack of historic		
	delivery of housing in these disparate		
	locations. Llanmoor consider that a		
	reduction of the planned housing growth at		
	Pyle, Kenfig Hill and North Cornelly and		
	increasing the housing numbers at		
	Bridgend would assist in meeting the		
	objectives of the Welsh Government's		
	DPM which requires plans to be		
	sustainable, deliverable and viable.		
400	Jehu supports the spatial strategy set out	None – support	Comments noted (refer to Spatial Strategy Options Background Paper and Candida
	in Policy SP1 in terms of delivering a	the Spatial	
	Regeneration and Sustainable Urban	Strategy and	
	Growth Led Strategy (Option 4) as	allocation of Land	
	recommended in the Spatial Strategy	South East of	
	Options Background Paper. In this regard,	Pont Rhyd-y-cyff	
	it is noted that Option 4 builds on the	(COM 1(3)).	
	successes of the existing LDP and		
	provides enough flexibility to address		
	elements that have underperformed i.e.		
	Maesteg and the Llynfi Valley. Jehu agree		
	Llynfi Valley should be a regeneration		
	priority through its designation as a		
	Regeneration Growth Area (RGA) within		
	the background paper.		
	In respect of the spatial distribution of		
	housing 2018-2033, Jehu supports the		
	Llynfi Valley being identified as a Main		
	Settlement, Tier 3 for delivering housing,		
	specifically 675 units, outside		
	Regeneration Growth Areas (RGAs) and		
	Sustainable Growth Areas (SGAs) as set		
	out within Table 6. It is noted that		
	moderate housing need was identified in		
	Maesteg and the Llynfi Valley within the		
	Local Housing Market Assessment		
	(LHMA) (2021), as was the need to		
	diversify the dwelling stock within Valleys		
	Settlements. Jehu agree that the spatial		
	strategy adopted by the RLDP provides		
	the opportunities to address these		
	shortfalls with land east of Bridgend Road		
	forming part of the supply. Jehu		
	acknowledge that the Plan-Wide Viability		
	Assessment and site-specific viability		
	testing demonstrated that sites within		
	these areas could support significant nil-		
	grant affordable housing contributions		
	(referenced in COM2). The strategy is		

date Assessment).

	therefore considered most appropriate to maximise delivery of affordable housing in high-need areas as identified by the LHMA, whilst enabling sustainable forms of development that meet the LDP Objectives, minimise pressure on BMV agricultural land and provide scope to address existing infrastructure capacity issues.		
1051	The landowners supports the spatial strategy set out in Policy SP1 in terms of delivering a Regeneration and Sustainable Urban Growth Led Strategy (Option 4) as recommended in the Spatial Strategy Options Background Paper. In this regard, it is noted that Option 4 builds on the successes of the existing LDP and provides enough flexibility to address elements that have underperformed. The landowners agree growth should be channelled towards Bridgend to reflect its position in the settlement hierarchy, the high levels of need for housing (including affordable housing) and its capacity to grow in a sustainable manner. The landowners support that the mixed use regeneration of Parc Afon Ewenni will support Bridgend's existing services whilst also delivering sustainable, transit orientated development that are grounded within the place making principles of the RLDP. In respect of the spatial distribution of housing 2018-2033, the landowners supports Bridgend being identified as a Primary Key Settlement, Tier 1 for delivering housing, specifically 4,190 units, within the Sustainable Growth Area (SGA) as set out within Table 6.	Strategy, Distribution of Housing and allocation of Parc Afon Ewenni (COM1(1)).	Comments noted (Refer to Growth Options Background Paper, Spatial Strategy Housing Trajectory Background Paper and Candidate Site Assessment).
253	BDW considers that Laleston should be recognised as part of the Bridgend Sustainable Growth Area given its functionality with Bridgend and the presence of a key active travel route Spatial Strategy Bridgend Sustainable Growth Area BDW is concerned that the Deposit Draft LDP does not acknowledge the functionality between Bridgend and Laleston and the role that Laleston could play in accommodating growth in the Bridgend Sustainable Growth Area. BDW	Sustainable Growth Area Boundary to include Laleston and expand the settlement boundary to include Candidate Site Ref: 347.C1.	The Settlement Assessment 2019, Revised 2021, clearly identifies Laleston and Settlement and significant growth in this vicinity would not accord with this of Background Paper 3: Spatial Strategy Options. Table 7 within the Deposit Plan clearly identifies the level of growth attributable to I Growth Areas. This reflects the fact that Local Settlements perform a more limited function, primarily serving their local residents. Whilst all services and facilities are hinterlands, those on offer in these settlements draw from a smaller catchment are to serving the more immediate population base. As such, the scope for Local Set significant development is more limited.



maintains that Laleston should form part of the Bridgend Sustainable Growth Area	The Candidate Site Assessment clearly states that Laleston is identified as a 'Lo development should be contained within the existing settlement boundary. The
and the settlement should not be	(347.C1) is located outside the existing settlement boundary and is therefore c
overlooked as a sustainable location for	unacceptable incursion into the open countryside, hence, this site is not propos
growth.	representor's proposal is not supported.
Representations were submitted in	
November 2018 by RPS on behalf of BDW	
to support the inclusion of land to the west	
of Laleston (Candidate Site Ref: 347.C1)	
for new housing in the replacement LDP.	
The representations presented three	
options as part of the submission as	
follows:	
Option 1 – A scheme of 235 to 268 units	
and associated play space and	
landscaping buffers.	
Option 2 – A scheme of 490 to 560 units and associated play space and	
and associated play space and landscaping buffers	
• Option 3 – A scheme of 750 to 860 units,	
associated play space, landscaping	
buffers and local centre.	
The Council considers that the proposed	
Strategic Site 'Land to the west of	
Bridgend' is located in a sustainable	
location and is accessible to public	
transport, which allows for connectivity to	
the town centre where there are wider	
transport links. In terms of pedestrian	
facilities, there are a number of existing	
footpaths and cycle routes in close proximity to the site which allows for	
connectivity to Laleston and Bryntirion	
along the northern section of the A473.	
Along the southern site of the A473, there	
is a shared cycleway/footway which	
provides cyclists a continuous cycle lane	
allowing connectivity to Laleston to the	
west. The Council also note that the site	
has access to a food store at Laleston. It	
follows therefore that if this site is deemed	
to lie in a sustainable location, in terms of	
accessibility credentials, it is difficult to	
conceive a different view being reached in	
respect of the land to the west of Laleston	
given that it has access to the same pedestrian, cycles routes and public	
transport links. We do not intend to repeat	
	I

Local Settlement' where new le Candidate Site referenced e considered to represent an posed for allocation and the the considerable and detailed content of the Candidate Site Representations here, however the previously submitted information contained substantial information to support the allocation of the site as well as a detailed sustainability and connectivity appraisal. It is important to point out that the information submitted with the Candidate Site Representations demonstrate that the land to the west of Laleston is suitable and appropriate for housing development and should be viewed favourably for the following reasons:

• The site, and options proposed (which vary in size and scale), can be considered individually and/or as appropriate phases of an overall site. Each element, and the overall scheme, is inherently deliverable not least because the site involves just two land ownership interests - the site is within the ownership of Mr Jerome Mathias with the eastern most portion of the site under an option agreement to BDW who remain committed to delivering the site. This will enable a significant and meaningful supply of housing to be delivered.

• The site lies centrally between, and is accessible to, the principal and key settlements of Bridgend, Porthcawl and Pyle;

• The site currently benefits from being within close proximity to established footpath and cycleway links and is within safe and convenient walking distance of existing bus stops, which provide a high diversity and frequency of service provision to Laleston and Bridgend. Indeed the Council's Settlement Assessment points out that Laleston is only one of three settlements (together with Porthcawl and Merthyr Mawr) in Bridgend with median outbound bus services frequencies of 15 minutes or less;

• The smaller options presented for the site offer an opportunity of sustaining the



settlement of Laleston through utilising the existing sustainable transport links to Bridgend and Pyle and the provision of much needed housing, including the provision of affordable housing, which has positive knock on effects to local services through increased demand in a settlement that the market wishes to be part of;

• The site wide proposal enables and facilitates enhanced community infrastructure, including improved recreation and education infrastructure with there being an opportunity to provide land for a new primary school or an extension to the existing Primary School in Laleston. These facilities would be positioned centrally allowing easy access between, and to, both the existing and proposed future housing;

• A network of open spaces including footpaths, sports pitches and areas for informal recreation are proposed throughout the overall site. These will facilitate social interaction and integration between residents of the development, and the wider community;

• The site is not subject to any unresolvable technical, ecological, archaeological / heritage, flood risk and drainage, or other environmental constraints.

• In terms of the Placemaking Principles set out in PPW the site is located immediately adjacent to the settlement of Laleston, which has a number of services and facilities within close proximity of the site. These services and facilities would facilitate and encourage the growth of the settlement in both a natural and sustainable manner.

• In terms of pedestrian connectivity, there are ample footway connections into the village of Laleston where a number of services are located. In terms of accessibility by public transport, the site



lies adjacent to two bus stops, which provide services to Aberdare, Bridgend, Bridgend Train Station, Cardiff, Porthcawl, Pyle, Pyle Train Station, Neath as well as surrounding towns and villages. Having regard to the above, the land to the west of Laleston and its associated development options represent appropriately scaled allocation of development which makes effective use of an accessible and sustainably located site. This coupled with the lack of any technical constraint, and the contribution this deliverable site will make to the supply of homes in the early years of the plan provides considerable support and justification for the scheme proposals. To reduce the risk of the LDP not being delivered if some of the larger sites in the Sustainable Growth Areas do not come forward, land to the west of Laleston (Candidate Site Ref: 347.C1) should be allocated for housing in the Deposit Draft RLDP.	strategic sites and a proposal to allocate 347.C1 to	All strategic sites key to the delivery of the plan have been subject to greater evider their delivery, including schematic frameworks, phasing details, key transport requirements, design parameters, s106 requirements, infrastructure and costs. Th degree of confidence that the sites included within the Deposit Plan are realistically full plethora of associated development requirements, infrastructure provision a necessary to deliver high-quality new communities. Moreover, an appropriate flexibility allowance (10%) has been embedded into the De which is clearly set out in the Housing Trajectory Background Paper. The flexibility all that there may be certain specific circumstances, unknown at the plan making stag sites, notwithstanding the robust frontloading of site delivery evidence. This is a large specifically to enable the Replacement LDP's housing requirement to remain comfort that a strategic site fails to come forward as anticipated at this point of plan prepar allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable throug a significant unforeseen scenario, such as non-delivery of a strategic site, should oc The trajectory was prepared initially through close dialogue with the respective effective collaboration and involvement with a range of stakeholders at a Stake documented within the Housing Trajectory Background Paper, there were r disagreement on the completion figures or the timing and phasing of sites in the p sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposal to include Candidate Site 347.C1 is not supported and is also
strategic sites.		Hierarchy and Spatial Strategy. The total level of housing provision within the Depo

lence requirements to support ort corridors, critical access This process provides a high ly deliverable, considering the and placemaking principles

Deposit Plan and the basis for allowance recognises the fact age, that delay the delivery of ge flexibility allowance, chosen ortably deliverable in the event paration. With a 10% flexibility ughout the plan period even if occur.

e site-promoters, followed by akeholder Group Meeting. As a no outstanding matters of a plan period (including those ion of the Stakeholder Group

lso contrary to the Settlement posit Plan is set appropriately

			with a flexibility allowance to ensure delivery of the housing requirement, taking in non-delivery and unforeseen issues in accordance with the Development Plans Mar
170	SF1: Settlement Hierarchy - The option for growth is limited by only identifying 1 Primary and 4 Main settlements. Within two of the Main settlements, Pencoed and Maesteg physical constraints/limits are also identified further limiting options for growth.	Comment that the settlement hierarchy limits growth.	The Settlement Hierarchy has been defined based on a robust Settlement Assessm This accords with the Spatial Strategy (refer to Spatial Strategy Options Backgro deliverable sites have been identified to enable delivery of the housing requirement (r Options Background Paper). This concern is not supported.
	The 20% flexibility level is supported in view of the reliance on a number of larger regeneration sites many of which have been allocated in plans before and have not been delivered.	Support 20% flexibility allowance	Comment noted. An appropriate flexibility allowance (10%) has been embedded into basis for this allowance is clearly set out in the Housing Trajectory Background Pap recognises the fact that there may be certain specific circumstances, unknown at the delay the delivery of sites, notwithstanding the robust frontloading of site delivery flexibility allowance, chosen specifically to enable the Replacement LDP's hous comfortably deliverable in the event that a strategic site fails to come forward as ant preparation. With a 10% flexibility allowance, the Anticipated Annual Build Rate (AA throughout the plan period even if a significant unforeseen scenario, such as non- should occur.
	HBF raised concerns regarding the number of large sites which have been rolled over from the previous plans and the UDP before that, a number of which have benefitted from planning consents and Welsh Government grant funding but have still not delivered any homes to date. This is the case for a number of the site in Maesteg and the Porthcawl site which on its own represents 14% of the plans	De-allocate some brownfield regeneration sites	These comments are noted, although no action is considered necessary. Two exists regeneration sites were initially proposed for re-allocation (Parc Afon Ewenni and P the Replacement LDP, both of which are considered deliverable components of delivery of the housing requirement. Before being 'rolled forward' into the Deposit P to robust re-assessment of their sustainability, deliverability and viability credentials other candidate sites. In the case of Porthcawl Waterfront, there has been a substant to demonstrate the sites can be delivered over the Replacement LDP period, as in trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Optic Candidate Site Assessment).
	its own represents 14% of the plans housing allocation. A number of the sites in Maesteg are particularly challenging in terms of physical constraints but there is also a question over the market demand for the number of homes proposed in this area. Members evidence from the Joint Housing Land Availability Studies in the past would suggest that this type of valley location has a ceiling on the number of units which can be sold which is likely to		For Parc Afon Ewenni, the Council has now removed the site from the housing traje subsequent uncertainty relating to delivery timescales. The Candidate Site Assessme updated to reflect this constraint, of which states that 'the site is located within to Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The allocation from the existing LDP (REG1(6)) and is proposed to be developed for uses. However, the Council's Strategic Flood Consequences Assessment identifies vulnerable to flood risk. As such, the site will not therefore be allocated for develop LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewenni due to the timescales as a result of flood risk.
	units which can be sold which is likely to lead to only one or many two sites larger sites being able to come forward at any one time. A number of the larger sites proposed to be allocated are brownfield sites and although it is accepted that these are often the most sustainable location they do more often than not result in delays in delivery, in Bridgend's case many of these are not new sites and have been around for a number of years at a		For Porthcawl Waterfront, the Council has now purchased and has total control over a defence works are progressing on site and are due to be completed by the end of 20 currently being explored in order to bring forward development, initial work has procurement mechanisms and a formal procurement exercise is scheduled to co (Sandy Bay / Coney Beach) is being jointly promoted by the Council and a priva majority of the site is not reliant on coastal defence works to come forward. A land-ow a disposal strategy is being finalised and the site is likely to be brought to the marker Phase 2 now running in parallel, there is now no reason why both phases will be un forward together, as further evidenced by the extensive supporting deliverability evide change to Porthcawl Waterfront's trajectory is both unsubstantiated and not support

into account the potential for anual.

ment (2019, revised in 2021). round Paper) and numerous t (refer to the Strategic Growth

into the Deposit Plan and the aper. The flexibility allowance at the plan making stage, that ery evidence. This is a large using requirement to remain inticipated at this point of plan AABR) will remain deliverable on-delivery of a strategic site,

existing large scale brownfield Porthcawl Waterfront) within of housing supply to enable Plan, both sites were subject als in the same manner as all initial change in circumstances indicated within the housing obtions Background Paper and

rajectory due to flood risk and sment (2022) report has been in the settlement boundary of the site represents a 'Rollover' or commercial and residential es that the site is significantly elopment in the Replacement the uncertainty over delivery

er Phase 1 (Salt Lake), coastal 2022. Partnership options are as commenced in relation to commence shortly. Phase 2 ivate owner and a significant owners agreement is in place, ket shortly. With Phase 1 and unable to progress and come idence. As such, the proposed orted.

	time when the industry has been delivering at high levels, the Council must be cautious with their delivery trajectories on these sites and need to consider whether a better mix of sites should be allocated to ensure delivery rates.		The total housing provision, and spatial distribution thereof, has also been subject analysis to enable development of the housing trajectory. The trajectory was prep dialogue with the respective site-promoters, followed by effective collaboration and is stakeholders at a Stakeholder Group Meeting. As documented within the Housing Tra- there were no outstanding matters of disagreement on the completion figures or the in the plan period (including those sites with planning permission and new hou conclusion of the Stakeholder Group Meeting. In summary therefore, the represe Porthcawl Waterfront are not supported.
			In addition to the two aforementioned 'rollover' sites incorporated within the New Hous of supply, there are also three brownfield regeneration allocations within the existing L to re-allocate as Long-Term Regeneration Sites. These include Maesteg Washery, ( (Caerau) and the Former Cooper Standard Site, Ewenny Road (Maesteg). The retent a necessary degree of continuity with the first adopted LDP, which is essential to regeneration strategy embodied within the Replacement LDP Vision. However, for the in accordance with national policy, these Long-Term Regeneration Sites are not in housing supply. The housing land supply will therefore not be dependent on their def fact that they require longer lead-in times, preparatory remediation-based enabling strategic master plans before they can come forward. Whilst Long-Term Regeneration in the plan to enable their delivery, they will not relied upon as contributing to the ho also not be included in the windfall allowance. They are essentially 'bonus sites', no these significant brownfield sites are highly conducive to sustainable development a of placemaking principles outlined in Planning Policy Wales. This is clearly refer Trajectory Background Paper. Therefore, whilst the representor's concerns regarding are considered inconsequential to delivery of the Replacement LDP's housing requi in further detail within the Spatial Options Background Paper, the Minimising the Versatile (BMV) Agricultural Land Background Paper and the Candidate Site Assess
306	Our clients do not object to Policy COM1 (Housing Allocations), in principle, and support the Local Planning Authority's approach which consists of focusing on the delivery of strategic sites and large housing allocations. However, the applicant wishes to object to the lack of small-medium housing allocations in the plan in light of a) the wider residential aspirations of BCBC, b) the pressing requirement to deliver much-needed housing (both market and affordable) and c) the need to alleviate the 'continuing difficulties younger households face in accessing home ownership', as outlined LHMA (2021) which have been exacerbated by recent events, including Brexit and the pandemic. As you will recall, our clients have submitted representations for two sites: Land adjoining Heol-Yr-Orsaf Kenfig Hill (Candidate Site Ref. 306.C1) and Land adjoining New Road, Kenfig Hill	Allocate additional small-medium allocations, notably Land adjoining Heol-Yr- Orsaf Kenfig Hill (Candidate Site Ref. 306.C1) and Land adjoining New Road, Kenfig Hill (Candidate Site Ref. 306.C2).	The Strategy seeks to deliver several large-scale Sustainable Urban Extensions, w sustainable communities that will incorporate a mix of complementary uses and deliv- infrastructure and/or provide new supporting infrastructure. Indeed, this latter factor the school capacity issues across the County Borough and the need for new strat- enough in scale to support provision of a new primary school as a minimum. Sustain have been proposed for allocation where they can best support the Replacement and are capable of delivering mixed use development at a scale that will enhance co- ldentification of appropriate Sustainable Urban Extensions has been undertaken in Search Sequence and other requirements set out in Planning Policy Wales, as evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy Housing Trajectory Background Paper and Minimising the Loss of BMV Agricultura The rationale for the proposed allocations within the Deposit Plan is clearly outil Assessment. Without exception, all proposed sites are supported by a large bod evidence to demonstrate their deliverability. The proposal to place a greater reliance on small to medium sized greenfield sites sites of this scale are far more likely to have an adverse impact on local commun- infratructure problems and it is more difficult for such sites to provide their own su they reach sufficient critical mass. As noted in the Plan-Wide Viability Appraisal, site can pose their own viability issues for this very reason. Therefore, the Deposit Pla- allocations where capacity was clearly demonstrated to accommodate the respective

bject to site-specific phasing epared initially through close d involvement with a range of Trajectory Background Paper, ne timing and phasing of sites iousing allocations) following esentor's concerns regarding

using Allocations Component LDP that the Council intends Coegnant Reclamation Site ntion of such sites represents to implement the long-term the avoidance of doubt, and included as a component of delivery, in recognition of the g works and/or more detailed tion sites will still be allocated housing requirement and will notwithstanding the fact that t and delivery of the full range ferenced within the Housing ng these sites are noted, they quirement. This is considered e Loss of the Best and Most ssment.

which is necessary to create liver improvements to existing or is particularly notable given trategic sites to be significant ainable Urban Extension sites of LDP Vision and Objectives communities.

n in accordance with the Site as documented in supporting by Options Background Paper, ural Land Background Paper. utlined in the Candidate Site ody of technical and viability

tes is not supported. Several nunities by exacerbating local supporting infrastructure until sites of several hundred units Plan has only proposed site ctive level of growth within the

	(Candidate Site Ref. 306.C2). Following the submission of extensive information demonstrating that the sites are viable and readily available for development, the receipt of market interest from local developers, and the requirement for local authorities to allocate a 'range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium Enterprises (SMEs) and the custom and self-build sector the opportunity to contribute to delivering the proposed housing requirement', (as outlined in Planning Policy Wales (PPW) 11), the clients wish to, once again, raise these development opportunities to the Local Authority's attention and seek their allocations in the emerging plan. This is to encourage the inclusion of small-medium sites in BCBC's housing strategy. The reasons for the objections to the lack of inclusion of small-medium sites, and the continued promotion of the two sites at Kenfig Hill are provided in greater detail in the next section.		settlement and/or necessary facilities and infrastructure improvements could be provided in support of the development. The Candidate Site Assessment clearly explains why Land adjoining Heol-Yr-Orsaf Kenfig Hill (Candidate Site Ref. 306.C1) and Land adjoining New Road, Kenfig Hill (Candidate Site Ref. 306.C2) have not been proposed for allocation. Firstly, the site promoter for 306.C1 has failed to demonstrate that the site is viable through the submission of a viability assessment. Secondly, the majority of 306.C2 is located outside the settlement boundary of Kenfig Hill which is identified as a Sustainable Growth Area (as defined by SP1). Notwithstanding this, a significant part of the site is heavily wooded and is designated as a SINC. No supporting information has been provided to overcome this potential constraint. Furthermore, the required level of growth can be accommodated on less sensitive alternative sites and serve this area. Overall, and despite the representor's claim that "the sites are viable and readily available for development", no detailed viability appraisals have been submitted to the Council to demonstrate that this statement is accurate. The proposal to allocate both sites is therefore not supported.
222	Bellway supports the spatial strategy set out in Policy SP1 in terms of delivering a Regeneration and Sustainable Urban Growth Led Strategy (Option 4) as recommended in the Spatial Strategy Options Background Paper and findings of relevant up-to-date evidence. Bellway are in agreement that growth should be channelled towards settlements in recognition of their position in the settlement hierarchy as recognised within the Background Paper to the Spatial Strategy. Furthermore, Bellway support the findings of the Sustainability Appraisal Summary for Option 4 in terms of major settlements which include North Cornelly being most able to accommodate strategy scale housing growth and thus capable of implementing the preferred growth level. Bellway note from a review of evidence base documents which support that the spatial distribution of housing that:	Support spatial strategy	Comments noted (Refer to Growth Options Background Paper and Spatial Strategy Options Background Paper).

<ul> <li>1. The Settlement Assessment considers the grouped settlements of Pyle/ Kenfig Hill/ North Cornelly to be a main settlement (Tier 2);</li> <li>2. The LHMA recognises growth at main settlements, including North Cornelly and a significant shortfall of affordable housing;</li> <li>3. The Plan Wide Viability Assessment provides an analysis of the plan wider viability which aside from Llynfi, Ogmore and Garw Valleys all sites are considered viable based against varying levels of affordable housing provision, and</li> <li>4. The Background Paper to Minimising the Loss of BMV Agricultural Land confirms that there are low quantities of BMV across Stage 2 Candidate Sites within Pyle, Kenfig Hill and North Cornelly which is a key factor in developing the spatial strategy.</li> <li>In regard to the above, and specifically with the land at Heol Fach in mind, Bellway have submitted viability evidence to demonstrate that the deliverability of housing on land at Heol Fach to be viable and should be allocated within the final version of the RLDP. Whilst it is appreciated that the viability evidence publically available relates to the plan wide viability Bellway draw the Council's attention to the viability credentials of the land Heol Fach wilch on be dismissed. In addition, as part of the technical information submitted to the Consultation, the development of housing on land at Heol Fach will not result in the loss of BMV as almost all of the site is identified on Version 2 of the Predictive Agricultural Land Classification (ALC) Map as subgrade 3b, with the potential for some grade 2 although considered limited.</li> </ul>	Propose allocation of Land at Heol Fach,	The representor has submitted a comprehensive viability assessment for Land at Therefore, demonstrating that the site is viable and deliverable. As stated in the Candidate Site Assessment (2022), "The candidate site is located Cornelly which is identified as a Sustainable Growth Area (as defined by SP1). The Active Travel network which will help foster and promote transit-oriented developme be free of any significant constraints. However, whilst the Candidate Site Assessme site is considered to accord with the LDP strategy and has passed all tests of assess have decided that this site is not required for allocation as they deem a 10% flexibilit
as subgrade 3b, with the potential for		

## at Heol Fach, North Cornelly.

ted on the periphery on North The site is well serviced by the ment. The site is considered to ment concludes by stating that sessment, members of Cabinet bility allowance is sufficient.

	(SDP) issue and is considered premature to be allocated through the RLDP. Further comment on this point is provided under the appropriate heading.		
394	support	None	Comments noted.
1390	Lodgeground Ltd (Dovey Estates) support the spatial strategy.	None	Comments noted.
1404	the spatial strategy. We support Pencoed's identification as a Main Settlement of the County Borough where major employment, commercial and residential development is to be focussed. The Settlement Assessment Study (revised 2021) which comprises an evidence base paper to the Deposit Plan rightly scores Bridgend well above any other settlement in the Borough – as shown in the extract. However, despite Pencoed achieving a score of 53 (compared with 52 at Pyle for example), the proportion of growth through allocations is not equivalent to the level of services and facilities available. It is considered that the level of growth should be significantly increased given its sustainability credentials. The importance of this at the plan-making stage has increased since the adoption of the current LDP through changes in national policy (for example, in Planning Policy Wales and Building Better Places). An increase in the level of housing in Pencoed would also better link with the distribution of employment land in the County Borough. The level of growth in Pencoed in the LDP's Spatial Strategy should therefore be increased. Paragraph 3.49 of Planning Policy Wales states that "Spatial strategies should support the objectives of minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport". It is therefore important that any new allocations are located in closest	Increase the distribution of housing towards Pencoed	The Replacement LDP apportions sustainable growth towards settlements that alre services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment (2019, revised in 2021) has bee sustainable settlement hierarchy. Based upon the consideration of a compref sustainable growth is proposed to be appropriately directed towards the Settleme Pencoed and with the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly'. Informed by the Sustainability Appraisal Report, the Candidate Site Assessment p Deposit Plan confirms and provides reasoned justification for the outcome of the site of each candidate site. The total housing provision, and spatial distribution thereof, has also been subj analysis to enable development of the housing trajectory. The trajectory was pref dialogue with the respective site-promoters, followed by effective collaboration and stakeholders at a Stakeholder Group Meeting. As documented within the Housing Tr there were no outstanding matters of disagreement on the completion figures or the in the plan period (including those sites with planning permission and new ho conclusion of the Stakeholder Group Meeting. Moreover, the level of residential development that can be accommodated within existing development moratorium. As detailed within the Development West of i Background Paper, any new development which generates a net increase in vehicula congestion either side of the level-crossing and at the complex over-bridge junction the relief road and Penybont Road. It is recognised that development capacity to would not be of sufficient scale to generate the required level of developer-funde resolve the problem within the Plan period. Significant assessment has been un solution which is likely to require major interventions to include the closure of the He well as a replacement Penprysg Road bridge with significantly improved capacity and However, the available solutions are subject to many constraints which would no further assessment and des
	proximity to the town centre where active travel and public transport can be more readily accessed by residents.		Options Background Paper). The justification for the proposed site allocations is clear Site Assessment. Therefore, the representor's proposal is not supported.
219	This policy builds on Policy SP1 (Regeneration and Sustainable Growth	No proposed changes.	Comments of support acknowledged.

Iready benefit from significant o enabling transit orientated een undertaken to establish a ehensive range of variables nents of Bridgend, Porthcawl,

published to accompany the selection process in respect

bject to site-specific phasing repared initially through close ad involvement with a range of Trajectory Background Paper, he timing and phasing of sites nousing allocations) following

hin Pencoed is limited by the f the Railway Line, Pencoed ular movement will exacerbate on between the eastern end of to the west of the railway line ded infrastructure required to undertaken into developing a lendre Road level crossing as and active travel infrastructure. heed to be overcome through y undertakers. There are also s for major intervention can be Pencoed should be retained ntervention materialises.

housing accords with both the ackground Paper). Numerous t (refer to the Strategic Growth learly set out in the Candidate

			-
	Strategy) by identifying Strategic Allocations for the four Regeneration Growth Areas and three Sustainable Growth Areas. Bridgend College support the identification of "Land East of Pencoed" as a Strategic Allocation within the Pencoed Sustainable Growth Area. Bridgend College have specific policies on the wording supporting the strategic policy itself and these are provided elsewhere within this response. Support: Policy SP2 is supported.	East of Pencoed as a means of delivering the	
407		No proposed changes. Supports allocation of Land South of Bridgend as a means of delivering the growth strategy.	Comments of support acknowledged.
425	<ul> <li>We support Bridgend's identification as the Primary Key Settlement of the County Borough where major employment, commercial and residential development is to be focussed. The Settlement Assessment Study (revised 2021) which comprises an evidence base paper to the Deposit Plan rightly scores Bridgend well above any other settlement in the Borough – as shown in the extract below: However, despite the town achieving a score of 79 (compared with 55 at Porthcawl for example), the proportion of growth through allocations (at circa 41% of all allocations) is less than the current adopted LDP (at circa 53% of all allocations). It is considered that the level of growth should be significantly increased given its sustainability credentials. The importance of this at the plan-making stage has increased since the adoption of</li> </ul>		The Replacement LDP apportions sustainable growth towards settlements that alr services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken to establ hierarchy. Based upon the consideration of a comprehensive range of variables sus to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Per Settlement of 'Pyle, Kenfig Hill and North Cornelly'. Whilst Pyle, Kenfig and North Cornelly was not identified as a growth area in the spatial strategy is being proposed for the Replacement LDP. The basis for this si Spatial Strategy Background Paper and it is considered the best option to align with Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDD Strategy is considered most conducive to accommodating the level of growth ident Options Background Paper and also delivering this growth through sustainable p accord with the Planning Policy Wales' placemaking principles. It will maximise at high-need areas, promote viable sustainable development, enable delivery of sign sites in accordance with the site search sequence and seek to minimise pressur subject to site-specific assessment. Each candidate site has been assessed against the criteria in the Candidate Site which was previously consulted upon (See Appendix 13 – Candidate Sites Assess Stage 2 detailed assessment, sites were examined based on any specific issues

already benefit from significant to enabling transit orientated ablish a sustainable settlement sustainable growth is proposed Pencoed and with the grouped

he existing LDP, an alternative s strategy is detailed within the with the Vision and also the Key LDP is seeking to address. The entified in the Strategic Growth e patterns of development that affordable housing delivery in significant remaining brownfield sure on BMV agricultural land,

Site Assessment Methodology ssment Report (2020)). During es they raised in terms of their

	the current LDP through changes in national policy (for example, in Planning Policy Wales and Building Better Places). Bridgend is the most sustainable location for new growth in the County Borough and Welsh Government's National Development Framework Future Wales 2040 (which has Development Plan status) identifies Bridgend as being located within the National Growth Area in South-East Wales. <u>An increase in the level of housing in Bridgend would also better link with the distribution of employment land in Bridgend (being at 70%).</u> The level of growth in Bridgend in the LDP's Spatial Strategy should therefore be increased. Paragraph 3.49 of Planning Policy Wales states that "Spatial strategies should support the objectives of minimising the need to travel, reducing reliance on the private car and increasing walking, cycling and use of public transport". It is therefore important that any new allocations are located in closest proximity to the town centre where active travel and public transport can be more readily accessed by residents.		<ul> <li>deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepar technical supporting studies to demonstrate the site's deliverability, sustainability and detailed assessment, only those sites deemed appropriate were included for allocati The level of growth apportioned to Pyle, Kenfig Hill and North Cornelly and Port consistent with the Settlement Hierarchy, Spatial Strategy and LHMA.</li> <li>The total housing provision, and spatial distribution thereof, has also been subje analysis to enable development of the housing trajectory. The trajectory was prep dialogue with the respective site-promoters, followed by effective collaboration and is stakeholders at a Stakeholder Group Meeting. As documented within the Housing Tra there were no outstanding matters of disagreement on the completion figures or the in the plan period (including those sites with planning permission and new hou conclusion of the Stakeholder Group Meeting.</li> <li>For these reasons, the proposal to re-proportion strategic growth away from the g Kenfig Hill and North Cornelly' and towards Bridgend is not supported.</li> </ul>
391	Summary of the Background to Land at City Farm A large portion of the Site is currently allocated under the Bridgend Local Plan 2006-2021 (Adopted 2011). Policy PLA1: Settlement Hierarchy and Urban Management stated that <i>"Development will be permitted within settlement boundaries at a scale commensurate with the role and function of settlements"</i> . Bettws was designated as a Local Service Settlement within this policy. Policy COM 2(2) City Farm allocated the Site for housing (40 residential units), however, despite historic planning permissions having been granted on the site, it has not been brought forward for development by the previous owners. There are two expired permissions on the site, the most relevant was for the construction of 40 dwellings and associated works under application	Concerns regarding mix of sites and windfall allowance.	Comments noted. Identification of appropriate proposed allocations has been undertaken in accord Sequence and other requirements set out in Planning Policy Wales, as documente the Plan. This includes the Candidate Site Assessment, Spatial Strategy Options B Trajectory Background Paper and Minimising the Loss of BMV Agricultural Lan rationale for the proposed allocations within the Deposit Plan is clearly outlin Assessment. The windfall allowance is not considered higher than average. Edition 3 of the D stresses the importance of small and large site windfall rates as separate component states "reviewing windfall delivery rates for both small and large sites, over different consideration of a future extrapolation rate". The Manual also cautions against using purpose and suggests "the time period chosen should be sufficient to rule out anor be of a reasonable duration". Indeed, it is important for the future extrapolation rate rate of completions to avoid being skewed by particularly high or low trends. Therefor over the whole existing LDP period (2006/07 to 2020/21) is considered the most rot period encompasses the recession, the subsequent repercussions and the following y This is especially given the fact that the Replacement LDP seeks to broadly contin Regeneration-Led Strategy (along with some additional sustainable growth) and also boundaries. An Urban Capacity Study (UCS, 2020) was published alongside the Dep analysis of the potential urban capacity of the County Boroughs' settlements for

essibility, physical character, pare and submit a number of and suitability. Proceeding this cation in the Deposit Plan.

orthcawl etc. is unequivocally

bject to site-specific phasing repared initially through close ad involvement with a range of Trajectory Background Paper, he timing and phasing of sites nousing allocations) following

grouped settlement of 'Pyle,

ordance with the Site Search ited in supporting evidence to Background Paper, Housing and Background Paper. The tlined in the Candidate Site

e Development Plans Manual onents of housing supply and nt time periods, will shape the using abnormal trends for this nomalies in specific years and te to be based on a balanced efore, the fifteen-year average robust for this purpose as this of years of economic recovery. ntinue with the existing LDP's lso maintain similar settlement Deposit Plan to provide further for housing to evidence the

reference P/06/1465/FUL and an	expected small and windfall site allowance rate. This UCS identifies more than su
application in 2015 for the development of	proposed settlement boundaries to accommodate this particular component of h
8 dwellings on part of the site under	demonstrates (in addition to past trends) that the small and windfall site allow
reference P/15/236/FUL. This	Replacement LDP is both realistic and deliverable. It also serves as a useful resource
demonstrates that during the adopted plan	who are seeking to identify potential development opportunities not specifically allo
period the site was deemed appropriate for	LDP. The representor's concerns are therefore unsubstantiated and not supported
development and approval was granted	trajectory will be reviewed as the plan progresses and as part of the monitoring fram
for the aforementioned development.	LDP. Refer to the Housing Trajectory Background Paper and UCS.
Policy COM2 Residential Allocations	
outside the Strategic Regeneration	
Growth Areas identified site COM2(1)	
Land to the South West of City Road) for	
up to 80 homes. This allocation	
neighbours our clients site and has not	
been brought forward for development	
within the plan period. In addition to this,	
that site was allocated under Policy	
COM13(10) as an area to provide	
accessible natural greenspace as part of	
its development prospects.	
Clearly, therefore the regeneration	
benefits proposed as part of the current	
adopted LDP have not been realised and	
Bettws has very much been left behind in	
terms of provision of new homes and open	
green spaces.	
g. con opaccoi	
The Preferred Strategy Approach to	
Bettws	
The Preferred Strategy consultation	
document identified an approach which	
consisted of allocating a series of larger,	
medium and small sites to deliver the	
identified housing need. It was proposed	
that these would have been supported by	
a higher than average allowance for	
windfall sites.	
The DO identifies Decomposition Ormith	
The PS identifies Regeneration Growth	
Areas (RGAs) and Sustainable Growth	
Areas (SGAs) which will be the main focus	
of planned development and identifies	
sites of around 1000 homes could deliver	
the infrastructure needed to accommodate	
the resultant population increase. It then	
proposed that sites of 150 dwellings or	
less would also contribute towards	
housing delivery, but that were small	
enough so as not to result in a significant	
impact on local infrastructure, except for	

a sufficient capacity within the f housing supply. It therefore allowance rate utilised in the purce to developers and SMEs allocated in the Replacement orted. Moreover, the housing ramework of the Replacement

some localised improvements. Finally, small extensions to settlement boundaries would provide opportunities for smaller sites to come forward. Bettws was not identified in either of the two growth areas. The land is also included within the 'Regeneration Sites' list within the Housing Background Paper as a site which does not meet the criteria to be considered as a formal commitment, but as one which could come forward if a policy is proposed as part of the Deposit plan to cover these sites. Notwithstanding this, Llanmoor Homes questioned the validity of the overall approach for Bettws given the recent investment in the school provision within Bettws and the other services and facilities available within the settlement (including its location on an active travel route). We considered this to be a significant lost opportunity where the community will miss out on much needed regeneration, yet again. <b>Deposit BRLDP Approach to Bettws</b> <b>Summary of the Approach</b> Bettws is identified within the Deposit BRLDP under Policy SF1 – Settlement Hierarchy and Urban Management as a 'Local Settlement'. The document proceeds to advise that "Local Settlements perform a more limited retail and community facility function, primarily serving their local residents. Whilst all services and facilities are important to their respective hinterlands, those on offer in these settlements draw from a smaller catchment area and are primarily confined to serving the more immediate population base. As such, the scope for Local Settlements to accommodate significant development is more limited, yet there are still opportunities to support smaller scale regeneration led growth to facilitate local economic development.". The BRLDP identifies that Local Settlements would contribute around 4% of the overall housing requirement (circa.347 homes), however, no new	Proposal to re- define Bettws as a Regeneration Area due to similarities with the Ogmore and Garw Valleys	Regeneration Areas aim to enable development of a scale and nature that is tailored diversifying and strengthening local economies, connecting communities to wider or their high quality environments. Regeneration Areas therefore aim to capitalise on promote active lifestyles, grow the tourism industry and facilitate smaller-scale brownfield sites. This latter element recognises that distinctive approaches are development in these areas, which could include initiatives such as co-operative h custom build opportunities alongside other forms of development. Bettws is defined as a lower scoring Local Settlement by the Settlement Assessme demonstrate as significant a degree of self-containment as the Ogmore and Garw services and facilities score and the sustainable transport and accessibility sr Assessment. As such, a similar designation is not considered warranted. The strateg in its current form to enable small scale development within the existing settlement to

red to community needs, whilst er opportunities and protecting on their rural surroundings to ale development on primarily are required to bring forward e housing, self-build plots and

sment and is not considered to arw Valleys, as evident by the score within the Settlement ategy is considered appropriate ent boundary of Bettws. allocations or changes to the settlement boundaries are proposed and any proposals that come forward would be windfall and dealt with on their own merits in accordance with the relevant policies within the Plan.

## Comments on the Approach – Similarities with Other Settlements

The Ogmore and Garw Valleys are identified within the BRLDP as Local Settlements under Policy SF1. Accordingly they are identified as having similar credentials to that of Bettws. Both Valleys are located to the east of Bettws and are accessed from the M4 in the same way. Many of the issues and difficulties faced by these two Valley communities are also highly relevant to Bettws.

In reference to the Ogmore and Garw Valleys, paragraph 2.2.12 of the document states "Much of the housing stock in the upper valley settlements consists of traditional mining terraces, some of which have fallen into disrepair. Housing choice is therefore a significant issue for these areas and regeneration led development would be of great benefit".

Whilst Bettws does not have the same level of traditional mining terraced housing, the area does have significant areas of former council housing stock which are in a poor state of repair, along with areas where such housing has been demolished and remain undeveloped.

In discussing the potential for the two Valley communities, para.4.3.20 of the deposit BRLDP states "alternative forms of development would help deliver smallerscale growth, such as (but not limited to) co-operative housing, self-build and custom build opportunities alongside other forms of development. Such community investment opportunities will enable development of a scale and nature that is tailored to community needs, whilst diversifying and strengthening the local economies, connecting communities to wider opportunities and protecting the high quality environments.".



Such an approach is then implemented through Policy SP1 Regeneration and Sustainable Growth Strategy, where both valleys are identified as Regeneration Areas. The designation identifies that such settlements would benefit from community based regeneration and recognise that a range of localised approaches are required to incite community investment opportunities. Despite the investment in schools, community facilities, and private speculative developments (e.g. Village Lodge Bunkhouse) in Bettws, the settlement has not been earmarked for any specific regeneration benefits. Given the similarities in the nature and contexts with the adjoining Valley communities, greater emphasis should be placed on regeneration within the settlement. Accordingly, on this basis we would object to Policy SP1 Regeneration and Sustainable Growth Strategy in that Bettws should be included within the policy as a Regeneration Area.	Reflect Proposed Active Travel	The Settlement Assessment's tri-principle scoring matrix considers whether activ within settlements in arriving at an overall score. The proposed active travel rou
Whilst we do not object to Bettws' designation as a Local Settlement, there are some clear inconsistencies in the approach taken to identify it as such. The 2019 Settlement Assessment (as updated (2021)) inaccurately identifies Bettws as not having access to an active travel route. The Council's Integrated Active Travel Network Map (2018) 1 identifies Bettws as having access to an Active Travel route as shown on the below extract: Furthermore, paragraph 5.2.80 of the Deposit BRLDP lists Bettws as a settlement benefitting from an active travel route. As a result Bettws misses out on a number of points within the Settlement Assessment which would, and should therefore increase its standing within Table 10: Overall Tri-Principle Settlement Assessment of the Settlement Assessment of the Settlement Assessment Report. Such an increase	Route for Bettws within Settlement Assessment	constructed and therefore the Settlement Assessment is considered accurate in its

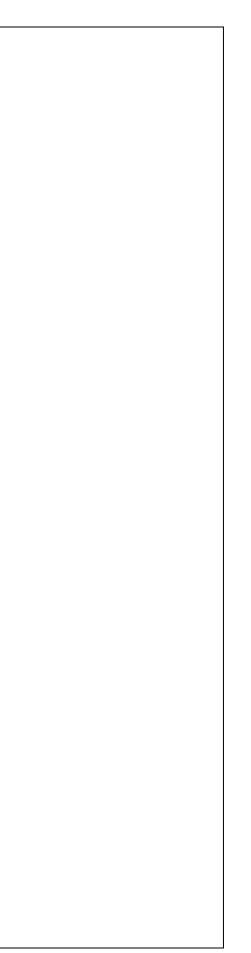
ctive travel routes are present route in Bettws has not been its current form.

would allow for greater justification for the settlement to be identified as a		
Regeneration Area.		
Regeneration Area. <b>The Potential for Bettws</b> As highlighted previously in this submission, Bettws has been a longstanding target for regeneration within the current adopted LDP. Despite planning permission having been granted for part of the site being promoted by Llanmoor Homes, the previous owner whose business was based in England, has never brought this forward. Having now undertaken significant assessment and survey work on the allocated site, it is our view that the site was simply unable to accommodate the 40 dwellings it had previously been allocated for. Furthermore the land to the north, known as Land south west of City Road, is partly owned by BCBC and part by Valleys to Coast. This site is currently allocated for regeneration and open green space. Again, no proposals have come forward for this site to-date. Bettws itself has, however, seen significant investment in the form of two new schools during the current plan period, along with small number of housing and private commercial developments, all of which have been a benefit to the settlement, despite this there is still significantly more potential. Llanmoor Homes purchased the land at City Farm from the previous owners in 2019. A key reason for the purchase of the site by Llanmoor was that they saw the potential it offered in terms of the demand and desire for new housing from the local market, and also the relationship and potential connections with the regeneration land to the north. Llanmoor Homes do not see the investment in this particular site as an isolated one, they see the potential to work with BCBC and Valleys to Coast to deliver a scheme which would benefit the settlement as a whole and capitalise on its synergy with the	Extend the settlement boundary for Bettws to accommodate Land at City Farm to enable regeneration	All allocations have been proposed based on the outcome of the Candidate Site Ass with the National Sustainable Placemaking Outcomes, the Gateway Test applied to and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. A are considered to demonstrate delivery in accordance with the requirements set ou Manual. A Settlement Boundary Review (2021) was also published alongside the Deposit PI This study provides the background and justification for the review of the settlement through the Replacement Local Development Plan (2018-2033). It includes a list considered when determining if and how an existing settlement boundary should b maps and tables for the County Borough of Bridgend illustrating the proposed c reasons for them. This Study did not propose any changes to the existing settlement extending the settlement boundary to enable development of greenfield land within a is not supported.

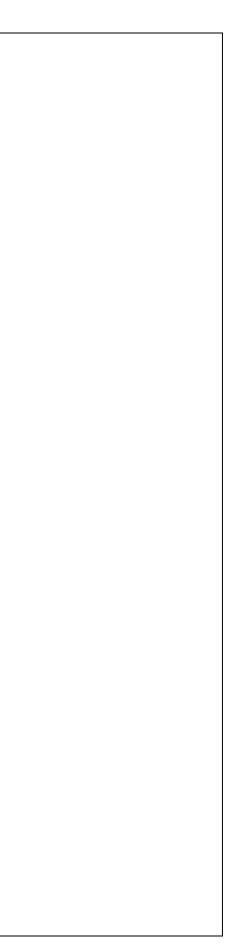
Assessment, their compatibility d to the site search sequence All new proposed allocations out in the Development Plans

Plan consultation documents. ment development boundaries list of matters that have been d be changed. It also includes d changes and explaining the ment boundary of Bettws, and in an isolated Local Settlement

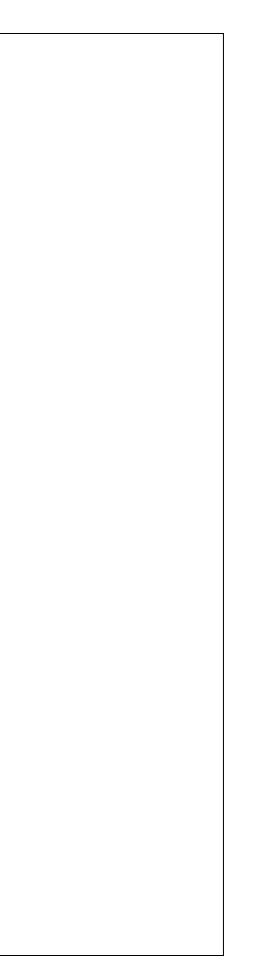
The plan below, extracted from the	
adopted LDP map, indicates the two	
current allocations along with the	
additional land the subject of this	
representation added in red. This	
demonstrates the potential for a	
successful and sensible rounding off to the	
settlement:	
As part of the Candidate Site Stage 2	
submission a significant amount of detail	
was submitted to the Authority	
demonstrating the acceptability/suitability	
of the site for housing. Subsequent to this,	
pre-application discussions have been	
undertaken with the LPA in respect of a	
proposed development on the land.	
Following the feedback received, further	
design development is being undertaken	
and assessment of potential options to	
address concerns raised by Officers.	
Provided below is an extract from the	
current iteration of the proposed site plan.	
In addition, an updated drawing booklet is	
submitted alongside this letter, providing	
further detail in respect of the parameters	
for the proposed custom build plots.	
Mainly as a result of the topography of the	
site, its relationship with Bettws Road in	
level terms, and the need to provide SUDS	
on the site, the overall number of homes	
capable of being delivered over the wider	
site is circa.40 units.	
The western side of the site now includes	
plots designated for self-build / custom-	
build developments. The team have been	
in discussion with the Welsh Government	
and the Development Bank for Wales to	
discuss the progress being made in	
respect of their flagship Self Build Wales	
scheme. The scheme is at a relatively	
early stage of its inception and to-date, the	
scheme has been wholly based around	
publicly owned land being provided to	
accommodate such developments. There	
is, however, acknowledgment that to	
broaden the appeal and range of sites	
available as part of the scheme, some	
private sites will need to come forward.	



These proposals are progressing well and,	
it is Llanmoor's intention to include such	
plots within the final development	
proposal; again reflecting their	
commitment to providing a mix of	
opportunities for the community which	
would assist in the economic regeneration	
of the settlement.	
The proposed layout has also taken into	
account the need for placemaking and	
permeability and has made clear provision	
for a connection northwards into the BCBC	
and Valleys to Coast land. The vehicular	
and pedestrian connections to the north	
will enable an unfettered connection which	
further demonstrates the importance of a	
joined up approach to the regeneration of	
the settlement.	
The work undertaken as part of the	
Candidate Site Stage 2 site submissions	
confirms that the site is viable; it has	
limited ecological interest; there are no	
concerns in terms of utilities connection;	
the proposals can be successfully	
incorporated into the landscape; and there	
• • • • •	
are no issues from a noise nor air quality perspective.	
Furthermore, Llanmoor have been in	
regular dialogue with Valleys to Coast on	
the potential to bring forward the wider	
regeneration of the area. Valleys to Coast	
have recently gone out to tender and	
appointed Pentan Architects to develop a	
scheme for their land. In addition, initial	
high level discussions with the LPA on a	
proposed scheme have taken place. As	
part of these discussions, it is understood	
that Valleys to Coast presented data to Officers which identified clear need for	
housing for local people in the area. The	
data from BCBC's Common Housing	
Register for Bettws identifies that there are	
around 209 households waiting for	
accommodation. 145 of these are for	
single bed accommodation with the rest	
being for 2-bed and above. This	
demonstrates a clear demand and need	
for housing of all kinds within the	
settlement and everything possible should	



be done to ensure these households are		
able to stay in the area.		
Accordingly it is evident that there are		
clear signs of momentum building which		
would see these sites being developed		
after so many years of lying empty,		
contributing nothing to the settlement both		
economically and visually; causing		
unwanted anti-social behaviour to the		
detriment of the amenity of surrounding		
residents.		
Recommendation		
In light of the foregoing, clear momentum		
is starting to build around the regeneration		
of Bettws, this must be supported in the		
BRLDP along with the Ogmore and Garw		
Valleys, with its own specific designation		
as a Regeneration Area.		
To achieve this, a minor adjustment to the		
settlement boundary under Policy SF1 at		
the south western side of the settlement to		
include Llanmoor's additional land would		
be required. This would need to be		
supported by the designation of the		
settlement as a Regeneration Area under		
Policy SP1. Without the allocation of the		
additional land (allowing for a connection		
between the Llanmoor site and the jointly		
owned BCBC and Valleys to Coast land),		
Bettws would again miss out on much		
needed regeneration and housing to meet		
identified local need.		
Accordingly, we object to both the		
following policies:		
• • SF1: Settlement Hierarchy and		
Urban Management; and		
• • SP1: Regeneration and		
Sustainable Growth Strategy.		
Such an approach would be wholly in line		
with national policies relating to		
placemaking and regeneration of smaller		
Welsh communities to ensure their future		
prosperity and ensure that, in Bettws' case		
in particular, that the younger generation		
have somewhere to live, remain close to		
where they were born and brought up and		
feel proud of, with an opportunity to stay		
and grow in the locality. It would also be in		
line with the BRLDP's Objective (SOBJ1)		
	1	



to create high quality and sustainable		
places.		
Conclusion		
Bettws has benefitted over recent years		
with investment in both its schools, a small		
number of private housing, and some		
commercial development. This has		
provided Bettws with some regeneration		
benefit, but given the potential and need in		
the area for both housing and re-		
development of derelict brownfield land,		
there is clear scope for Bettws to capitalise		
on this with further regeneration.		
The Bridgend Replacement Local		
Development Plan should therefore give		
policy support for the settlement to back up		
its regeneration potential; in the same way		
it proposes for both the Ogwr and Garw		
Valleys. Bettws ought to be included as a		
Regeneration Area under Policy SP1 and		
additional land at the south western corner		
should be included within the settlement		
boundary to allow for a cohesive, joined up		
regeneration scheme which would meet		
the policy goals of Future Wales and		
BRLDP Objectives.		

Title	Title: Do you have any comments to make on design and sustainable placemaking policies?				
ID	Comment	Summary of changes being sought/proposed	Council response		
82	The Deposit Draft RLDP identifies three strategic policies (SP3, SP4 and SP5) which together relate to design, placemaking, climate change, transport and accessibility. These are not considered to be contentious and effectively repeat guidance contained within PPW. BDW therefore suggest that national policy provides sufficient guidance and control on design, placemaking, and sustainable transport grounds and accordingly these policies could be considered to be superfluous.	Remove local policies on design, placemaking, climate change, transport and accessibility and defer to national policies.	Whilst the comments are noted, these policies are considered fundamental achieve t Objectives of the Replacement LDP and to deliver sustainable development in a mar sustainable places and maximise the well-being of Bridgend County Borough's residents As such, the representor's comment that "these policies could be considered to be superflu		
	BDW also have concerns that it may not be possible for all developments to comply with		Comments noted, although the policy is considered appropriate in the current form.		

chieve the Vision, Aims and n a manner that will achieve esidents and its communities. superfluous" is not supported.

	all 14 of the criteria listed in Policy SP3 (good design and placemaking) as the policy is currently worded. In reality this would not be feasible for all developments and therefore the wording 'where relevant' should be included.	Incorporate 'where relevant' into SP3.	
	Policy SP4 (mitigating the impact of climate change) requires all development proposals to make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change. BDW has concerns with the requirements of this policy and how it will be measured as this is not clear, alongside the associated financial implications.	Query on how SP4 will be implemented and measured.	Comments noted, although, as specified within SP4, all applications for developm demonstrate how they contribute to climate change mitigation and adaption throug based policies. The criteria within SP4 require development to both mitigate and adap minimising its underlying causes and planning for its consequences.
136 6	Policy PLA1: Porthcawl Waterfront, Porthcawl Regeneration Growth Area Llanmoor provides comments on the proposal for Land East of Pyle under Question 10 in relation to the key proposals for Porthcawl, Pyle and North Cornelly. The main change sought to the emerging policy would be the dates identified in the phasing tranche as it is considered that phasing shown in the housing trajectory is optimistic and that the first phase would not come forward until 2027-28 at the earliest.	Change to housing trajectory for Porthcawl Waterfront.	The total housing provision, and spatial distribution thereof, has been subject to site- enable development of the housing trajectory. The trajectory was prepared initially the respective site-promoters, followed by effective collaboration and involvement w at a Stakeholder Group Meeting. As documented within the Housing Trajectory Bac no outstanding matters of disagreement on the completion figures or the timing and period (including those sites with planning permission and new housing allocations) Stakeholder Group Meeting. Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subje of its sustainability, deliverability and viability credentials in the same manner as all of has been a substantial change in circumstances to demonstrate the site can be deliv LDP period, as indicated within the housing trajectory. The Council has now purch over Phase 1 (Salt Lake), coastal defence works are progressing on site and are of end of 2022. Partnership options are currently being explored in order to bring forwa has commenced in relation to procurement mechanisms and a formal procureme commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted b owner and a significant majority of the site is not reliant on coastal defence work owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now nor be unable to progress and come forward together, as further evidenced by the extens evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bo supported.
	Policy PLA2: Land South of Bridgend (Island Farm), Bridgend Sustainable Growth Area Llanmoor provide comments on the proposal for Land South of Bridgend under Question 13 in respect of the key proposals for Bridgend and Pencoed. The main		As documented in the Candidate Site Assessment, the Land South of Bridgend (Isla robustly demonstrated delivery in accordance with the requirements set out in the D A detailed plethora of evidence has been provided to the Council to support its delive investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close of

oment proposals must clearly ugh application of the criteria apt to climate change, thereby

te-specific phasing analysis to ly through close dialogue with t with a range of stakeholders background Paper, there were nd phasing of sites in the plan hs) following conclusion of the

bject to robust re-assessment II other candidate sites. There elivered over the Replacement rchased and has total control e due to be completed by the ward development, initial work nent exercise is scheduled to d by the Council and a private orks to come forward. A lande is likely to be brought to the preason why both phases will ensive supporting deliverability both unsubstantiated and not

sland Farm) site promoter has e Development Plans Manual. ivery, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new e dialogue with the respective

change sought to the emerging policy would be the dates identified in the phasing tranche as it is considered that phasing shown in the housing trajectory is optimistic and the first phase would not come forward until 2027-28 at the earliest with the remainder being moved back to 2028-2033.		site-promoters, followed by effective collaboration and involvement with a range of sta Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasing of sites those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land South of Bridgend (Island unsubstantiated and not supported.
Policy PLA3: Land West of Bridgend, Bridgend Sustainable Growth Area Llanmoor supports placemaking Policy PLA3 Land West of Bridgend Sustainable Growth Area. As previously demonstrated in written submissions to the Candidate Sites process and representations to the PS, Llanmoor have demonstrated that the land west of Bridgend is viable and deliverable. Further commentary relevant to Land West of Bridgend is set provided in relation to Question 13 in respect of comments on the key proposals for Bridgend and Pencoed.	No proposed changes.	Comments noted.
Policy PLA4: Land East of Pencoed, Pencoed Sustainable Growth Area Llanmoor provides comments on the proposal for Land South of Bridgend under Question 13 in respect of the key proposals for Bridgend and Pencoed. The main change sought to the emerging policy would be the dates identified in the phasing tranche as it is considered that phasing shown in the housing trajectory is optimistic and that the first phase would not come forward until 2027-28, at the earliest.	Change to housing trajectory for Land East of Pencoed.	As documented in the Candidate Site Assessment, the Land East of Pencoed demonstrated delivery in accordance with the requirements set out in the Developme plethora of evidence has been provided to the Council to support its delivery investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has provided to the site is realistically deliverable, considering the full plethora of requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close d site-promoters, followed by effective collaboration and involvement with a range of sta Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasing of sites those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land East of Pencoed trajectory is bor supported.
Policy PLA5: Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area Llanmoor provides comments on the proposal on Land East of Pyle under Question 10 in relation to the key proposals for Porthcawl, Pyle and North Cornelly. Whilst Llanmoor consider the allocation of 2,000 dwellings to be a strategic matter that	Land East of Pyle Allocation to be considered via the forthcoming SDP rather than the Replacement LDP	As documented in the Candidate Site Assessment, the Land East of Pyle s demonstrated delivery in accordance with the requirements set out in the Developme plethora of evidence has been provided to the Council to support its delivery investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora of requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close d site-promoters, followed by effective collaboration and involvement with a range of sta

stakeholders at a Stakeholder er, there were no outstanding es in the plan period (including sion of the Stakeholder Group nd Farm) trajectory is both

d site promoter has robustly nent Plans Manual. A detailed ery, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new e dialogue with the respective stakeholders at a Stakeholder er, there were no outstanding es in the plan period (including sion of the Stakeholder Group both unsubstantiated and not

site promoter has robustly nent Plans Manual. A detailed ery, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new e dialogue with the respective stakeholders at a Stakeholder

	should be considered as part of SDP, if the allocation proceeds the main change sought to the emerging Policy PLA4 would be to the dates identified in the phasing tranches. It is considered that phasing shown in the housing trajectory is overly optimistic and in reality, the first phase would not come forward until 2027-28 at the very earliest given the significant infrastructure requirements, with the remainder being moved back to 2028-2033.		<ul> <li>Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasing of sites those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land East of Pencoed trajectory is bosupported.</li> <li>Moreover, work on the SDP has not yet commenced, regulations are yet to be finalis not yet been defined through this process. The Bridgend Replacement LDP is being forthcoming SDP and is bound by a Delivery Agreement. A range of plan preparation in the Review Report before work on the Replacement LDP began. The Review Recouncil undertakes a full review of the existing LDP on an individual Local Planning wherever possible working collaboratively with other LPAs to produce a joint eviden to prepare a SDP. Whilst the Council remains committed to the SDP process, th demonstrated that Land East of Pyle is both viable and deliverable during the R accordance with the Growth and Spatial Strategy. The representor's concerns implications are unsubstantiated, especially considering Bridgend County Borough Council has submitted formal representations on the Bridgend Deposit Plat this proposed allocation and support the Deposit Plan.</li> <li>In addition, the number of dwellings Land East of Pyle is expected to deliver during similar in scale to the other proposed Strategic Sites. Therefore, it is not considered a on site progression until a future SDP is adopted.</li> </ul>
488	No evidence that sustainable value has been delivered on with previous developments. Show me the impact that the well-being future generations act has had on developments in this area.	No evidence that sustainable value has been delivered on with previous developments	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 u 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). Strategic site allocations identified by policies PLA1-PLA5 (See Page 62) detail th including masterplan development principles and development requirements. S pursuing transit-orientated development that prioritises walking, cycling and pur reducing private motor vehicle dependency. Other requirements will include creat infrastructure that facilitates active travel, enhances biodiversity, provides sustain healthy communities. There must be emphasis on retaining existing trees and hed incorporating appropriate landscaping, and protecting biodiversity, providing hab supporting a range of opportunities for formal and informal play in addition to co Buildings will be required to face open spaces and create active street frontages foster a strong sense of place and ensure community safety. Furthermore, Strategic Policy 3: Good Design and Sustainable Placemaking will e contribute to creating high quality, attractive, sustainable places that support active enhance the community in which they are located, whilst having full regard to the environment.
516	Who decides what "is appropriate to the local context"? Hopefully not bureaucrats. Face to face consultation should be on going. Fixing everything in a 10 year plan is in itself a ridiculous idea sure to do more harm than good.	Concerns regarding plan / consultation	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 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).

er, there were no outstanding es in the plan period (including ision of the Stakeholder Group both unsubstantiated and not

lised and site thresholds have ng prepared in advance of the ation options were considered Report recommended that the ng Authority (LPA) area basis, ence base and with the region the site promoter has clearly Replacement LDP period, in ns regarding cross boundary ugh Council has remained in on. Neath Port Talbot County Plan and cite no objections to

ring the Replacement LDP is appropriate to delay progress

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

the site-specific requirements Such requirements include public transport uses, whilst reating multi-functional green ainable drainage and fosters edgerows within public realm, abitats for local species and community-led food growing. es to enhance cohesiveness,

ensure that development will re travel and healthy lives and the natural, historic and built

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

			The Replacement LDP has been prepared in line with the Well-Being of Future Gen a duty on public bodies to carry out sustainable development. The LDP Vision has l account the 7 Well-being Goals and Bridgend's Local Well-being Plan with the spe issues affecting the County Borough. Background Paper 10 (See Appendix Replacement LDP assists in the delivery of the 7 Well-being Goals.
			The Replacement LDP has also been prepared in line with Bridgend Public Server objectives. The Bridgend Well-being Plan outlines the things that Bridgend Public together on over the next five years; our wellbeing objectives and steps, and how 10 years' time. Background Paper 9 (See Appendix 49), demonstrates that the F the delivery of the local well-being plan.
			It is the view of the Council that the overall objectives of the Community Involvement set out in with the approved Delivery Agreement, including the CIS have been met. LDP has been prepared in accordance with the LDP 'Preparation Requirements' Plans Manual (Edition 3).
			The Council previously consulted the public on the Preferred Strategy of which was to 8th November 2019. Following the public consultation period the Council was representations made in accordance with LDP Regulation 16(2) before determining 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 y public participation and to enable the public to have their say in order to deliver the by Borough.
707	It's back to the same thing. A claim that 'high quality well thought out and good design will create sustainable places to live, work and socialise'. What then happened in Bridgend? The money spent on	Concerns regarding employment	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 underpinned by robust evidence to ensure that plans are effective and deliverable an as defined in national policy set out in Planning Policy Wales (PPW).
	pedestrianisation and sorting out the traffic movement created a dead town which is eerie to walk through during the day and scary in the night. Was it good design that created that? It wasn't BCBC's fault that Ford pulled out of Bridgend but what has come in to replace it? Nothing. Are all these housing projects going to attract a highly		The Deposit Plan has been underpinned by the identification of the most appropriat and housing provision, all of which have been based upon well informed, evidence be need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferre Options). A range of growth scenarios across the whole Replacement LDP perio discussed within the Strategic Growth Options Background Paper. This has co Borough's demographic situation is likely to change from 2018-2033 and infor response for the Replacement LDP. As such the Replacement LDP identifies an ap to enable a balanced level of housing and employment provision that will achieve sus
	qualified and skilled workforce who will sit in their new houses patiently waiting for a reputable company to come and set up shop in the area and give them a job (providing they get massive grants of course)? Industry doesn't work like that. People's health and well being will not be improved by having a mortgage on their new house and no job. I speak from experience - I went abroad to work - for		Over 30% of the County Borough's population is projected to be aged 60+ by 2033 growth across this age group, there is likely to be a broad reduction in local econor does not facilitate sustainable levels of economic growth to offset this phenomere therefore seeks to deliver sustainable forms of growth that will attract and retain econor within the County Borough. As justified within the Strategic Growth Options Backgrout and Sustainable Growth Strategy is largely driven by households within the 35-44 projected to support an increase in people in workplace based employment or accommodated through provision of up to 7,500 additional jobs.

enerations Act of which places s been developed to take into becific characteristics and key ( 50) demonstrates that the

ervice Board Well-being Plan Iblic Service Board will work we want Bridgend to look in Replacement LDP assists in

ent Scheme (CIS) as originally t. It is also considered that the s' set out in the Development

as held from 30th September was required to consider all ing the content of the deposit – Preferred Strategy & Initial embers of Council.

ke Deposit public consultation 3 weeks in order to maximise best outcomes for the County

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 formed the most appropriate appropriate plan requirement sustainable patterns of growth.

33. With absolute and relative nomic activity rates if the Plan enon. The Replacement LDP conomically active households ound Paper, the Regeneration 44 age group. This growth is over the Plan period, to be

			-
	decades - to improve my well being! For decades past people moved to where the work is located rather than work moving to where the people are located. The Welsh gov't have, for years, harped on about a joined up public transport system for South Wales and alternative motorway routes around Newport. Consultations, pretty coloured route diagrams, written statements galore, tens of millions of pounds handed out - result - Nothing! I wouldn't pretend it's easy to cure all the problems, it's not, but this constant claim that slapping up buildings and housing everywhere when there are no serious jobs available within the area does nothing for my well being - it just creates slum towns.		A positive employment land response is necessary to achieve an equilibrium betwork skilled labour force and job opportunities in order to stimulate the local to regional econ Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix labour force boost alongside other employment trends including past take up of en- based economic forecasts. The resulting evidence base has informed the scale and need and the land best suited to meet that need over the plan period in the contex and Technical Advice Note 23, justified further in the Employment Background Pape Whilst it is beyond the scope of the LDP to guarantee that employers will come to the SP11 by allocating new employment land for development. Policy ENT2 supports employment function of existing business and employment sites. This will enable a come forward.
779	-	No changes proposed	Comments noted.
847	YES. Under SP3 PLA 1 the Sandy Bay Caravan Park is included . This site was sold by Newton (Porthcawl) Estate Company Limited to the former Porthcawl UDC for use as a holiday caravan park , and was run very successfully by that Council . For reasons not relevant here Ogwr Borough Council closed the site at short notice and placed the property on the market for sale . It was marketed for about 6 weeks , attracted a number of very substantial offers - hundreds of thousands of pounds -but ( for reasons not relevant here ) the highest offer was not accepted. The site is a super location for a caravan park , close to the sea , close to Porthcawl(both other recreational facilities and to the town centre) ; it is in planning terms quite absurd to suggest that Sandy Bay Caravan Park be used for anything other than short term holiday use - as either a caravan park or more likely now an upmarket holiday chalet park (chalets falls within the same planning use class as caravans ). The site for such use , as a vacant site , is unique within the borough- you can have houses anywhere, but not a holiday caravan/chalet park right alongside the beach . You only have to look at the adjoining facility of Trecco Bay to see what can be done , the employment it generates	Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront	Comments noted. The Deposit Plan has been underpinned through the identificati scale of economic growth and housing provision, all of which have been based up based judgements regarding need, demand and supply factors (See Appendix 4 Preferred Strategy Strategic Growth Options). A range of growth scenarios across the period have been analysed and discussed within the Strategic Growth Options Based side of the county Borough's demographic situation is likely to change from the most appropriate response for the Replacement LDP. As such the Repla appropriate plan requirement to enable a balanced level of housing and employmer sustainable patterns of growth, support existing settlements and maximise viable affect 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 existin Maesteg and the Llynfi Valley are still denoted as regeneration priorities the development settlements accords with the site-search sequence outlined in Planning Policy Wa developmental pressure on Best and Most Versatile (BMV) agricultural land. The Replacement LDP apportions sustainable growth towards settlements that alresservices, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See A sustainable settlement hierarchy. Based upon the consideration of a comprehens (2020). During Stage 2 detailed assess based on any specific issues they raised in terms of their deliverability, general location is entities and any specific issues they raised in terms of their deliverability, general location is the state set the criteria in the Candidate Site Assessment Methodology which was previously cor 13 – Candidate Site Assessment Report (2020). During Stage 2 detailed assess based on any specific issues t

tween new homes, a growing economy. The 2019 Economic lix 15) analysed this projected employment land and sector and distribution of employment text of Planning Policy Wales aper, and set out in SP11.

ne area, Policy ENT1 supports rts SP11 by safeguarding the e a range of different sites to

ation of the most appropriate upon well informed, evidence (42 – Background Paper 2: the whole Replacement LDP Background Paper. This has from 2018-2033 and informed placement LDP identifies an ent provision that will achieve affordable housing delivery.

by 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 Wales and seeks to minimise

Iready benefit from significant o enabling transit orientated Appendix 19) to establish a ensive range of variables the of supporting regeneration-led , availability of amenities and

te has been assessed against consulted upon (See Appendix ssment, sites were examined ation, neighbouring land uses,

and the trade it brings to other recreational existing use(s), accessibility, physical character, environmental constraints and opportunities. Site promoters and business outlets in Porthcawl to see the 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 benefit. On the wider front we are now in a Covid world and an environmentally more appropriate were included for allocation in the Deposit Plan. aware world ; there will be far less foreign travel and far more reliance on UK holiday As part of the proposed allocation of Porthcawl Waterfront, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (See Deposit Policy facilities . Further , in the narrow context of this draft plan it is absolutely correct to have PLA1 – Page 63). The provision of new residential units, including affordable dwellings, will enable the delivery a policy of promoting tourism-policy ENT 8of other vital regeneration requirements comprising flood defences, public open space, leisure, enhanced active and of protecting existing sites-ENT 18, but travel links plus education, retail and community facility provision. absurd to suggest building houses on Sandy Bay Caravan Park. The loss of A Placemaking Strategy has been developed and produced of which provides the framework to deliver the Sandy Bay Caravan Park will adversely broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the effect the range and scale of such use in comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of Porthcawl, there is a huge long term complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open demand for such a facility, the site is space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented absolutely suitable (and has been for many with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical years) for such use. Para 5.4.138 suggests development of the waterfront in this manner will improve the attractiveness of the town as a place to live and tourism in Porthcawl is in decline - this is an work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader absurd suggestion ; since Covid when settlement of Porthcawl to thrive and prosper. permitted to open it has been at the highest level of demand for years . All of the best In terms of Salt Lake, development will include a new food store, residential (including affordable housing), economic forecasts suggest (for Covid and supporting commercial uses and leisure. With regards to leisure, an area north of the harbour within Salt Lake for environmental reasons) UK destination will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the holidays are likely in the future to be at a far site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. higher level than for the 30 years pre 2019. Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and To allocate Sandy Bay Caravan Park for better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but anything other than a caravan/chalet park is also act, with others, to set a quality benchmark which will also need to be achieved elsewhere. "living in the past" not the future . As above the site was marketed for 30 days but then Mixed-use development will be encouraged throughout the development. Commercial units will be considered on the ground floor if there is market demand for such uses. Retail uses, restaurants and cafes will be particularly but the Owner has kept it empty for 30 years ; deliberately keeping a site empty is not the encouraged. This mix of uses will help bring life and vitality during the day and into the evening. exception envisaged in TAN 13 so 5.4.139 does not apply . Sandy Bay Caravan Park Sandy Bay will accommodate public open space, residential, education provision and commercial. In terms of should not be even considered for housing open space, Policy PLA1 requires development of Porthcawl Waterfront to incorporate Green Infrastructure and , either in isolation or as part of a wider Outdoor Recreation Facilities of which are to be delivered in accordance with Policy COM10 and Outdoor scheme (which does not include any such Recreation Facilities and New Housing Development Supplementary Planning Guidance. provision) as in doing so it would result in the loss of such a prominent ideally located facility which cannot be replaced in the Borough . The site could (and should) be put on the market for sale as a caravan /chalet park ; it could be sold easily for a 7 figure sum. The planning process should not be used to fund public benefit schemes by incorporating otherwise unacceptable proposals contrary to local and national policy, especially where the planning authority the land owner and the

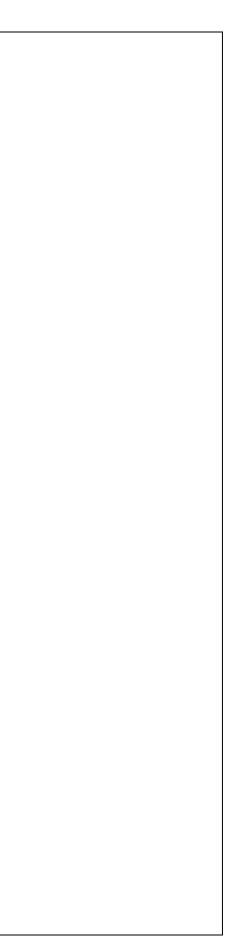
	development promoter are substantially one and the same		
996	No	No changes proposed	Comments noted.
329	any land that that meets PPG and can meet the LVIA on character of a dwelling at the edge of the valley ,in my opinion should be allowed	Any land that that meets planning policy guidance and can meet the landscape visual impact assessment on character of a dwelling at the edge of the valley should be allowed	Comments noted. The Council has reviewed all settlement boundaries within the Co if they are still appropriate in light of the Replacement LDP Strategy and / or we amendments to existing boundaries. This review (See Appendix 38) has informed set the Deposit Replacement LDP. Development that is proposed to take place outside o and into the 'countryside' would be assessed under Policy DNP1: Development in other relevant policies within the Deposit Plan, depending on the nature of the propose that the integrity of the countryside is conserved and enhanced. There is a presumpt the countryside and only in exceptional circumstances will development be acceptable
874	Draft policy PLA8 relates to Transport Proposals. We note that, unlike in the current adopted Local Development Plan, the proposed walking and cycling route between Wildmill and Brackla is not identified as one of the listed Transportation proposals. We note however that Draft Policies SP5 and PLA12 relate to Active Travel. BCBC has produced Active Travel Network Maps that set out detailed plans for a network of active travel routes and facilities in the County Borough over the next 15 years. They identify the walking and cycling routes required to create fully integrated networks for walking and cycling to access work, education, services and facilities. We therefore welcome the fact that the Integrated Network Map identifies the route through our client's site as a future route proposal for an Active Travel Route, between Wildmill Railway Station and Brackla Residential Area (INM-BR-24). This is shown at Figure 1 of our letter dated 20 July 2021. The supporting information identifies the route as a long-term priority for the Council and that the development and delivery of the proposals shown on the INM will be	Change wording of PLA12 from: "Development must maximise walking and cycling access by prioritising the provision within the site, and providing or making financial contributions towards the delivery offsite, of the following measures as appropriate" To "Development proposals that maximise walking and cycling access will be supported including any associated development (such as housing) that helps to	The wording of Policy PLA12 prioritises the provision of active travel measures with and places the emphasis on developers to implement appropriate measures in acc Active Travel Network Map and the Active Travel (Wales) Act 2013. The supporting to clearly state that PLA12 "supports new developments that incorporate well- facilities that will be accessible to all people to walk and cycle for everyday jou elaborates further by stating that priority will be given to proposals that incorporat Paragraph 5.2.84 emphasises the importance of incorporating the measures descri delivery of any strategic site or any proposal. It also describes the means of securing the planning system. If anything, the changes proposed would reduce the emphasis on <u>all</u> developr maximise walking and cycling. Therefore, the change is not considered necessary.

County Borough to determine would constitute appropriate settlement boundaries within e of the settlement boundaries in the Countryside (alongside osal). Policy DNP1 will ensure nption against development in table.

within development proposals accordance with the Council's ing text (para 5.2.79) goes on II-designed safe features and journeys..." Paragraph 5.2.82 prate walking and cycling and scribed in Policy PLA12 in the ng such infrastructure through

opment proposes needing to y.

	Our proposals will also incorporate existing	-	
	route INM-BR-74, which seeks an		
	'enhanced route through dropped kerb	supported where	
	provision, and re-surfacing/enhanced	they enable	
	lighting from Charles Street to Clos-y-	delivery without	
	Waun', also shown at Figure 1. This is	recourse to public	
	identified as a short-term aim.	funding.	
	We note that there will be a concrete	Development	
	We note that there will be a separate consultation on the proposed Active Travel	proposals must prioritise the	
	Network Map between July and October	provision within	
	2021, after which the final network map will	the site, and/or	
	be submitted to the Welsh Government for	provide or make	
	approval. Please contact us when this	financial	
	consultation starts.	contributions	
		towards the	
	Draft Strategic Policy SP3 seeks to	delivery offsite, of	
	maximise opportunities for active travel and	the following	
	increased public transport use and promote	measures as	
	connections within and outside the site to	appropriate"	
	ensure efficient and equality of access for		
	all. Similarly, Draft Policy SP5 is worded to		
	enhance and expand the active travel		
	networks identified in the Council's Existing		
	Routes Map and Active Travel Network		
	Maps, including links to those networks as		
	a means of improving connectivity. We		
	welcome these policies and their wording.		
	The Active Travel policy itself, Draft Policy		
	PLA12 states that:		
	"Development must maximise walking and		
	cycling access by prioritising the provision		
	within the site, and providing or making		
	financial contributions towards the delivery		
	offsite, of the following measures as		
	appropriate		
	2) Delivery of proposals identified within		
	the Council's Active Travel Network Map;		
	3) Improvements, connections, and/or		
	extensions to: a) Routes and proposals		
	identified on the Existing Routes Map and		
	Active Travel Network Map…"		
	The supporting text at percerces 5.2.91		
	The supporting text at paragraph 5.2.81		
	states that <i>"opportunities should be</i>		
	maximised to further improve upon these routes, providing walking connections which		
L		1	1



	will allow integration between new developments and existing communities."		
	We welcome the wording in Draft Policy PLA12 and consider it important that the policy's wording maximises provision with <u>sites</u> of the delivery of the Active Travel Network Map where possible, as our proposal would do. We also consider that the policy should go further and specifically encourage supporting development that will help to enable the Active Travel Network. It should also recognise that encouraging enabling development will allow the network to be developed without needing public funds to support it, ensuring quicker delivery of the Network.		
	Therefore, the first part of policy PLA12 should read:		
	"Development proposals that maximise walking and cycling access will be supported including any associated development (such as housing) that helps to enable the provision of Active Travel routes. They will be particularly supported where they enable delivery without recourse to public funding. Development proposals must prioritise the provision within the site, and/or provide or make <del>Development must maximise walking</del> and cycling access by prioritising the provision within the site, and providing or making financial contributions towards the delivery offsite, of the following measures as appropriate"		
223	Policy PLA1: Porthcawl Waterfront, Porthcawl Regeneration Growth Area Llanmoor provides comments on the proposal for Land East of Pyle under Question 11 in relation to the key proposals for Porthcawl, Pyle and North Cornelly. The main change sought to the emerging policy would be the dates identified at the phasing tranche as it is considered that phasing shown in the housing trajectory is optimistic and reality is the first phase would not come forward until 2027-28 at the earliest.	Change to housing trajectory for Porthcawl Waterfront.	The total housing provision, and spatial distribution thereof, has been subject to site enable development of the housing trajectory. The trajectory was prepared initially the respective site-promoters, followed by effective collaboration and involvement at a Stakeholder Group Meeting. As documented within the Housing Trajectory Ba no outstanding matters of disagreement on the completion figures or the timing an period (including those sites with planning permission and new housing allocations Stakeholder Group Meeting. Further to this, an additional Stakeholder Group Meeting was held on 27th May 202 the meeting and did not cite any concerns or objections regarding the housing traje subject to further public scrutiny and there are no outstanding matters of dispute.

site-specific phasing analysis to ally through close dialogue with ent with a range of stakeholders Background Paper, there were and phasing of sites in the plan ions) following conclusion of the

2022. The representor attended ajectory. Therefore, it has been

<ul> <li>Policy PLA2: Land South of Bridgend (Island Farm), Bridgend Sustainable Growth Area</li> <li>Llanmoor provide comments on the proposal for Land South of Bridgend under Question 13 in respect of the key proposals for Bridgend and Pencoed. The main change sought to the emerging policy would be the dates identified at the phasing tranche as it is considered that phasing shown in the housing trajectory is optimistic and in reality the first phase would not come forward until 2027-28 at the earliest with the remainder being moved back to 2028-2033.</li> <li>Policy PLA3: Land West of Bridgend, Bridgend Sustainable Growth Area Llanmoor supports placemaking Policy PLA3 Land West of Bridgend Sustainable Growth Area. As previously demonstrated in written submissions to the Candidate Sites submissions and representations to the PS, Llanmoor have demonstrated that the land west of Bridgend is viable and deliverable. Further commentary relevant to Land West of Bridgend is provided in relation to Question 13 in respect of comments on the key proposals for</li> </ul>	for Land South of Bridgend (Island Farm).	Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subje- of its sustainability, deliverability and viability credentials in the same manner as all o has been a substantial change in circumstances to demonstrate the site can be deliv LDP period, as indicated within the housing trajectory. The Council has now purch over Phase 1 (Salt Lake), coastal defence works are progressing on site and are d end of 2022. Partnership options are currently being explored in order to bring forwar has commenced in relation to procurement mechanisms and a formal procuremer commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly prometed by owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no re be unable to progress and come forward together, as further evidenced by the extens evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bot supported. As documented in the Candidate Site Assessment, the Land South of Bridgend (Islar robustly demonstrated delivery in accordance with the requirements set out in the D A detailed plethora of evidence has been provided to the Council to support its delive investigations and appraisals, masterplans, a viability assessment, a transpo consideration of s106 requirements, infrastructure and costs. This process has p confidence that the site is realistically deliverable, considering the full plethora of equirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close di site-promoters, followed by effective collaboration and involvement with a range of sites i those sites with planning permission and new housing allocations) following conclusio (Meeting. As such, the proposed change to Land South of Bridgend (Island unsubstantiated and not supported.
Bridgend and Pencoed. Policy PLA4: Land East of Pencoed, Pencoed Sustainable Growth Area		As documented in the Candidate Site Assessment, the Land East of Pencoed s demonstrated delivery in accordance with the requirements set out in the Development

ject to robust re-assessment I other candidate sites. There livered over the Replacement chased and has total control e due to be completed by the vard development, initial work ent exercise is scheduled to by the Council and a private this to come forward. A landis likely to be brought to the reason why both phases will nsive supporting deliverability both unsubstantiated and not

and Farm) site promoter has Development Plans Manual. very, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new dialogue with the respective stakeholders at a Stakeholder er, there were no outstanding is in the plan period (including sion of the Stakeholder Group and Farm) trajectory is both

site promoter has robustly nent Plans Manual. A detailed

	Llanmoor provides comments on the proposal for Land South of Bridgend under Question 13 in respect of the key proposals for Bridgend and Pencoed. The main change sought to the emerging policy would be the dates identified at the phasing tranche as it is considered that phasing shown in the housing trajectory is optimistic and reality is the first phase would not come forward until 2027-28 at the earliest. Policy	Pencoed.	plethora of evidence has been provided to the Council to support its delivery investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora of requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close d site-promoters, followed by effective collaboration and involvement with a range of sta Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasing of sites those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land East of Pencoed trajectory is bo supported.
	PLA5: Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area Llanmoor provides comments on the proposal on Land East of Pyle under Question 11 in relation to the key proposals for Porthcawl, Pyle and North Cornelly. Whilst Llanmoor consider the allocation of 2,000 dwellings to be a strategic matter that should be considered as part of SDP, if the allocation proceeds the main change sought to the emerging Policy PLA4 would be to the dates identified at the phasing tranche. It is considered that phasing shown in the bousing trainectory is overly optimistic	Allocation to be considered via the forthcoming SDP rather than the Replacement LDP	As documented in the Candidate Site Assessment, the Land East of Pyle s demonstrated delivery in accordance with the requirements set out in the Development plethora of evidence has been provided to the Council to support its delivery investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora of requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close d site-promoters, followed by effective collaboration and involvement with a range of sta Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasing of sites those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land East of Pencoed trajectory is bo supported.
	in the housing trajectory is overly optimistic and reality is the first phase would not come forward until 2027-28 at the very earliest and subject to significant infrastructure, with the remainder being moved back to 2028- 2033.		Moreover, work on the SDP has not yet commenced, regulations are yet to be finalis not yet been defined through this process. The Bridgend Replacement LDP is being forthcoming SDP and is bound by a Delivery Agreement. A range of plan preparation in the Review Report before work on the Replacement LDP began. The Review Re Council undertakes a full review of the existing LDP on an individual Local Planning wherever possible working collaboratively with other LPAs to produce a joint evident to prepare a SDP. Whilst the Council remains committed to the SDP process, the demonstrated that Land East of Pyle is both viable and deliverable during the Re accordance with the Growth and Spatial Strategy. The representor's concerns implications are unsubstantiated, especially considering Bridgend County Boroug dialogue with Neath Port Talbot County Borough Council through plan preparation Borough Council has submitted formal representations on the Bridgend Deposit Plat this proposed allocation and support the Deposit Plan.
			In addition, the number of dwellings Land East of Pyle is expected to deliver durin similar in scale to the other proposed Strategic Sites. Therefore, it is not considered an on site progression until a future SDP is adopted.
61	0 Yes unless you're planning to provide an extra GP surgery and employ more nurses and GP's then the community will suffer	Concerns regarding provision of GP Surgeries	In relation to the provision of additional GP surgeries, the Council has been engaging University Health Board from the outset of the Replacement LDP process. Early me the level and spatial distribution of growth proposed was clarified to help facilitate alig

ery, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new e dialogue with the respective stakeholders at a Stakeholder er, there were no outstanding es in the plan period (including sion of the Stakeholder Group both unsubstantiated and not

site promoter has robustly nent Plans Manual. A detailed ery, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new e dialogue with the respective stakeholders at a Stakeholder er, there were no outstanding es in the plan period (including sion of the Stakeholder Group both unsubstantiated and not

lised and site thresholds have ng prepared in advance of the ation options were considered Report recommended that the ng Authority (LPA) area basis, ence base and with the region the site promoter has clearly Replacement LDP period, in as regarding cross boundary ugh Council has remained in on. Neath Port Talbot County Plan and cite no objections to

ring the Replacement LDP is appropriate to delay progress

ing with Cwm Taf Morgannwg meetings were held to ensure alignment of service provision.

			As part of Stage 3 of the Candidate Site Assessment, the health board amongst oth invited to provide comments in respect of those sites identified as suitable for future allocation in the Deposit LDP. Whilst the Council cannot ultimately control prov services, close working relationships will continue and be maintained with Cwm Health Board. This will be key to service provision planning as site allocations within
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	No specific comments to make.	None	Comments noted
400	Jehu support the provision of 9,207 homes set out in the sustainable housing strategy under Policy SP6 as it includes 1,532 dwelling over allocation / 20% flexibility allowance which is considered appropriate to ensuring delivery of housing across the RLDP period. Jehu also agree development should be distributed to sustainable locations in accordance with the regeneration and sustainable growth strategy provided in Policy SP1 to ensure an appropriate and sustainable supply of housing that reflects the evidence base set out in the Settlement Hierarchy and Spatial Strategy background paper. Jehu acknowledge that the housing requirement will be met through numerous strands of housing supply, including land bank commitments, windfall sites and new housing allocations which is reflected within	proposed – support the housing requirements and flexibility allowance.	Comments noted.
554	Policy COM1 and the Housing Trajectory Background Paper. There are so many issues at the maesteg	No changes	The LDP Spatial strategy (See Appendix 43 – Background Paper 3) prioritises the d
	washers site already by having more houses will only increase these problems and issues	proposed – concerns over Maesteg Washery site	on the periphery of sustainable urban areas, primarily on previously developed bro focus on the delivery of the brownfield regeneration allocations identified in the exis Maesteg and the Llynfi Valley are still denoted as regeneration priorities thr 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. The Maesteg Washery site (Policy COM1 (R3)) presents a significant opportunity for the area and would play a significant step in the revitalisation of Maesteg. The L brownfield regeneration site will require remediation-based viability issues to be addr forward and the site is in an area characterised by low house prices and little deve the site is allocated as a long-term regeneration site, which the Council will remain of to help deliver the housing requirement. In this way, the remediation strategy, new

other consultation bodies were ture development and possible rovision of primary healthcare vm Taf Morgannwg University thin the Deposit Plan progress.

e development of land within or prownfield sites. It continues to existing LDP, hence, Porthcawl, through their designation as nent opportunities within these Wales and seeks to minimise

y for the future regeneration of e LDP acknowledges that this ddressed before it can be taken evelopment activity. Therefore in committed to, but not rely on necessary enabling works and

			master planning can be progressed in a manner that ensures the future redevelopm greatest positive impact on the surrounding community.
287	Support - please see covering letter submitted	No changes proposed – support	Comments noted
308	Policy PLA1: Porthcawl Waterfront, Porthcawl Regeneration Growth Area Llanmoor provides comments on the proposal for Land East of Pyle under Question 10 in relation to the key proposals for Porthcawl, Pyle and North Cornelly. The main change sought to the emerging policy would be the dates identified in the phasing tranche as it is considered that phasing shown in the housing trajectory is optimistic and that the first phase would not come forward until 2027-28 at the earliest.	Change to housing trajectory for Porthcawl Waterfront.	The total housing provision, and spatial distribution thereof, has been subject to site- enable development of the housing trajectory. The trajectory was prepared initially the respective site-promoters, followed by effective collaboration and involvement wat a Stakeholder Group Meeting. As documented within the Housing Trajectory Bac no outstanding matters of disagreement on the completion figures or the timing and period (including those sites with planning permission and new housing allocations) Stakeholder Group Meeting. Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subjec of its sustainability, deliverability and viability credentials in the same manner as all of has been a substantial change in circumstances to demonstrate the site can be deliv LDP period, as indicated within the housing trajectory. The Council has now purch over Phase 1 (Salt Lake), coastal defence works are progressing on site and are of end of 2022. Partnership options are currently being explored in order to bring forwa has commenced in relation to procurement mechanisms and a formal procurement commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted bo owner and a significant majority of the site is not reliant on coastal defence works owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now nor be unable to progress and come forward together, as further evidenced by the extens evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bo supported.
	Policy PLA2: Land South of Bridgend (Island Farm), Bridgend Sustainable Growth Area Llanmoor provide comments on the proposal for Land South of Bridgend under Question 13 in respect of the key proposals for Bridgend and Pencoed. The main change sought to the emerging policy would be the dates identified in the phasing tranche as it is considered that phasing shown in the housing trajectory is optimistic and the first phase would not come forward until 2027-28 at the earliest with the remainder being moved back to 2028-2033.	Change to housing trajectory for Land South of Bridgend (Island Farm).	As documented in the Candidate Site Assessment, the Land South of Bridgend (Isla robustly demonstrated delivery in accordance with the requirements set out in the D A detailed plethora of evidence has been provided to the Council to support its deliver investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has provided to the full plethora of requirements, infrastructure and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close d site-promoters, followed by effective collaboration and involvement with a range of sta Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasing of sites those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land South of Bridgend (Island unsubstantiated and not supported.
	Policy PLA3: Land West of Bridgend, Bridgend Sustainable Growth Area Llanmoor supports placemaking Policy PLA3 Land West of Bridgend Sustainable Growth Area. As previously demonstrated in written submissions to the Candidate	No proposed changes.	Comments noted.

ment of the site can have the

te-specific phasing analysis to by through close dialogue with t with a range of stakeholders background Paper, there were and phasing of sites in the plan has) following conclusion of the

bject to robust re-assessment Il other candidate sites. There elivered over the Replacement rchased and has total control e due to be completed by the ward development, initial work nent exercise is scheduled to d by the Council and a private rks to come forward. A landis likely to be brought to the preason why both phases will ensive supporting deliverability both unsubstantiated and not

sland Farm) site promoter has a Development Plans Manual. ivery, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new e dialogue with the respective stakeholders at a Stakeholder er, there were no outstanding es in the plan period (including sion of the Stakeholder Group nd Farm) trajectory is both

Sites process and representations to the PS, Llanmoor have demonstrated that the land west of Bridgend is viable and deliverable. Further commentary relevant to Land West of Bridgend is set provided in relation to Question 13 in respect of comments on the key proposals for Bridgend and Pencoed.		
Policy PLA4: Land East of Pencoed, Pencoed Sustainable Growth Area Llanmoor provides comments on the proposal for Land South of Bridgend under Question 13 in respect of the key proposals for Bridgend and Pencoed. The main change sought to the emerging policy would be the dates identified in the phasing tranche as it is considered that phasing shown in the housing trajectory is optimistic and that the first phase would not come forward until 2027-28, at the earliest.	Change to housing trajectory for Land East of Pencoed.	As documented in the Candidate Site Assessment, the Land East of Pencoed demonstrated delivery in accordance with the requirements set out in the Development plethora of evidence has been provided to the Council to support its delivery investigations and appraisals, masterplans, a viability assessment, a transpic consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora or requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close or site-promoters, followed by effective collaboration and involvement with a range of star Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasing of sites those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land East of Pencoed trajectory is bost supported.
Policy PLA5: Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area Llanmoor provides comments on the proposal on Land East of Pyle under Question 10 in relation to the key proposals for Porthcawl, Pyle and North Cornelly. Whilst Llanmoor consider the allocation of 2,000 dwellings to be a strategic matter that should be considered as part of SDP, if the allocation proceeds the main change sought to the emerging Policy PLA4 would be to the dates identified in the phasing tranches. It is considered that phasing shown in the housing trajectory is overly optimistic and in reality, the first phase would not come forward until 2027-28 at the very earliest given the significant infrastructure requirements, with the remainder being moved back to 2028-2033.	Land East of Pyle Allocation to be considered via the forthcoming SDP rather than the Replacement LDP	As documented in the Candidate Site Assessment, the Land East of Pyle s demonstrated delivery in accordance with the requirements set out in the Developmer plethora of evidence has been provided to the Council to support its delivery investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close of site-promoters, followed by effective collaboration and involvement with a range of st Group Meeting. As documented within the Housing Trajectory Background Paper matters of disagreement on the completion figures or the timing and phasing of sites those sites with planning permission and new housing allocations) following conclusio Meeting. As such, the proposed change to Land East of Pencoed trajectory is bo supported. Moreover, work on the SDP has not yet commenced and site thresholds have not ye process. The Bridgend Replacement LDP is being prepared in advance of the fort by a Delivery Agreement. A range of plan preparation options were considered in the on the Replacement LDP began. The Review Report recommended that the Counc the existing LDP on an individual Local Planning Authority (LPA) area basis, collaboratively with other LPAs to produce a joint evidence base and with the regic the Council remains committed to the SDP process, the site promoter has clearly di of Pyle is both viable and deliverable during the Replacement LDP period, in accord Spatial Strategy. The representor's concerns regarding cross boundary implica- especially considering Bridgend County Borough Council has remained in dialog County Borough Council through plan preparation. Neath Port Talbot County Borough County Borough Council through plan preparation.

ed site promoter has robustly ment Plans Manual. A detailed ery, including numerous site asport assessment and due as provided a high degree of a of associated development to deliver high-quality new e dialogue with the respective stakeholders at a Stakeholder er, there were no outstanding es in the plan period (including usion of the Stakeholder Group both unsubstantiated and not

e site promoter has robustly ment Plans Manual. A detailed ery, including numerous site asport assessment and due as provided a high degree of a of associated development to deliver high-quality new e dialogue with the respective stakeholders at a Stakeholder ber, there were no outstanding es in the plan period (including usion of the Stakeholder Group both unsubstantiated and not

yet been defined through this orthcoming SDP and is bound he Review Report before work ncil undertakes a full review of , wherever possible working gion to prepare a SDP. Whilst demonstrated that Land East cordance with the Growth and ications are unsubstantiated, logue with Neath Port Talbot prough Council has submitted

			formal representations on the Bridgend Deposit Plan and cite no objections to the support the Deposit Plan. In addition, the number of dwellings Land East of Pyle is expected to deliver durin similar in scale to the other proposed Strategic Sites. Therefore, it is not considered ap on site progression until a future SDP is adopted.
400	Policy SP6: Sustainable Housing Strategy Jehu support the provision of 9,207 homes set out in the sustainable housing strategy under Policy SP6 as it includes 1,532 dwelling over allocation / 20% flexibility allowance which is considered appropriate to ensuring delivery of housing across the RLDP period. Jehu also agree development should be distributed to sustainable locations in accordance with the regeneration and sustainable growth strategy provided in Policy SP1 to ensure an appropriate and sustainable supply of housing that reflects the evidence base set out in the Settlement Hierarchy and Spatial Strategy background paper. Jehu acknowledge that the housing requirement will be met through numerous strands of housing supply, including land bank commitments, windfall sites and new housing allocations which is reflected within Policy COM1 and the Housing Trajectory Background Paper.	None – support the housing requirements and flexibility allowance.	Comments noted (refer to Housing Trajectory Background Paper).
105	Policy SP6: Sustainable Housing Strategy The landowners support the provision of 9,207 homes set out in the sustainable housing strategy under Policy SP6 as it includes 1,532 dwelling over allocation / 20% flexibility allowance which is considered appropriate to ensuring delivery of housing across the RLDP period. The landowners also agree development should be distributed to sustainable locations in accordance with the regeneration and sustainable growth strategy provided in Policy SP1 to ensure an appropriate and sustainable supply of housing that reflects the evidence base set out in the Settlement Hierarchy and Spatial Strategy background paper. The landowners acknowledge and support that the housing requirement will be met through numerous strands of housing supply, including land bank commitments,	None – support the Growth Strategy, Spatial Strategy and allocation of Parc Afon Ewenni (COM1(1)).	Comments noted. In terms of Parc Afon Ewenni, the Council has now removed the site from the housing and subsequent uncertainty relating to delivery timescales. The Candidate Site Ass been updated to reflect this change, of which states that 'the site is located within Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The allocation from the existing LDP (REG1(6)) and is proposed to be developed for uses. However, the Council's Strategic Flood Consequences Assessment identifies vulnerable to flood risk. As such, the site will not therefore be allocated for develo LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewenni due to th timescales as a result of flood risk.

## this proposed allocation and

## rring the Replacement LDP is appropriate to delay progress

sing trajectory due to flood risk Assessment (2022) report has hin the settlement boundary of The site represents a 'Rollover' for commercial and residential fies that the site is significantly velopment in the Replacement of the uncertainty over delivery

	windfall sites and new housing allocations which are identified in COM1. The landowners support the rolling of specific allocations from the extant plan period in this context, as the allocation of land at Parc Afon Ewenni is supported by clear evidence that circumstances have changes and that the site is viable and will be delivered over the RLDP.		
253	The Deposit Draft RLDP identifies three strategic policies (SP3, SP4 and SP5) which together relate to design, placemaking, climate change, transport and accessibility. These are not considered to be contentious and effectively repeat guidance contained within PPW. BDW therefore suggest that national policy provides sufficient guidance and control on design, placemaking, and sustainable transport grounds and accordingly these policies could be considered to be superfluous.	Remove local policies on design, placemaking, climate change, transport and accessibility and defer to national policies.	Whilst the comments are noted, these policies are considered fundamental ach Objectives of the Replacement LDP and to deliver sustainable development in a sustainable places and maximise the well-being of Bridgend County Borough's resi As such, the representor's comment that "these policies could be considered to be su
	BDW also have concerns that it may not be possible for all developments to comply with all 14 of the criteria listed in Policy SP3 (good design and placemaking) as the policy is currently worded. In reality this would not be feasible for all developments and therefore the wording 'where relevant' should be included.	Incorporate 'where relevant' into SP3.	Comments noted, although the policy is considered appropriate in the current for necessary.
	Policy SP4 (mitigating the impact of climate change) requires all development proposals to make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change. BDW has concerns with the requirements of this policy and how it will be measured as this is not clear, alongside the associated financial implications.	Query on how SP4 will be implemented and measured.	Comments noted, although, as specified within SP4, all applications for developm demonstrate how they contribute to climate change mitigation and adaption through based policies. The criteria within SP4 require development to both mitigate and adap minimising its underlying causes and planning for its consequences. No action cons
	Policy PA11 Parking Standards is not considered to be consistent with PPW 11 and the associated transport hierarchy given that we are aware that the Highway Department of the LPA tend to seek maximise provision of car parking in accordance with adopted standards which	Challenge PLA11 for not being in accordance with the transport hierarchy.	PLA11 is a Development Management Policy that supports delivery of SP5: 3 Accessibility. The first criterion within proposed SP5 is for development to accord wi hierarchy for planning, which is consistent with Planning Policy Wales. PLA 11's su further recognises that "the availability of parking spaces and parking charges applied a reduction in journeys by private car and encouraging a change in mode choice means of travel". Further local guidance will be provided in a revised future Parking considered necessary.

chieve the Vision, Aims and a manner that will achieve esidents and its communities. superfluous" is not supported. form. No action considered pment proposals must clearly ugh application of the criteria-dapt to climate change, thereby onsidered necessary. 5: Sustainable Transport and with the sustainable transport s supporting paragraph 5.2.76 lied, are key tools in facilitating ice towards more sustainable ng Standards SPG. No action

	can lead to developments dominated by car parking.		
170	Policy SP3 The HBF considered that the phrase/requirement for 'Good Design' needs to be defined more clearly. The HBF suggest it's unlikely for all sites to meet all the criteria, this needs to be made clear in the wording of the policy or the supporting text. Further, the supporting text needs to be clear that the level of placemaking achievable by development is linked to the scale of the development and to the location of the allocation.	Enhanced clarity on Good Design within SP3	The Replacement LDP seeks to maximise its contribution to well-being through Su Good Design, in accordance with Planning Policy Wales and the definitions there comments are noted, the policy is considered appropriate. No action is considered in
	PLA7: Development West of the Railway Line, Pencoed - The HBF questions why there is a need for this policy if the land is not allocated or within the settlement boundary.	Query on rationale for PLA7	The rationale for this policy is clearly documented in the Development West of Background Paper. This paper makes use of several recent studies focussed on the h to determine the requirement for the existing moratorium on development, as prese existing adopted LDP, to be retained in the Replacement LDP. Significant assessme developing a solution which is likely to require major interventions to include the of level crossing as well as a replacement Penprysg Road bridge with significantly im travel infrastructure. However, the available solutions are subject to many constrait overcome through further assessment and design and will require collaboration of set There are also restrictions in terms of funding, with no existing guarantees that the intervention can be met over the replacement plan period. It is therefore concluded the moratorium in Pencoed should be retained within the revised Local Development suitable transport intervention materialises.
	The detailed requirements for the larger strategic site's development requirements require affordable housing in clusters of no more than 10 units. The HBF considers this figure should be more flexible to allow for each site to be different and also the requirements of the RSL's who from experience often have management issues on smaller clusters.	Remove requirement for affordable housing in clusters of no more than 10 units.	As outlined in the Affordable Housing Background Paper, in order to facilitate creat the Replacement LDP seeks to deliver affordable housing secured through section clusters of no more than ten affordable units, interspersed throughout the respective the representor's statement, a cluster of 10 affordable units is not considered a 'sm creating sustainable, balanced, mixed-tenure communities. Rather, it is designed issues that can otherwise result from single units being 'pepper potted' throughout discrete clusters of more than 10 affordable units can become increasingly uncon maintenance of balanced, mixed tenure communities due to over-concentration of a balance has to be achieved and clusters of no more than 10 affordable units is con Therefore, the representor's proposal is not supported.
	The HBF notes an inconstancy on figures Table 6 Porthcawl 1,277 units whereas PLA1: Porthcawl Waterfront 1,115 units.	Proposal to correct an apparent inconsistency between Table 6 and PLA 1.	Table 6 is not intended to match PLA1. Table 6 documents the total housing provision total documented in Table 7. This includes the contribution identified from the P referenced in PLA1 and also includes existing landbank commitments. This will accordance with the housing trajectory as the plan progresses.
116 5	Our clients do not object to Policy COM1 (Housing Allocations), in principle, and welcome the Local Planning Authority's approach which consists of focusing on the	Porthcawl Waterfront and	The justification for the Spatial Strategy is documented in the Spatial Strategy Option Strategy is considered to best align with this Vision and also the Key Issues, Drive Specific Objectives the Replacement LDP is seeking to address. It is considered accommodating the level of growth identified in the Strategic Growth Options B

Sustainable Placemaking and erein. Whilst the representor's ed necessary.

of the Railway Line, Pencoed e highway network in Pencoed escribed by Policy PLA6 in the nent has been undertaken into e closure of the Hendre Road improved capacity and active raints which would need to be several statutory undertakers. t the required costs for major I that the existing development ent Plan 2018 - 2033 until a

reation of mixed communities, ction 106 through sustainable tive developments. Contrary to small cluster' in the context of ned to minimise management out developments. Conversely, conducive to the delivery and of affordable tenures. A careful considered optimal to this end.

sion by Settlement, akin to the Porthcawl Waterfront site as rill continue to be updated in

tions Background Paper. The vers, Strategic Objectives and nsidered most conducive to Background Paper and also

<b></b>	dolivony of stratagic sites and large housing	as Long Torm	delivering this growth through sustainable patterns of development that accord with
	delivery of strategic sites and large housing allocations. However, the applicant wishes	as Long-Term Regeneration	delivering this growth through sustainable patterns of development that accord with placemaking principles. It will maximise affordable housing delivery in high-ne
	to object primarily relating to concern of the	Sites.	sustainable development, enable delivery of significant remaining brownfield sites i
	deliverability of some of the sites selected	Chool	search sequence and seek to minimise pressure on BMV agricultural land, subject to
	for consideration as an allocation which, if		
	fail, will fundamentally impact the		Two existing large scale brownfield regeneration sites have been proposed for re-all
	requirement to deliver much-needed		and Porthcawl Waterfront) within the Replacement LDP, both of which are considered
	housing (both market and affordable) and		of housing supply to enable delivery of the housing requirement. Before being 'rolle
	the need to alleviate the 'continuing		Plan, both sites were subject to robust re-assessment of their sustainability, deliverab
	difficulties younger households face in		in the same manner as all other candidate sites. In both cases, there has been
	accessing home ownership', as outlined in		circumstances to demonstrate the sites can be delivered over the Replacement LDP
	the LHMA (2021) which have been		the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Str
	exacerbated by recent events, including		Paper and Candidate Site Assessment).
	Brexit and the pandemic.		
			The total housing provision, and spatial distribution thereof, has also been subje
	Firstly, and as above, it should be noted that		analysis to enable development of the housing trajectory. The trajectory was prepared
	the clients support the overall housing		dialogue with the respective site-promoters, followed by effective collaboration and in
	strategy proposed by BCBC and support the		stakeholders at a Stakeholder Group Meeting. As documented within the Housing Tra
	focus on the larger, strategic sites as it is		there were no outstanding matters of disagreement on the completion figures or the
	evident that these will be crucial in the		in the plan period (including those sites with planning permission and new hou
	delivery of much-needed housing in the		conclusion of the Stakeholder Group Meeting. In summary therefore, the proposal to a
	County Borough. The objection to Policy		Porthcawl Waterfront to Long-Term Regeneration Allocations is both unsubstantiated
	COM1 in this instance relates to queries		
	over the deliverability of some of the sites		
	proposed for allocations if these fail or do		
	not deliver the numbers expected, would		
	see the proposed LDP fail by these sites not		
	supporting the delivery of the strategic		
	ambitions of BCBC.		
	General over-reliance on previously		
	developed / brownfield sites		
	developed / brownield sites		
	Our client wishes to make the general		
	observation that the currently drafted		
	Deposit Plan does have a general 'over-		
	reliance' upon previously developed		
	brownfield sites – such sites are inherently		
	difficult to start and the two brownfield sites		
	to be re-allocated (SP2(1) Porthcawl		
	Waterfront and COM1(1) Parc Afon Ewenni,		
	haven't delivered (sufficiently) to-date.		
	Therefore, a general point of these site's		
	lack of delivery through the previous (and		
	current) plan period, should these sites be		
	attributed towards housing numbers given		
	the lack of on-site delivery to-date? It is		
	suggested these be re-considered as 'Long-		
	Term Regeneration Sites' and their housing		

th the Planning Policy Wales' need areas, promote viable s in accordance with the site t to site-specific assessment.

-allocation (Parc Afon Ewenni dered deliverable components bled forward' into the Deposit rability and viability credentials een a substantial change in DP period, as indicated within Strategy Options Background

bject to site-specific phasing epared initially through close d involvement with a range of Trajectory Background Paper, ne timing and phasing of sites iousing allocations) following to alter Parc Afon Ewenni and ated and not supported.

	quantum not attributed towards the overall		
	housing delivery of the plan.		
306	Material Considerations Firstly, and as above, it should be noted that the clients support the overall housing strategy proposed by BCBC and support the focus on the larger, strategic sites as it is evident that these will be crucial in the delivery of much-needed housing in the County Borough. The objection to Policy COM1 is solely related to the lack of inclusion of small-medium sites in conjunction with the larger sites, as these would actively complement and fully support the delivery of the strategic ambitions of BCBC. Maintaining a	Allocate additional small-medium allocations, notably Land adjoining Heol-Yr- Orsaf Kenfig Hill (Candidate Site Ref. 306.C1) and Land adjoining New Road, Kenfig Hill (Candidate Site Ref. 306.C2).	The Strategy seeks to deliver several large-scale Sustainable Urban Extensions, we sustainable communities that will incorporate a mix of complementary uses and deliver infrastructure and/or provide new supporting infrastructure. Indeed, this latter factor is the school capacity issues across the County Borough and the need for new stratt enough in scale to support provision of a new primary school as a minimum. Sustain have been proposed for allocation where they can best support the Replacement I and are capable of delivering mixed use development at a scale that will enhance conclusion of appropriate Sustainable Urban Extensions has been undertaken in Search Sequence and other requirements set out in Planning Policy Wales, as evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy O Housing Trajectory Background Paper and Minimising the Loss of BMV Agricultura The rationale for the proposed allocations within the Deposit Plan is clearly outli Assessment. Without exception, all proposed sites are supported by a large body evidence to demonstrate their deliverability.
	sustainable delivery of housing within the plan period As outlined by paragraph 4.2.10 of PPW11, 'the supply of land to meet the housing requirement proposed in a development plan must be deliverable.' The sites currently allocated for residential development in the Deposit Plan all consist of major residential opportunities. For example, even the site delivering the	The proposal to place a greater reliance on small to medium sized greenfield sites sites of this scale are far more likely to have an adverse impact on local commun infratructure problems and it is more difficult for such sites to provide their own sup they reach sufficient critical mass. As noted in the Plan-Wide Viability Appraisal, site can pose their own viability issues for this very reason. Therefore, the Deposit Pla allocations where capacity was clearly demonstrated to accommodate the respective settlement and/or necessary facilities and infrastructure improvements could be p development.	
would still deliver up to 102 m 15 affordable units within th This would represent a majo While, again, this appro supported in principle by the of inclusion of small-medium to be a missed opportunity	period, Land South East of Pont Rhyd-Ycyff would still deliver up to 102 market units and 15 affordable units within the plan period. This would represent a major development. While, again, this approach is fully supported in principle by the clients, the lack of inclusion of small-medium sites appears to be a missed opportunity for BCBC to		The Candidate Site Assessment clearly explains why Land adjoining Heol-Yr-Orsaf Ref. 306.C1) and Land adjoining New Road, Kenfig Hill (Candidate Site Ref. 306.C2) for allocation. Firstly, the site promoter for 306.C1 has failed to demonstrate that the submission of a viability assessment. Secondly, the majority of 306.C2 is locate boundary of Kenfig Hill which is identified as a Sustainable Growth Area (as defined this, a significant part of the site is heavily wooded and is designated as a SINC. No been provided to overcome this potential constraint. Furthermore, the required accommodated on less sensitive alternative sites and serve this area.
	actively deliver much-needed new housing from the very beginning of the plan period and support these sites as they come forward. In this way, the allocation of small- medium sites such as Land adjoining HeolYr-Orsaf Kenfig Hill (Candidate Site Ref. 306.C1) and Land adjoining New Road Kenfig Hill (Candidate Site Ref. 306.C2) would actively support the aspirations of BCBC - as the sites are in a position to deliver immediately. This would account for sites such as Land South of Bridgend (SP2 [3]) and Land East of Pyle ([943]) gradually coming forward and delivering housing beyond the plan period, as the clients are		For the avoidance of any doubt, the representor submitted some uncorroborated high Council, although no comprehensive viability assessment was provided for either sit Stage 2 Candidate Site promoters on 21 <sup>st</sup> August 2020 to remind site promoters of the an initial site viability assessment and providing evidence to demonstrate the financia Site promoters were also informed that any initial viability information they had gath this process. The same letter also explained that the South East Wales Region is c use the Burrows-Hutchinson Ltd Development Viability Model (DVM) for site promoter viability appraisals and that the Council endorses use of the DVM as an appropriate assessments in support of LDP Candidate Site submissions. Instructions were provimodel should site promoters wish to use this option to undertake a site-specific viability appraisals of Site-Specific Viability Appraisals was Monday 19 <sup>th</sup> October 2020 (up to detailed instructions, and the representor's claims to the contrary, no detailed viability

which is necessary to create iver improvements to existing or is particularly notable given rategic sites to be significant inable Urban Extension sites t LDP Vision and Objectives communities.

in accordance with the Site s documented in supporting y Options Background Paper, ral Land Background Paper. Itlined in the Candidate Site ody of technical and viability

tes is not supported. Several unities by exacerbating local supporting infrastructure until sites of several hundred units Plan has only proposed site tive level of growth within the e provided in support of the

af Kenfig Hill (Candidate Site C2) have not been proposed the site is viable through the cated outside the settlement red by SP1). Notwithstanding to supporting information has red level of growth can be

gh level viability inputs to the site. The Council wrote to all the importance of conducting sial deliverability of their sites. athered would assist them in a collectively in agreement to ters to undertake site-specific te tool for submitting viability ovided on how to access this iability assessment. A followe-iterate that the deadline for p to 11.59pm). Despite these lity appraisal (using the DVM

supportive of these allocations and think	or otherwise) was submitted to the Council to demonstrate that either site is viable
their sites can support their delivery by	to allocate both sites is therefore not supported.
contributing to housing supply delivery in	
the interim.	
The suitability, viability and deliverability of	
the proposed sites	
As outlined in the extensive submissions	
made by the clients during the Candidates	
Site Process (including Candidate Sites	
representations in 2018, representations to	
the Preferred Strategy in 2019, Stage 2	
Candidate Sites Representations in 2020,	
and the comprehensive suite of additional	
information submitted), the sites at Kenfig	
Hill proposed by the client are inherently	
suitable for residential development. With	
regards to land adjoining Heol Yr Orsaf, it is	
evident that the site is in a highly suitable	
location for residential development, and for	
inclusion as such within the allocations	
outlined in Policy COM1 (Housing	
Allocations). As outlined throughout the	
extensive documentation submitted, the site	
is located partially within and immediately	
adjacent to the settlement boundary of	
Kenfig Hill and, in this way, its allocation	
could be accommodated as part of a	
rounding off of the settlement boundary of	
Kenfig Hill. In addition to this, the site is	
located within close association and	
connection to Kenfig Hill High Street which	
provides a range of services and facilities -	
in this way, the allocation of this site would	
facilitate the sustainable growth of the	
settlement as per the aspirations of BCBC.	
With regards to land adjoining New Road	
Kenfig Hill, much like the site above, the site	
also lies partially within and immediately	
adjacent to the settlement boundary of	
Kenfig Hill and, similarly, the allocation of	
the site could also easily be accommodated	
as part of a rounding off of the settlement	
boundary of Kenfig Hill. It is evident that the	
development of this site would not unduly	
damage the character of the surrounding	
area, due to its strong association with the	
settlement of Kenfig Hill, Pyle and North	
Cornelly. In addition to this, the	
sustainability and accessibility credentials	

le or deliverable. The proposal

of the site lend themselves to supporting	
residential development at this location – a	
bus stop is, in fact, located 400m from the	
site and in close proximity to Pyle Train	
Station.	
In addition to this, transport surveys have	
been undertaken by Corun Associated Ltd	
for both sites. These demonstrate that there	
is no existing highway safety pattern or	
problem with the vicinity of the sites which	
could be exacerbated by the proposals, that	
the sites are highly accessible by	
sustainable modes of travel due to	
integration with the surrounding residential	
areas and that the appropriate access	
points can be achieved. Similarly, and	
crucially, viability appraisals, have been	
undertaken and submitted to BCBC for both	
sites. These demonstrate that when the key	
headline financial inputs are taken into	
account, the sites remain viable and, in turn,	
deliverable in commercial terms. Similarly,	
and crucially, viability work has been	
undertaken at both sites and submitted in	
support of their residential allocation. This	
demonstrates that when the key headline	
financial viability inputs are taken into	
account, the site remains viable and, in turn,	
deliverable in commercial terms.	
Additionally, the inherent deliverability of the	
sites is further confirmed by the ownership	
position of the sites. In fact, as outlined	
throughout the extensive representations	
submitted to BCBC, the sites are within the	
full ownership and control of the site	
promoters, Mr Leonard and Nathan Evans	
and their family. As such, the sites are ready	
to come forward for development within the	
early stages of the plan. The inherent	
deliverability of the sites has, in fact,	
recently piqued developer interest	
demonstrating that the sites represent an	
attractive opportunity to the development	
sector.	
In summary, Mr Nathan and Leonard Evans	
agree with BCBC's approach to allocating	
larger, strategic sites for residential	
development, as outlined by Policy COM1	



		 -
	(Housing Allocations), in principle, and actively support it. However, the clients object to the lack of small-medium residential opportunities included in Policy COM1 (Housing Allocations) to actively complement the proposed allocations as these can be valuable in delivering both market and affordable units, to support the delivery targets of BCBC, from the very beginning of the plan period. Similarly, owing to the unmet need and extant backlog of affordable housing, as identified within the LHMA (2021), maximising the development potential of small-medium sites in actively contributing to the delivery of affordable units would assist BCBC towards meeting their affordable housing need. In light of the above, Mr Nathan and Leonard Evans wish to, ultimately, emphasise that they are committed to the delivery of the two sites. This is emphasised by the market interest received, the lack of hesitation demonstrated when commissioning and submitting extensive technical information proving the inherent suitability of the sites and, in practical terms, the availability of two unconstrained sites which are in a position to actively deliver units from the very beginning of the plan	
222	<ul> <li>period.</li> <li>Policy PLA5: Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area</li> <li>Bellway provides comments on the proposal on Land East of Pyle in relation to the key proposals for Porthcawl, Pyle and North Cornelly.</li> <li>From the outset Bellway strongly objects to the inclusion of Land East of Pyle as an allocation under emerging Policy PLA5. As far as Bellway are aware the site is not being promoted by all landowners, there is no confirmation of a developer being engaged to take the site forward and there are fundamental technical matters and unknown infrastructure costs that render the proposal unviable and undeliverable. Bellway consider the inclusion of Land East</li> </ul>	As documented in the Candidate Site Assessment, the Land East of Pyle demonstrated delivery in accordance with the requirements set out in the Developm plethora of evidence has been provided to the Council to support its deliver investigations and appraisals, masterplans, a viability assessment, a trans consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary communities. Contrary to the representor's statement, all landowners are committed a development site that can be delivered as a comprehensive development. The reprepared initially through close dialogue with the respective site-promoters, follow and involvement with a range of stakeholders at a Stakeholder Group Meeting Housing Trajectory Background Paper, there were no outstanding matters of disa figures or the timing and phasing of sites in the plan period (including those sites w new housing allocations) following conclusion of the Stakeholder Group Meeting. At to Land East of Pencoed trajectory is both unsubstantiated and not supported.

le site promoter has robustly pment Plans Manual. A detailed very, including numerous site ansport assessment and due has provided a high degree of ora of associated development ry to deliver high-quality new ted to working towards ensuring e related housing trajectory was owed by effective collaboration ng. As documented within the isagreement on the completion is with planning permission and . As such, the proposed change

ot yet been defined through this forthcoming SDP and is bound the Review Report before work uncil undertakes a full review of

<ul> <li>of Pyle under Policy PLA5 not to be found upon robust and credible evidence and therefore the RLDP is considered unsound as it fails the Council's own Test of Soundness in respect of Test 3. Specifically, the proposed allocation will not deliver. It is not realistic or appropriate and is not founded on a robust and credible evidence base. Fundamentally, it renders the RLDP unsound. As a result. Bellway strongly recommends Land East of Pyle should be deallocated to enable viable and deliverable alternatives, such as land at Heol Fach, to be allocated in the final version of the RLDP. In this context, our representation to the DCD are set out below.</li> <li>As outlined at the start of this representation, Bellway strongly objects to the inclusion of Land East of Pyle being included as an allocation and recommend that for the RLDP to be sound it should be deallocated, Bellway consider the allocation of 2,000 dwellings to be a strategic matter</li> </ul>		the existing LDP on an individual Local Planning Authority (LPA) area basis, v collaboratively with other LPAs to produce a joint evidence base and with the regio the Council remains committed to the SDP process, the site promoter has clearly de of Pyle is both viable and deliverable during the Replacement LDP period, in accor Spatial Strategy. In terms of cross boundary implications, Bridgend County Boroug dialogue with Neath Port Talbot County Borough Council through plan preparation. Borough Council has submitted formal representations on the Bridgend Deposit Pla this proposed allocation and support the Deposit Plan. In addition, the number of dwellings Land East of Pyle is expected to deliver durin similar in scale to the other proposed Strategic Sites. Therefore, it is not considered ap on site progression until a future SDP is adopted and de-allocate the site.
 that should be considered as part of SDP.221Persimmon Homes West Wales object to the over-reliance on the Porthcawl Regeneration Growth Area for the delivery of homes in Porthcawl. Lack of delivery of the regeneration site (Porthcawl Waterfront) as per the trajectory over the Plan Period could result in failure to deliver the housing numbers and growth objectives required for Porthcawl as a Main Settlement. Likewise, the approach to the exclusion of Land at Broadlands (ref: 221.C1) in West Bridgend (PLA 3) and over-reliance on 'roll-over' site Parc Afon Ewenni in south / east Bridgend is equally fundamentally questioned and therefore objection is raised with regard to the	Object to the 'over-reliance' on rollover sites Porthcawl Waterfront and Parc Afon Ewenni	<ul> <li>Two existing large scale brownfield regeneration sites were initially proposed for re-a and Porthcawl Waterfront) within the Replacement LDP, both of which are consider of housing supply to enable delivery of the housing requirement. Before being 'rolle Plan, both sites were subject to robust re-assessment of their sustainability, deliverab in the same manner as all other candidate sites. In the case of Porthcawl Waterfront, t change in circumstances to demonstrate the sites can be delivered over the Re indicated within the housing trajectory (refer to the Housing Trajectory Backgroun Options Background Paper and Candidate Site Assessment).</li> <li>For Parc Afon Ewenni, the Council has now removed the site from the housing traje subsequent uncertainty relating to delivery timescales. The Candidate Site Assessmu updated to reflect this constraint, of which states that 'the site is located within the Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The allocation from the existing LDP (REG1(6)) and is proposed to be developed for uses. However, the Council's Strategic Flood Consequences Assessment identifies vulnerable to flood risk. As such, the site will not therefore be allocated for developed</li> </ul>
Sustainable Growth Area for Bridgend. See attached overarching representations (dated 27th July 2021) and candidate site specific representations (Broadlands (ref: 221.C1), Coychurch (ref: 221.C3) and Zig Zag Lane, Porthcawl (ref: 221.C2) (dated		LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewenni due to th timescales as a result of flood risk For Porthcawl Waterfront, the Council has now purchased and has total control over F defence works are progressing on site and are due to be completed by the end of 20 currently being explored in order to bring forward development, initial work has

, wherever possible working gion to prepare a SDP. Whilst demonstrated that Land East cordance with the Growth and ough Council has remained in on. Neath Port Talbot County Plan and cite no objections to

ring the Replacement LDP is appropriate to delay progress

e-allocation (Parc Afon Ewenni dered deliverable components olled forward' into the Deposit rability and viability credentials t, there has been a substantial Replacement LDP period, as ound Paper, Spatial Strategy

rajectory due to flood risk and sment (2022) report has been in the settlement boundary of the site represents a 'Rollover' or commercial and residential es that the site is significantly elopment in the Replacement the uncertainty over delivery

er Phase 1 (Salt Lake), coastal 2022. Partnership options are as commenced in relation to

	27th July 2021) submitted on behalf of Persimmon Homes West Wales regarding the approach to housing growth and trajectories and the need to allocate additional housing sites deliverable in the early plan years. For the reasons mentioned above and in the supporting representation letters, we consider the Deposit Plan to be 'unsound' as currently drafted, on the basis of Test 2 (the regeneration growth strategy only for Porthcawl, the exclusion of Broadlands from West Bridgend growth strategy is not logical, nor is the over-reliance on 'roll- over' site Parc Afon Ewenni in south / east Bridgend) and Test 3 (that the Deposit Plan is unlikely to deliver in the relevant timescales and allow for appropriate contingency provisions).		procurement mechanisms and a formal procurement exercise is scheduled to co (Sandy Bay / Coney Beach) is being jointly promoted by the Council and a priva majority of the site is not reliant on coastal defence works to come forward. A land-ow a disposal strategy is being finalised and the site is likely to be brought to the marked Phase 2 now running in parallel, there is now no reason why both phases will be ur forward together, as further evidenced by the extensive supporting deliverabili representor's objection to Porthcawl Waterfront is considered unsubstantiated and is The total housing provision, and spatial distribution thereof, has also been subju- analysis to enable development of the housing trajectory. The trajectory was prep- dialogue with the respective site-promoters, followed by effective collaboration and stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trr there were no outstanding matters of disagreement on the completion figures or the in the plan period (including those sites with planning permission and new hou conclusion of the Stakeholder Group Meeting. In summary therefore, the repress Porthcawl Waterfront are not supported. Informed by the Sustainability Appraisal Report, the Candidate Site Assessment p Deposit Plan confirms and provides reasoned justification for the outcome of the site of each candidate site. In relation to Broadlands (Candidate Site Ref: 221.C1) sy states, "The candidate site is located on the periphery of Bridgend which is identified as a S defined by SP1). There are education capacity issues in the area whereby a site exacerbate without the ability of resolving them. Whilst the sustainability and place m are acknowledged, there are other more suitable sites that have been carried fo Deposit Plan without the presence of such issues. Therefore, this site will not be allow Whilst the Council notes the representor's objection to this conclusion, the propo-
221	Roll-over Site Allocations To confirm, 1,790 homes in the Deposit Plan have been allocated on sites "rolled-over" from the existing adopted Bridgend Local Development Plan (2006-2021). This accounts for 27% of the 6,739 homes listed within the housing trajectory and includes the Porthcawl Waterfront Regeneration Site (1,115 units) (SP2(2) / PLA1) and Parc Afon Ewenni in Bridgend (675 units)) (COM1(1)). As previously set out in detail within the Preferred Strategy representations submitted on behalf of Persimmon Homes West Wales during late 2019, the reliance on the waterfront strategic allocation in Porthcawl as the only planned source of housing numbers is deemed to be deeply flawed and raises significant concerns regarding the ability of Porthcawl to support its status as a Main	Bridgend (221.C3).	<ul> <li>reasons outlined.</li> <li>Two existing large scale brownfield regeneration sites were initially proposed for re-a and Porthcawl Waterfront) within the Replacement LDP, both of which were conside of housing supply to enable delivery of the housing requirement. Before being 'rolke Plan, both sites were subject to robust re-assessment of their sustainability, deliverate in the same manner as all other candidate sites. In the case of Porthcawl Waterfront, i change in circumstances to demonstrate the sites can be delivered over the Refindicated within the housing trajectory (refer to the Housing Trajectory Backgrout Options Background Paper and Candidate Site Assessment).</li> <li>For Parc Afon Ewenni, the Council has now removed the site from the housing traj subsequent uncertainty relating to delivery timescales. The Candidate Site Assessmupdated to reflect this constraint, of which states that 'the site is located within the Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The allocation from the existing LDP (REG1(6)) and is proposed to be developed for uses. However, the Council's Strategic Flood Consequences Assessment identifies vulnerable to flood risk. As such, the site will not therefore be allocated for develot LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewenni due to the timescales as a result of flood risk.</li> </ul>

commence shortly. Phase 2 ivate owner and a significant owners agreement is in place, ket shortly. With Phase 1 and unable to progress and come bility evidence. As such, the d is not supported.

bject to site-specific phasing repared initially through close id involvement with a range of Trajectory Background Paper, he timing and phasing of sites nousing allocations) following esentor's concerns regarding

e published to accompany the te selection process in respect specifically, the Assessment

Sustainable Growth Area (as site of this size would further making credentials of the site forward as allocations in the allocated in the Deposit Plan".

osal is not supported for the

e-allocation (Parc Afon Ewenni dered deliverable components olled forward' into the Deposit rability and viability credentials it, there has been a substantial Replacement LDP period, as ound Paper, Spatial Strategy

rajectory due to flood risk and sment (2022) report has been n the settlement boundary of he site represents a 'Rollover' or commercial and residential es that the site is significantly elopment in the Replacement the uncertainty over delivery

er Phase 1 (Salt Lake), coastal 2022. Partnership options are

Settlement within the settlement hierarchy. Whilst the delivery of homes at Porthcawl Waterfront site at some stage in time is not disputed, the lack of any buffer / fall-back options to allow for alternative housing growth in Porthcawl if the site does not come forward as per the trajectory (i.e. from 2024/25) renders the Plan 'unsound' (also see representations submitted with regard to the proposed Zig Zag Lane, Porthcawl candidate site (221.C2). Although the Council might consider the proposed higher flexibility rate of 20% may form a partial remedy for this issue, it is not deemed to form a positive approach to Plan preparation to rely on this as a contingency for the Porthcawl situation and the County Borough should be allocating sites which are realistically considered to deliver homes in the specified timeframes set out in the trajectory. The initial delivery year of 2024/25 is considered to be extremely over optimistic. Similarly, the Parc Afon Ewenni deliverability for residential development as currently proposed in the Deposit Plan is likewise questioned, particularly with regard to the necessary land assembly due to the multiple ownership interests, extensive remediation of the site necessary and the potential issues regarding flooding due to the proximity of the Ewenny River. Further detail on the complexities relating to the delivery of this site is provided within the representations submitted with regard to the proposed land south of Coychurch candidate site allocation, due to comparison of the two sites in regard to the candidate sites process. As previously mentioned with regard to both Porthcawl Waterfront and Parc Afon Ewenni sites, if there were indeed no barriers to delivery, the planning applications to bring forward new homes on these sites would have realistically been made by now. Persimmon Homes West Wales object to the reliance on stalled sites, notwithstanding that robust deliverability / viability information is suggested to have currently being explored in order to bring forward development, initial work has commenced in relation to procurement mechanisms and a formal procurement exercise is scheduled to commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted by the Council and a private owner and a significant majority of the site is not reliant on coastal defence works to come forward. A land-owners agreement is in place, a disposal strategy is being finalised and the site is likely to be brought to the market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no reason why both phases will be unable to progress and come forward together, as further evidenced by the extensive supporting deliverability evidence. As such, the representor's objection to Porthcawl Waterfront is considered unsubstantiated and is not supported.

In response to the representor's request, whilst site-specific deliverability evidence has not been published as part of the evidence base to the Deposit Plan, such information will be published in an appropriate format when the plan is submitted for examination.

The total housing provision, and spatial distribution thereof, has also been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting. In summary therefore, the representor's concerns regarding Parc Afon Ewenni and Porthcawl Waterfront are not supported.

Informed by the Sustainability Appraisal Report, the Candidate Site Assessment published to accompany the Deposit Plan confirms and provides reasoned justification for the outcome of the site selection process in respect of each candidate site.

In relation to Zig Zag Lane (Candidate Site Ref: 221.C2) specifically, the Assessment states,

The Candidate Site is located outside the settlement of Porthcawl which is identified as a Regeneration Growth Area (as defined by SP1). Brownfield sites will primarily provide the required capacity to accommodate growth within Regeneration Growth Areas. The site represents a large scale Greenfield extension to the existing settlement of Porthcawl that would undermine the Preferred Strategy. Therefore it is considered to represent an unacceptable incursion into the open countryside, as such this site will not be assessed as part of Stage 2.

In relation to Land South of Coychurch (Candidate Site Ref: 221.C3) specifically, the Assessment states,

"The candidate site is located on the periphery of Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The proposed development would look to provide 500 homes which would have a significant impact on local education provision without providing a new education facility on site. Additionally, when compared to the other sites in Bridgend that are carried forward as allocations in the Plan, the site is less sustainable in that it is located further from the town centre with poor pedestrian connectivity. Development of this site would result in an increase in the dependency on the private car and therefore not encourage a modal shift to more sustainable forms of active travel. The development would also result in the loss of good quality agricultural land. Therefore, this site is not specifically allocated in the Deposit Plan".

Whilst the Council notes the representor's proposals to include these two sites within the Replacement LDP, these proposals are note supported for the reasons outlined above.

been provided. The Development Plans Manual (Edition 3) (March 2020) clearly states: "Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered" (p120) (Tetra Tech emphasis). The Strategic Planning Policy team indicate the following with regard to the roll-over sites; "... information on deliverability, viability, landowner agreements and master planning was required from the outset" (para 4.3) and "amount of work completed by Corporate Landlord to demonstrate deliverability is phenomenal within the time frame and the sites only feature on the shortlist on that basis" (para 4.6)7. It is considered that the given such evidence base documents are fundamental to the Council's decision making and justification to allocate these sites ahead of others, this evidence should be published for transparency and openness in the Plan making process to demonstrate compliance with the tests of soundness.

Soundness: The Deposit Plan as currently drafted fails Test 1, 2 and 3 in terms of being effective and deliverable within relevant timescales and based on a robust and credible evidence base.

Recommendation: The following recommendations are:

- Publication of the evidence base demonstrating the deliverability of the "rollover" sites to allow public scrutiny regarding the robustness of the planned trajectory / delivery timescales; and

- Allocation of fallback sites to accommodate the potential non-delivery of the Porthcawl Waterfront and Parc Afon Ewenni within the projected trajectory timeframes. Evidently, land at Zig Zag Lane in Porthcawl and Land south of



	Coychurch would both provide suitable additional sites to accommodate any shortfalls of the two roll-over sites.		
	The decision to not include the three brownfield regeneration allocations; Maesteg Washery, Coegnant Reclamation Site (Caerau), and Former Cooper Standard Site, Ewenny Road (Maesteg)) within the overall housing requirement numbers, however to allocate as 'Long- term Regeneration Sites,' is deemed to be a positive and the correct approach. It is welcomed that the complexities of delivering these sites for residential development in the short to medium term due to remediation complexities and lead- in times have been acknowledged.	Former Cooper Standard Site, Ewenny Road,	Comments noted.
38	No -But Coastal support this and with their regeneration 'ethos' welcome assisting the Council in any way to achieve their regeneration initiatives	None	Comments noted.
394	support	None	Comments noted.
219	SP3: Good Design and Sustainable Place Making This policy is the strategic design policy for the Deposit LDP. It is notable that, with regards to certain design consideration, much of Policy SP3 states that applicants "must", which differs in tone to PPW which, in many cases, used the terminology "should". It is therefore suggested that the tone of Policy SP3 responds to the approach taken in PPW.		Comments noted, however, the Planning Inspectorate has advised that 'must' is Strategic and Development Management Policies. Therefore, the proposed changes and not supported. The Policy is considered appropriate in its current form and certainty for all stakeholders during the Replacement LDP period.
407	SP2: Regeneration Growth Area and Sustainable Growth Area Strategic Allocations This policy builds on Policy SP1 (Regeneration and Sustainable Growth Strategy) by identifying Strategic Allocations for the four Regeneration Growth Areas and three Sustainable Growth Areas. HD Ltd support the identification of "Land South of Bridgend (Island Farm)" as a Strategic Allocation within the Bridgend Sustainable Growth Area. HD Ltd have specific comments on the wording supporting the strategic policy itself and these are provided elsewhere within this response. Support: Policy SP2 is supported.	No proposed changes. Supports allocation of Land South of Bridgend as a means of delivering the growth strategy.	Comments of support acknowledged.

' is appropriate terminology for ages to SP3 are unsubstantiated and is designed to ensure more

ID	Comment	Summary of changes being	Council response
82	Policy COM2 (affordable housing) – the figure (1,977) should be described as a target and not a set figure. It is also questionable whether this policy is required as Policies COM3, 4, 5 all cover the same points.	sought/proposed Proposal for COM2 to describe the affordable housing figure as a 'target' and merge with Policies COM 3, 4 and 5.	Policy COM2 is the Development Management policy to support delivery of the St contribution the Replacement LDP can make to affordable housing provision has through plan-wide and site-specific viability appraisals (refer to Plan-Wide Via Affordable Housing Background Paper). SP6 has been formulated in accordance paragraph 5.59 in the Development Plans Manual (Edition 3) and COM2 supports policy. The affordable housing provision is clearly identified as a target within suppor Deposit Plan. No further revisions are therefore considered necessary on this basis Whilst related, Policies COM 3, COM 4 and COM 5 provide criteria based policies for provision, off-site affordable housing provision and affordable housing exception detailed policy coverage on these distinct forms of affordable housing provision a addition to COM2 and all of which support delivery of Strategic Policy 6 (SP6). As s the related policies is not supported.
	Policy COM3 (on-site provision of AH) – BDW would like to query why affordable housing requirements are set at higher levels on the strategic sites than in the housing market area generally (Bridgend, Pyle, Maesteg).	Query why different area- specific and site- specific affordable housing policies are included in COM3.	The rationale for the area-based and site-specific policies is clearly set out wit Background Paper. Within any broad housing market area, there will inevitably be viability, the nuances of which can never be fully captured in an area-wide str Development Plans Manual, "much more insight can be gained which can result in targets, as opposed to the broader area identified in the high level appraisal. The rather the site specific being a refinement of the high level appraisal" (WG, 2020, pa to the area-wide affordable housing requirements within COM3, there are also site requirements. The former are based on the Plan-Wide Viability Assessment, the latt viability testing, which has involved analysis of more specific costs, constraints and s faceted approach is paramount to ensure Council's aspirations for delivering high-of both realistic and deliverable. This evidence has indicated that higher levels of supported on certain sites as detailed within COM3.
	Policy COM6 (residential density) – BDW would like clarification of what constitutes 'an efficient and appropriate density' as set out in the proposed wording of this policy.	Query on what constitutes 'an efficient and appropriate density'.	The Replacement LDP seeks to maximise its contribution to well-being through Su Good Design, in accordance with Planning Policy Wales. COM6 seeks to achieve to mixed, socially inclusive, sustainable communities through a range of house types a of residents at an efficient and appropriate density. Rather than specifying a nume the framework to make the most efficient use of land based on site-specific co appropriate balance of uses can be pursued in a manner that maximises the dens compromising the quality of the living conditions provided.
	Policy SP10 (Infrastructure) – BDW would like to query how economic infrastructure (telecommunications / broadband infrastructure) and renewable energy and low carbon technologies could reasonably be secured as S106 requirements. They	Query on how economic infrastructure and renewable energy can be secured as s106 requirements.	Telecommunications and low carbon technology related infrastructure is and will be over the Replacement LDP period with the lasting impacts of the pandemic and Planning Policy Wales considers these forms of supporting infrastructure "crucia environmental sustainability" and stresses that "Infrastructure which is poorly des exacerbate problems rather than solving them" (para 3.61). SP10 therefore sets our all development proposals to be supported by sufficient existing or new infrastructure can be effectively co-ordinated to support the Plan. In order to mitigate likely adverse

Strategic Policy 6 (SP6). The has been robustly assessed (iability Assessment and the e the wording detailed within ts delivery of this key housing porting paragraph 5.3.22 of the sis.

for on-site affordable housing tion sites, respectively. More are considered necessary in s such, the proposal to merge

within the Affordable Housing be pockets of higher or lower study. As outlined within the in refined affordable housing the two are not contradictory, para 5.89). Hence, in addition te-specific affordable housing atter are based on site-specific d site requirements. This dualquality new communities are of affordable housing can be

Sustainable Placemaking and e these principles by enabling s and sizes to meet the needs heric requirement, COM6 sets context, thereby ensuring an nsity of developments without

become increasingly important and additional home working. cial for economic, social and esigned or badly located can but the holistic requirement for cture, ensuring such provision rse impacts and/or to integrate

	are covered by other policies or legislation such as building regulations.		a development proposal with its surroundings, reasonable infrastructure provision of such infrastructure must be provided by developers where necessary. The policy wor secured by means of planning agreements/obligations where appropriate" and any subject to Community Infrastructure Levy Regulations and the Tests of Neces representor's comments are noted, the proposed policy wording of SP10 is considered form.
488	Want evidence that the foundational economy has delivered in this area.	Want evidence that the foundational economy has delivered in this area	Comments noted. The Deposit Plan has been underpinned by the identification of the 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 ide requirement to enable a balanced level of housing and employment provision the patterns of growth, support existing settlements and maximise viable affordable house
			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 existin Maesteg and the Llynfi Valley are still denoted as regeneration priorities through 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. However success in delivering development on brownfield land in other settlements (notably Gateway), there are limited further 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 alreaservices, facilities and employment opportunities and are most conducive to a development. As such, a Settlement Assessment has been undertaken (See Ap sustainable settlement hierarchy. Based upon the consideration of a comprehe sustainable growth will be appropriately directed towards the Main Settlements of Br with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
			The plan preparation has involved the assessment of 171 sites. Each candidate site I the criteria in the Candidate Site Assessment Methodology which was previously con 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessmeated 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.
			Development of this scale (Sustainable Urban Extensions) is necessary to create su will incorporate a mix of complementary uses and deliver improvements to existing in new supporting infrastructure. The latter factor is particularly notable given the school County Borough and the need for new strategic sites to be significant enough in sca new primary school as a minimum.

n or financial contributions to ording states that "this will be any such agreements will be essity. Therefore, whilst the ered appropriate in its current

the most appropriate scale of ell informed, evidence based ackground Paper 2: Preferred ble Replacement LDP period d Paper. This has considered 2033 and informed the most identifies an appropriate plan that will achieve sustainable busing delivery.

y Options Background Paper nent of land within or on the ld sites. It continues to focus ting LDP, hence, Porthcawl, nrough their designation as ent opportunities within these Vales and seeks to minimise ever, given the existing LDP's oly Bridgend and the Valleys aining. Additional viable and ment SP1, deliver affordable irements can be realised.

ready benefit from significant enabling transit orientated Appendix 19) to establish a ehensive 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

sustainable communities that infrastructure and/or provide ool capacity issues across the cale to support provision of a

		[	
			Policies PLA1-PLA5 (See Deposit Plan – Page 62) detail the site-specific requi Strategic Development Sites in Regeneration Growth Areas and Sustainable Growth include masterplan development principles and development requirements all of w address the identified key issues and drivers identified through the Replacement LD will be facilitated through the provision of affordable housing, on-site education provi active travel provision.
516	We don't need more housing. The population is shrinking (ageing population). Have you asked people if they want a government that continually tries to grow the population? As for creating "mixed and balanced communities"? - what does that even mean? Nobody asked for this. We live here. BCBC is our servant, not our master. Start acting like it.	Don't need more housing	Comments noted. The Deposit Plan has been underpinned by the identification of the economic growth and housing provision, all of which have been based upon well judgements regarding need, demand and supply factors (See Appendix 42 – Bac 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 2018-2 appropriate response for the Replacement LDP. As such the Replacement LDP id requirement to enable a balanced level of housing and employment provision the patterns of growth, support existing settlements and maximise viable affordable house.
			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 existing Maesteg and the Llynfi Valley are still denoted as regeneration priorities that Regeneration Growth Areas. The ongoing commitment to brownfield development settlements accords with the site-search sequence outlined in Planning Policy Ward developmental pressure on Best and Most Versatile (BMV) agricultural land. However, success in delivering development on brownfield regeneration opportunities remaind deliverable sites (including some greenfield sites) are therefore required to implement housing in high need areas and ensure the County Borough's future housing required.
707	There is a constant theme within these pages that more housing attracts jobs to an area. I've not seen that happen. A 'mix of complimentary uses', a 'Broad notion', 'Investment in infrastructure, facilities and	Concerns regarding employment	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 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).
	additional benefits' there's lots of description but there's 'no meat on the bones' More housing will act as a key driver of economic growth - surely, it should be MORE JOBS will be the driver for economic growth. There's plenty of evidence showing new housing coming to the area but never of JOBS coming to area - and I mean family sustaining level of jobs - not burger flipping		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 be need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferre Options). A range of growth scenarios across the whole Replacement LDP perio discussed within the Strategic Growth Options Background Paper. This has co Borough's demographic situation is likely to change from 2018-2033 and infor response for the Replacement LDP. As such the Replacement LDP identifies an ap to enable a balanced level of housing and employment provision that will achieve sus
	min. wage jobs. All of this page is virtually stating what one HOPES will be obvious with no substance on how it's actually going to be implemented.		Over 30% of the County Borough's population is projected to be aged 60+ by 2033 growth across this age group, there is likely to be a broad reduction in local econo does not facilitate sustainable levels of economic growth to offset this phenomen therefore seeks to deliver sustainable forms of growth that will attract and retain econ within the County Borough. As justified within the Strategic Growth Options Backgroup and Sustainable Growth Strategy is largely driven by households within the 35-44

uirements for the mixed-use wth Areas. Such requirements which seek to contribute and .DP preparation process. This vision, public open space and

the most appropriate scale of ell informed, evidence based ackground Paper 2: Preferred ole Replacement LDP period nd 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, hrough their designation as ent opportunities within these Vales and seeks to minimise ever, given the existing LDP's ably Bridgend and the Valleys aining. Additional viable and ement SP1, deliver affordable irements can be realised.

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 formed the most appropriate appropriate plan requirement sustainable patterns of growth.

33. With absolute and relative nomic activity rates if the Plan enon. The Replacement LDP conomically active households ound Paper, the Regeneration 44 age group. This growth is

			projected to support an increase in people in workplace based employment ov accommodated through provision of up to 7,500 additional jobs.
			A positive employment land response is necessary to achieve an equilibrium betwee skilled labour force and job opportunities in order to stimulate the local to regional econ Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix labour force boost alongside other employment trends including past take up of en based economic forecasts. The resulting evidence base has informed the scale and need and the land best suited to meet that need over the plan period in the contex and Technical Advice Note 23, justified further in the Employment Background Pape
			Whilst it is beyond the scope of the LDP to guarantee that employers will come to the SP11 by allocating new employment land for development. Policy ENT2 supports employment function of existing business and employment sites. This will enable a come forward.
779	See my previous comments	No changes proposed	Comments noted.
847	No	No changes proposed	Comments noted.
996	Taking more natural space for building development will do nothing to promote an active, healthy community. Enhance the natural spaces to encourage people to explore.	Taking more natural space for building development will do nothing to promote an active, healthy community. Enhance the natural spaces to encourage people to explore	Comments noted. As part of the technical supporting evidence base accompanying the has undertaken an updated detailed audit of existing outdoor sports and children's plasting borough (See Appendix 22: Outdoor Sport and Children's Play Space Audit (2021)). means of justifying the provision of new facilities and/or remedying local deficiencies used as means of safeguarding and enhancing existing facilities as appropriate. Additionally, the Council has undertaken a Green Infrastructure Assessment (See shape the planning and delivery of green infrastructure throughout the County summaries the findings of the detailed 'audit' of the provision of Outdoor Sports an within the County Borough of which is endorsed by Fields in Trust (FIT), whilst also a to include green infrastructure assets (such as allotments, cemeteries, woodland Integrated Network Maps. As such the assessment will provide a mechanism to a forms an integral and significant part of development and wider infrastructure proposed Development proposals including strategic site allocations will be expected to mai Bridgend's green infrastructure network and ensuring that individual green assets are and integrated into any new development. In terms of Strategic Development Sites, Policies PLA1-PLA5 detail the site spece masterplan development principles and development requirements. Such requirements and provide suitable buffers to habitats, particularly hedgerows, trees (inclu Ancient Woodland), and SINCs. Additionally, green infrastructure and outdoor recreation be delivered in accordance with Policy COM10 and Outdoor Recreation Face.
329	only that small scale sites in areas that can accommodate small scale growth and meet the criteria for new houses should be allowed and that are close to the settlement boundary	Only small scale sites should be permitted	Development Supplementary Planning Guidance. 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 ide

over the Plan period, to be

tween new homes, a growing economy. The 2019 Economic ix 15) analysed this projected employment land and sector nd distribution of employment text of Planning Policy Wales oper, and set out in SP11.

ne area, Policy ENT1 supports rts SP11 by safeguarding the e a range of different sites to

y the Deposit Plan, the Council playspace across the County )). Its findings can be used as ies in provision. It can also be

e Appendix 23) to guide and by Borough. The assessment and Children's Playing Space o adopting a holistic approach ands, broad habitats) and the o ensure green infrastructure bosals.

naintain, protect and enhance are retained wherever possible

becific requirements including rements will ensure that sites cluding Ancient and/or Semieation facilities will be required Facilities and New Housing

the most appropriate scale of ell informed, evidence based ackground Paper 2: Preferred ole Replacement LDP period nd Paper. This has considered -2033 and informed the most identifies an appropriate plan

requirement to enable a balanced level of housing and employment provision that
patterns of growth, support existing settlements and maximise viable affordable hous
The distribution of growth is further evaluated and justified in the Spatial Strategy ( (See Appendix 43 – Background Paper 3). The strategy prioritises the developme 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 thro 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. However success in delivering development on brownfield land in other settlements (notably Gateway), there are limited further brownfield regeneration opportunities remain deliverable sites (including some greenfield sites) are therefore required to implement housing in high need areas and ensure the County Borough's future housing require
The Replacement LDP apportions sustainable growth towards settlements that alreat services, facilities and employment opportunities and are most conducive to a development. As such, a Settlement Assessment has been undertaken (See Ap sustainable settlement hierarchy. Based upon the consideration of a comprehe sustainable growth will be appropriately directed towards the Main Settlements of Br with 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 assesses 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.
In terms of allocated Strategic Development Sites, Policies PLA1-PLA5 detail the including masterplan development principles and development requirements all of w address the identified key issues and drivers identified through the Replacement LDF will be facilitated through the provision of affordable housing, on-site education provis active travel provision. Development of this scale is necessary to create sustain incorporate a mix of complementary uses and deliver improvements to existing infrast supporting infrastructure. The latter factor is particularly notable given the school County Borough and the need for new strategic sites to be significant enough in scan new primary school as a minimum. Smaller edge of settlement sites have also been (See Policy COM1), and have only been allocated where capacity was clearly dem the respective level of growth within the settlement and/or necessary facilities and ir were provided in support of the development. This was considered paramount to available to accommunities by otherwise exacerbating localised problems.
In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been 37). The IDP provides a single schedule of all necessary infrastructure without allocated sites for the anticipated quantum of proposed housing/employment uses w

that will achieve sustainable using delivery.

Poptions Background Paper nent of land within or on the d sites. It continues to focus ing LDP, hence, Porthcawl, rough their designation as nt opportunities within these /ales and seeks to minimise ver, given the existing LDP's oly Bridgend and the Valleys ining. Additional viable and ment SP1, deliver affordable rements can be realised.

ready benefit from significant enabling transit orientated Appendix 19) to establish a shensive 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 t, only those sites deemed

he site specific requirements which seek to contribute and DP preparation process. This vision, public open space and inable communities that will astructure and/or provide new of capacity issues across the cale to support provision of a en considered and allocated monstrated to accommodate infrastructure improvements woid impacting negatively on

en produced (See Appendix t which the development of within the plan period could

			not proceed. Such infrastructure includes transport, education, health, environmen addition to community and cultural infrastructure.
846	Yes SP9 should have an addition para(10) Outdoor Recreation Facilities , including facilities not currently used as the owners are keeping them unused Within 5.3.67 the definition of Playing Pitches should be extended to read " pavilions, clubhouses and(where appropriate for the level of sport played) stands , spectator areas , lighting , training	Comments relating to outdoor recreation facilities provision.	For the purposes of preparing the Replacement Local Development Plan the te facilities' covers a broad range of activities and services, some of which are in the ow others that are privately owned, in line with policy contained within Fields and Tr
	facilities etc "		As part of the technical supporting evidence base accompanying the Deposit Plan, the an updated detailed audit of existing outdoor sports and children's playspace across Appendix 22: Outdoor Sport and Children's Play Space Audit (2021)). Its findings justifying the provision of new facilities and/or remedying local deficiencies in provision means of safeguarding and enhancing existing facilities as appropriate. The docume whether each identified facility is accessible for public use or privately owned.
			Additionally, the Council has undertaken a Green Infrastructure Assessment (See shape the planning and delivery of green infrastructure throughout the County E summaries the findings of the detailed 'audit' of the provision of Outdoor Sports and within the County Borough of which is endorsed by Fields in Trust (FIT), whilst also a to include green infrastructure assets (such as allotments, cemeteries, woodland Integrated Network Maps. As such the assessment will provide a mechanism to e forms an integral and significant part of development and wider infrastructure proposed.
			Development proposals including strategic site allocations will be expected to main Bridgend's green infrastructure network and ensuring that individual green assets are and integrated into any new development.
			In terms of Strategic Development Sites, Policies PLA1-PLA5 detail the site spect masterplan development principles and development requirements. Such requirement retain and provide suitable buffers to habitats, particularly hedgerows, trees (inclu Ancient Woodland), and SINCs. Additionally, green infrastructure and outdoor recreat to be delivered in accordance with Policy COM10 and Outdoor Recreation Fa Development Supplementary Planning Guidance.
108 5	Based on the above objective, the proposed development between Laleston and bryntirion will only result in further land being built on. There are plenty of shops in the area together with schools. There is no need for this development and on the basis of the above.	Concerns relating to over- development within the area.	The Deposit Plan has been underpinned through the identification of the most app growth and housing provision, all of which have been based upon well informed, e regarding need, demand and supply factors (See Appendix 42 – Background P Strategic Growth Options). A range of growth scenarios across the whole Replacem analysed and discussed within the Strategic Growth Options Background Paper. Th County Borough's demographic situation is likely to change from 2018-2033 and info response for the Replacement LDP. As such the Replacement LDP identifies an ap 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 (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 existing of the strategy of the strategy of the strategy priorities areas.

ental management, utilities in

term 'social and community ownership of the Council, and Trust Wales. All facilities are asis, no changes to SP9 are

the supporting paragraph will

n, the Council has undertaken oss the County Borough (See gs can be used as means of vision. It can also be used as ment provides reference as to

e Appendix 23) to guide and by Borough. The assessment and Children's Playing Space o adopting a holistic approach nds, broad habitats) and the o ensure green infrastructure posals.

aintain, protect and enhance are retained wherever possible

becific requirements including rements will ensure that sites cluding Ancient and/or Semieation facilities will be required Facilities and New Housing

ppropriate scale of economic , evidence based judgements Paper 2: Preferred Strategy ement LDP period have been This has considered how the nformed the most appropriate appropriate plan requirement sustainable patterns of growth,

y Options Background Paper ment of land within or on the eld sites. It continues to focus sting LDP, hence, Porthcawl,

			Maesteg and the Llynfi Valley are still denoted as regeneration priorities through the Regeneration Growth Areas. The ongoing commitment to brownfield development settlements accords with the site-search sequence outlined in Planning Policy Wardevelopmental pressure on Best and Most Versatile (BMV) agricultural land. However, success in delivering development on brownfield land in other settlements (notable Gateway), there are limited further brownfield regeneration opportunities remained deliverable sites (including some greenfield sites) are therefore required to implement housing in high need areas and ensure the County Borough's future housing requires The Replacement LDP apportions sustainable growth towards settlements that alres services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See Ag sustainable growth will be appropriately directed towards the Main Settlements of Brown with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
			The plan preparation has involved the assessment of 171 sites, the vast majority of candidate site has been assessed against the criteria in the Candidate Site Assessment previously consulted upon (See Appendix 13 – Candidate Sites Assessment Report detailed assessment, sites were examined based on any specific issues they deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepart technical supporting studies to demonstrate the site's deliverability, sustainability and detailed assessment, only those sites deemed appropriate were included for allocation.
			As part of the proposed allocation of Land West of Bridgend, development will requirements including a range of placemaking principles and masterplan developm Policy PLA3 – Page 71). Green Infrastructure and Outdoor Recreation Facilities will in accordance with Policy COM10 and Outdoor Recreation Facilities and Na Supplementary Planning Guidance'. The proposed allocation will also be required to corridor between the site and Laleston to retain the separate identities and character preventing coalescence.
874	We support Draft Policy SP6 (Sustainable Housing Strategy) and its first priority which is to (1) Prioritise the re-use of previously developed (Brownfield) land and (4) Support windfall residential development at	Change wording of Policy COM11 to:	Comment noted. The title of Policy COM11 will be amended so that it is the same in main document. The Key in the Proposals Map will also be amended to represent the Comment noted
	appropriate sites within the settlement, focussing on the re-use of previously developed land.	"The Council will promote the provision of accessible,	As worded, Policy COM11 clearly states that the Replacement LDP will promote Natural and Semi-Natural Greenspace wherever suitable opportunities arise. Such o not limited to, appropriate development proposals. However, the proposed change of flexible. Some development proposals may enable greater access to accessible unacceptable for other material planning reasons. For this reason, the proposed and
	Draft Policy COM11 relates to the provision of Natural and Semi-Natural Greenspace (including Amenity Greenspace). The title of the policy in the contents page iv refers to the policy's title as "including open space", but the heading and text of the policy itself does not refer to 'public open space' directly.	Natural and Semi- Natural Greenspace (including Amenity Green Space) wherever suitable opportunities arise, including by supporting wider	unacceptable for other material planning reasons. For this reason, the proposed an is not supported.

brough their designation as ant opportunities within these Vales and seeks to minimise ever, given the existing LDP's oly Bridgend and the Valleys aining. Additional viable and ment SP1, deliver affordable irements can be realised.

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

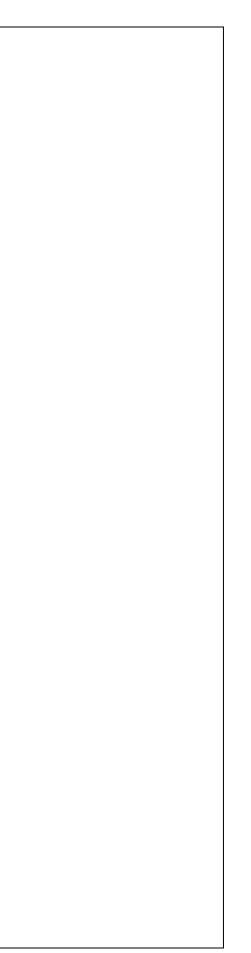
of which are greenfield. Each ment Methodology which was port (2020)). During Stage 2 ey raised in terms of their ssibility, physical character, are and submit a number of nd suitability. Proceeding this ation in the Deposit Plan.

ill be subject to site-specific ment principles (See Deposit ill be required to be delivered New Housing Development to maintain a strategic green er of these settlements whilst

in the contents page and the the correct policy.

e the provision of accessible opportunities include, but are of wording is considered too e natural greenspace but be amendment to Policy COM11

Draft Policy COM11 states that "The Council will promote the provision of accessible, Natural and Semi Natural Greenspace (including Amenity Green Space) wherever suitable opportunities arise. In this respect, the following areas are specifically allocated" The policy, sub-section COM11(7), then specifically identifies the site, Land off Waunscil Avenue, as being an area allocated for such promotion. This maintains a designation that applied to the site in the previous Local Development Plan.	development proposals that enable the realisation of and greater accessibility to such space. In this respect, the following areas are specifically allocated"	
The accompanying Proposals Map, however, on page 27 (and a corner of the inset map on page 34) shows the site in light green, see Figure 2 of our letter dated 20 July 2021.		
The key denotes this colour as an Outdoor Recreational Facility, see figure 3, but it states that this refers to Draft Policy COM11. The Outdoor Recreational Facility policy is actually Draft Policy COM10.		
This appears to be an error. The key should refer to Natural and Semi-Natural Greenspace (including Amenity Greenspace) under that colour, and Policy COM11.		
We also consider that in promoting opportunities for the provision of accessible, Natural and Semi Natural Greenspace (including Amenity Green Space), the policy should be clearer that 'promotion' includes supporting development that will help to enable the creation of such space, including its accessibility.		
As an example, our proposal would present a realistic opportunity to achieve the provision of accessible natural and semi- natural greenspace as part of the overall development. The Inspector at appeal APP/F6915/A/08/2080480/WF recognised that the proposed landscaping, community		



			-
	route and new access points would "significantly improve the provision of public open space in the area."		
	The Inspector added that the proposal presented a realistic opportunity to achieve the provision of public open space as part of the development, as have other appeal decisions (APP/F6915/A/05/1180711 and APP/F6915/A/11/2154074) at the site.		
	We therefore believe that Draft Policy COM11 should say:		
	"The Council will promote the provision of accessible, Natural and Semi-Natural Greenspace (including Amenity Green Space) wherever suitable opportunities arise, including by supporting wider development proposals that enable the realisation of and greater accessibility to such space. In this respect, the following areas are specifically allocated"		
610	Yes unless you're planning to provide an extra GP surgery and employ more nurses and GP's then the community will suffer	Concerns regarding provision of GP Surgeries	In relation to the provision of additional GP surgeries, the Council has been engagin University Health Board from the outset of the Replacement LDP process. Early m the level and spatial distribution of growth proposed was clarified to help facilitate all As part of Stage 3 of the Candidate Site Assessment, the health board amongst oth invited to provide comments in respect of those sites identified as suitable for futur allocation in the Deposit LDP. Whilst the Council cannot ultimately control provide services, close working relationships will continue and be maintained with Cwm Health Board. This will be key to service provision planning as site allocations within
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	We support the prioritisation of the re-use of previously developed sites within Policy SP6. The Replacement LDP must encourage and support appropriate previously developed/under-utilised sites to come forward, including those within Bridgend Town Centre.	Support re-use of previously developed sites	Comments noted
554	Some areas don't need more housing	No changes proposed	Comment noted The Deposit Plan has been underpinned by the identification of the most appropria and housing provision, all of which have been based upon well informed, evidence need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferre Options). A range of growth scenarios across the whole Replacement LDP period

aging with Cwm Taf Morgannwg y meetings were held to ensure e alignment of service provision. t other consultation bodies were uture development and possible provision of primary healthcare wm Taf Morgannwg University rithin the Deposit Plan progress.

priate scale of economic growth ce based judgements regarding erred Strategy Strategic Growth eriod have been analysed and

			discussed within the Strategic Growth Options Background Paper. This has constructed 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 approximate to enable a balanced level of housing and employment provision that will achieve suggest support existing settlements and maximise viable affordable housing delivery.
			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 A sustainable settlement hierarchy. Based upon the consideration of a compreh sustainable growth will be appropriately directed towards the Main Settlements of B with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly
287	Support - please see covering letter submitted	No changes proposed - support	Comments noted
308	Policy SP6: Sustainable Housing Strategy Llanmoor support the Sustainable Housing Strategy set out in Policy SP6, in particular the provision for 9,207 homes. The housing requirement of 7,575 homes should be a minimum requirement as set out previously. Llanmoor also agree development should be distributed in accordance with the regeneration and sustainable growth strategy provided in Policy SP1 to ensure an appropriate and sustainable supply of housing.	To set a minimum housing requirement of 7,575 homes	No action is considered necessary. The rationale for the Growth Strategy is detailed Options Background Paper and the support for the Growth Strategy is noted. An app (10%) has been embedded into the Deposit Plan and the basis for which is clear Trajectory Background Paper. With a 10% flexibility allowance, the Anticipated And remain deliverable throughout the plan period even if a significant unforeseen scenar a strategic site, should occur. As such, the total level of housing provision with appropriately to ensure delivery of the housing requirement. 7,575 homes is indeed
	Policy COM1: Housing Allocations Llanmoor support the inclusion of Land West of Bridgend being identified as a strategic site within the emerging housing allocations reflecting Bridgend's role as a Primary Key Settlement within the Settlement Hierarchy and Spatial Strategy. It further reflects the Sustainable Housing Strategy in Policy SP6.	Bridgend as a	Comments noted.
	Policy COM3: On-site Affordable Housing Llanmoor support the target affordable housing percentage of 15% for Bridgend Housing Market Area, whilst also supporting the 20% affordable housing contribution identified for Land West of Bridgend which have been identified having regard to the Local Housing Market Assessment, the Plan Wide Viability Assessment and site specific viability testing.	None – support area-wide and site-specific affordable housing policies	Comments noted.

considered how the County formed the most appropriate appropriate plan requirement sustainable patterns of growth,

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

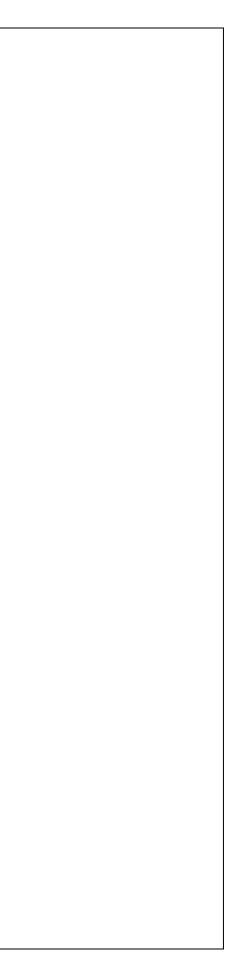
ed within the Strategic Growth appropriate flexibility allowance clearly set out in the Housing Annual Build Rate (AABR) will enario, such as non-delivery of vithin the Deposit Plan is set ed the housing requirement.

	Summary Llanmoor is wholly supportive of the allocation of land West of Bridgend as a sustainable urban extension within the DCD and is committed to delivering homes to meet Bridgend's needs. Whilst concerns remain over the viability and deliverability of other allocations, Llanmoor is supportive of the Replacement LDP, and are keen to ensure that the future plan is robust and sound for the next plan period.	None further to the above.	Comments noted.
40		Valley.	Comments noted (refer to Plan-Wide Viability Assessment and site-specific viability
	delivery of housing in this location is both logical and sustainable in meeting much needed market and affordable housing.		
	<ul> <li>Policy COM1: Housing Allocation The landowners of Candidate Site PS.3 support the inclusion within the wider Parc Afon Ewenni housing allocation under Policy COM1(1) and reflected on the Deposit Plan</li> </ul>	proposed. Representor supports the	Comments noted (refer to Candidate Site Assessment, Plan-Wide Viability Assessm assessments).

lity assessments).

## sment and site-specific viability

Proposals Map. The landowners maintain	Afon Ewenni	
that their land forms an integral section to	(COM1(1)) and	
the COM1(1) allocation. With the imminent	the area-wide and	
approval of the Section 73 Application the	site-specific	
principle of up to 240 dwellings, including	affordable	
affordable, is accepted within the first phase	housing policies.	
of the RLDP, and allows a co-ordinated and	• •	
comprehensive development of the wider		
allocation to come forward. The		
landowners support the vigorous process		
that has been undertaken to date to ensure		
confidence that the sites included within the		
RLDP are deliverable. The landowners		
have reviewed the Candidate Site		
Assessment Report in respect of their site,		
candidate site PS.3, as the wider allocation		
area is considered under candidate sites		
299.C1 and 352.41. The landowners agree		
that the site will make an important		
contribution to meeting the housing need of		
the County Borough during the next plan		
period and that the site promoters for the		
relevant candidate sites have and will		
continue to adopt a coordinated and		
comprehensive approach to the		
development.		
Policy COM3: On-site Affordable Housing		
Whilst there is a 15% target affordable		
housing contribution identified for the		
Bridgend Housing Market Area (HMA)		
under Policy COM3, the allocation at		
COM1(1) Parc Afon Ewenni has a 20%		
target affordable housing contribution which		
has been identified having regard to the		
Local Housing Market Assessment, the		
Plan Wide Viability Assessment and site		
specific viability testing. The landowners		
note the requirement for 20% affordable		
housing target for the whole COM1(1)		
allocation, the distribution of which can be		
agreed going forward.		
Summary		
Overall, the landowners are in support of the		
RLDP and specifically support the land at		
Parc Afon Ewenni being allocated for		
housing under Policy COM1(1), and		
containing the Candidate Site PS.3. The		



Itinget and not a set figure. It is also questionable whether this policy is required as Policies COM3, 4, 5 all cover the same points.has been robustly assessed through plan-wide and site-specific viability appraisals Assessment and the Affordable Housing packground Paper). SP6 has been fo wording detailed within paragraph 5.59 in the Development Plans Manual (Edit delivery of this key housing policy. The affordable housing provision is clearly supporting paragraph 5.322 of the Deposit Plan. No further revisions are therefor this basis.Policy COM3 (on-site provision of AH) – BDW would like to query why affordable housing requirements are set at higher housing requirements are set at a reginer area- specific affordable Pyle, Maesteg)Query why different area- specific affordable to the area-wide affordable housing requirements within COM3.Whilst related, Policies COM 3, COM 4 and COM 5 provision is clearly supporting paragraph 5.322 of the Deposit Plan. No further revisions are therefor this basis.Policy COM3 (on-site provision of AH) – BDW would like to query why affordable housing market area generally (Bridgend, Pyle, Maesteg)Query why different area- specific affordable to an encluded in COM3.The rationale for the area-based and site-specific policies is clearly set out wit viability, the nuances of which can never be fully captured in an area-wide st target, as opposed to the braader area identified in the high level appraisal. The rather the site specific being a refinement of the high level appraisal. The rather the site specific being a refinement of the high level appraisal. The rather the site specific casts, constraints and faceted approach is paramount to ensure Council's aspirations for delivering high- both realistic and deliverable. This evidence has indicated that higher leve	_				
figure (1,977) should be described as a target and not a set figure. It is also questionable whether this policy is required as Policies COM3, 4, 5 all cover the same points.COM2 to describe the affordable housing figure as a 'target' and "artiget and 's 'target' and' ourcid as Policies COM3, 4, 5 all cover the same points.COM2 to describe the affordable housing figure as a 'target' and "artiget' and 's 'target' and' ourcid as Policies COM3, 4, 5 all cover the same points.COM2 to describe the affordable housing figure as a 'target' and "artiget' and 's 'target' and' and 5.It estrategic Policy of (SF6). The contribution the Replacement LDP cam make to has been robustly assessed through plan-wide and site-specific viability appraisals wording detailed within paragraph 5.3.22 of the Deposit Plan. No further revisions are therefor this basis.Policy COM3 (on-site provision of AH) – bowing requirements are set at higher levels on the strategic sites than in the housing requirements are set at higher levels on the strategic sites than in the housing market area generally (Bridgend, Pyle, Maesteg)Query on what affordable housing officit affordable housing order area identified in the high level appraisal" (WG, 2020, p to the area-wide affordable housing requirements within COM3.Policy COM6 (residential density) – BDW would like clarification of what constitutes 'an a efficient and appropriate density's setQuery on what constitutes 'an efficient and appropring plane and appropriate density's setPolicy COM6 (residential density) – BDW would like clarification of what constitutes 'an a efficient and appropriate density's setQuery on what constitutes 'an efficient and an efficient and appropriate density's set </td <th></th> <td></td> <td>site has been established through the outline permission P/15/368/OUT, and the imminent approval of the Section 73 application Ref. P/20/1017/RLX, which is reflected in the allocation within the RLDP. Whilst the site is pending permission the landowners are fully supportive of development within the first phase of the RLDP. Finally, the landowners will continue to work with adjacent land landowners and do not prejudice the delivery of development at the wider site as it is considered the delivery of housing in this location is both logical and sustainable in meeting much needed market and affordable housing and supports the growth and spatial strategy of the RLDP.</td> <td></td> <td></td>			site has been established through the outline permission P/15/368/OUT, and the imminent approval of the Section 73 application Ref. P/20/1017/RLX, which is reflected in the allocation within the RLDP. Whilst the site is pending permission the landowners are fully supportive of development within the first phase of the RLDP. Finally, the landowners will continue to work with adjacent land landowners and do not prejudice the delivery of development at the wider site as it is considered the delivery of housing in this location is both logical and sustainable in meeting much needed market and affordable housing and supports the growth and spatial strategy of the RLDP.		
<ul> <li>Policy COM3 (on-site provision of AH) – BDW would like to query why affordable housing requirements are set at higher levels on the strategic sites than in the housing market area generally (Bridgend, Pyle, Maesteg)</li> <li>Policy COM6 (residential density) – BDW would like clarification of what constitutes 'an efficient and appropriate density' as set</li> <li>Query on what constitutes 'an</li> <li>Query on what constitutes 'an</li> <li>Policy COM6 (residential density) as set</li> <li>Policy COM6 (residential density) as set</li> </ul>		253	figure (1,977) should be described as a target and not a set figure. It is also questionable whether this policy is required as Policies COM3, 4, 5 all cover	COM2 to describe the affordable housing figure as a 'target' and merge with Policies COM 3, 4	the Strategic Policy 6 (SP6). The contribution the Replacement LDP can make to a has been robustly assessed through plan-wide and site-specific viability appraisals Assessment and the Affordable Housing Background Paper). SP6 has been for wording detailed within paragraph 5.59 in the Development Plans Manual (Editidelivery of this key housing policy. The affordable housing provision is clearly i supporting paragraph 5.3.22 of the Deposit Plan. No further revisions are therefore.
BDW would like to query why affordable housing requirements are set at higher levels on the strategic sites than in the housing market area generally (Bridgend, Pyle, Maesteg)different area- specific affordable housing policies are included in COM3.Background Paper. Within any broad housing market area, there will inevitably by viability, the nuances of which can never be fully captured in an area-wide st Development Plans Manual, "much more insight can be gained which can result i targets, as opposed to the broader area identified in the high level appraisal" (WG, 2020, p to the area-wide affordable housing requirements within COM3, there are also site requirements. The former are based on the Plan-Wide Viability Assessment, the latt viability testing, which has involved analysis of more specific costs, constraints and faceted approach is paramount to ensure Council's aspirations for delivering high- both realistic and deliverable. This evidence has indicated that higher levels of supported on certain sites as detailed within COM3.Policy COM6 (residential density) – BDW would like clarification of what constitutes 'an efficient and appropriate density' as setQuery on what efficient andNo action is considered necessary. The Replacement LDP seeks to maximise i through Sustainable Placemaking and Good Design, in accordance with Planning P achieve these principles by enabling mixed, socially inclusive, sustainable communiti					Whilst related, Policies COM 3, COM 4 and COM 5 provide criteria-based policies for provision, off-site affordable housing provision and affordable housing exception detailed policy coverage on these distinct forms of affordable housing provision addition to COM2 and all of which support delivery of Strategic Policy 6 (SP6). As the related policies is not supported.
would like clarification of what constitutes constitutes 'an efficient and appropriate density' as set efficient and constitutes 'an efficient and constitut			BDW would like to query why affordable housing requirements are set at higher levels on the strategic sites than in the housing market area generally (Bridgend,	different area- specific and site- specific affordable housing policies are included in	The rationale for the area-based and site-specific policies is clearly set out with Background Paper. Within any broad housing market area, there will inevitably be viability, the nuances of which can never be fully captured in an area-wide str Development Plans Manual, "much more insight can be gained which can result in targets, as opposed to the broader area identified in the high level appraisal. The rather the site specific being a refinement of the high level appraisal" (WG, 2020, pa to the area-wide affordable housing requirements within COM3, there are also site requirements. The former are based on the Plan-Wide Viability Assessment, the latt viability testing, which has involved analysis of more specific costs, constraints and s faceted approach is paramount to ensure Council's aspirations for delivering high-of both realistic and deliverable. This evidence has indicated that higher levels of supported on certain sites as detailed within COM3.
			would like clarification of what constitutes 'an efficient and appropriate density' as set	constitutes 'an	No action is considered necessary. The Replacement LDP seeks to maximise it through Sustainable Placemaking and Good Design, in accordance with Planning P achieve these principles by enabling mixed, socially inclusive, sustainable communit types and sizes to meet the needs of residents at an efficient and appropriate dens

ent policy to support delivery of o affordable housing provision als (refer to Plan-Wide Viability formulated in accordance the dition 3) and COM2 supports y identified as a target within fore considered necessary on

s for on-site affordable housing ation sites, respectively. More on is considered necessary in as such, the proposal to merge

within the Affordable Housing be pockets of higher or lower study. As outlined within the it in refined affordable housing The two are not contradictory, para 5.89). Hence, in addition site-specific affordable housing atter are based on site-specific ad site requirements. This dualh-quality new communities are of affordable housing can be

e its contribution to well-being Policy Wales. COM6 seeks to nities through a range of house nsity. Rather than specifying a

	appropriate density'	numeric requirement, COM6 sets the framework to make the most efficient use of context, thereby ensuring an appropriate balance of uses can be pursued in a manner of developments without compromising the quality of the living conditions provided.
Policy SP10 (Infrastructure) – BDW would like to query how economic infrastructure (telecommunications / broadband infrastructure) and renewable energy and low carbon technologies could reasonably be secured as S106 requirements. They are covered by other policies or legislation such as building regulations	Query on how economic infrastructure and renewable energy can be secured as s106 requirements.	No action is considered necessary. Telecommunications and low carbon technology will become increasingly important over the Replacement LDP period with the lastin and additional home working. Planning Policy Wales considers these forms of support for economic, social and environmental sustainability" and stresses that "Infrastructure or badly located can exacerbate problems rather than solving them" (para 3.61). S holistic requirement for all development proposals to be supported by sufficient existensuring such provision can be effectively co-ordinated to support the Plan. In order impacts and/or to integrate a development proposal with its surroundings, reasonable financial contributions to such infrastructure must be provided by developers where wording states that "this will be secured by means of planning agreements/obligation any such agreements will be subject to Community Infrastructure Levy Regulations at the representor's comments are noted, the proposed policy word appropriate in its current form.
BDW consider that improvements could be made to the Deposit RLDP by including a number of additional non-strategic edge of settlement housing allocations to ensure that growth can be delivered on smaller sites, for local communities, early in the plan process, and reduce the reliance on larger sites. Concerns are held over the deliverability of many of the Sites that are proposed to be allocated in the Deposit RLDP, due to a variety of issues including land ownership, topography, ecological impacts and viability. As such, a greater reliance should be placed on small to medium sized greenfield releases which is	Proposal for several non- strategic edge of settlement housing allocations	The Strategy seeks to deliver several large-scale Sustainable Urban Extensions, wisustainable communities that will incorporate a mix of complementary uses and deliver infrastructure and/or provide new supporting infrastructure. Indeed, this latter factor is the school capacity issues across the County Borough and the need for new strate enough in scale to support provision of a new primary school as a minimum. Sustain have been proposed for allocation where they can best support the Replacement I and are capable of delivering mixed use development at a scale that will enhance control Identification of appropriate Sustainable Urban Extensions has been undertaken in Search Sequence and other requirements set out in Planning Policy Wales, as evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy O Housing Trajectory Background Paper and Minimising the Loss of BMV Agricultura The rationale for the proposed allocations within the Deposit Plan is clearly outli Assessment. Without exception, all proposed sites are supported by a large body evidence to demonstrate their deliverability.
considered to be a less risky strategy. A heavily reliance is placed on placemaking which is generally supported but greater recognition needs to be highlighted in terms of ensuing that such demands do not render development unviable. Delivering no development will certainly not meet placemaking objectives.		In terms of the proposal to place a greater reliance on small to medium sized green this scale are far more likely to have an adverse impact on local communities by exact problems and it is more difficult for such sites to provide their own supporting infr sufficient critical mass. As noted in the Plan-Wide Viability Appraisal, sites of seven their own viability issues for this very reason. Therefore, the Deposit Plan has only where capacity was clearly demonstrated to accommodate the respective level of g and/or necessary facilities and infrastructure improvements could be provided in sup-
Policy COM 10: Provision of Outdoor Recreation Facilities is not supported on the basis that it requires 3.35 hectares of open space per 1,000 but the Field in Trust requirement only requires 2.4 hectares of open space per 1000 population. This level of provision is considered to be excessive and should be reduced to	Reduce Outdoor Sport and Recreation Facilities Requirements (COM10)	All new housing developments will be expected to include an appropriate level of or amenity purposes in the interest of Good Design. This is an integral means of delivering Objectives, including to reduce social and economic equalities and ensure he environment. Contrary to the representor's conclusion, COM10 is based on Fiel benchmark guidelines and allotment standards endorsed by the National Society Gardeners. The standards detailed within COM10 are not intended to represent developments and the nature of contribution will be assessed on individual merits. As "provision of a satisfactory standard of outdoor recreation space is required on all n

of land based on site-specific er that maximises the density I.

y related infrastructure is and ting impacts of the pandemic porting infrastructure "crucial ture which is poorly designed SP10 therefore sets out the existing or new infrastructure, der to mitigate likely adverse ble infrastructure provision or where necessary. The policy tions where appropriate" and s and the Tests of Necessity. ording of SP10 is considered

which is necessary to create iver improvements to existing or is particularly notable given rategic sites to be significant ainable Urban Extension sites at LDP Vision and Objectives communities.

in accordance with the Site s documented in supporting y Options Background Paper, and Land Background Paper. atlined in the Candidate Site ody of technical and viability

enfield sites, several sites of cacerbating local infratructure infrastructure until they reach veral hundred units can pose nly proposed site allocations growth within the settlement upport of the development.

outdoor recreation for public ering several Local Wellbeing healthy choice in a healthy elds in Trust recommended ety of Allotment and Leisure nt minimum provision on all As stated within COM10 itself, new housing developments"

	comply with FIT standards. It is also noted that allotment provision of 0.2 hectares per 1,000 population is required on top of this requirement.		and "the nature and type of provision will be informed by the findings of the latest Of Playspace Audit and Allotment Audit". On-site provision must comply with the access set out in the Outdoor Recreation Facilities and New Housing Development SPG reduce the benchmark guidelines, below those recommended by Fields in Trust, is r
 170	SP6: Sustainable Housing Strategy Place plans cannot be used to identify sites for development so this reference should be removed. Place plans can be used to allow the community to help shape the details of the development on an allocated site, usually through detailed design criteria.	Remove reference to Place Plans within SP6	No action considered necessary. The reference to Place Plans within SP6 is in relativity within defined settlement boundaries in accordance with all other policies in the Pl "there will be a presumption against housing development in all areas outside definition unless the proposal is considered an appropriate exceptional case as detailed in Policy COM5". An Urban Capacity Study (2020) has also been prepared as a useful SMEs who are seeking to identify potential development opportunities within settlem specifically allocated in the Replacement LDP.
	The HBF raises concern over the plan's windfall allowance both large and small is 1,060 units some 11.5% of the housing provision or 19% of allocations.	Concern regarding the small and large windfall allowance	No action is considered necessary. An Urban Capacity Study (UCS, 2020) was public Plan to provide further analysis of the potential urban capacity of the County Boroug to evidence the expected small and windfall site allowance rate. This UCS identifies ne within the proposed settlement boundaries to accommodate this particular compo- therefore demonstrates (in addition to past trends) that the small and windfall site a Replacement LDP is both realistic and deliverable. It also serves as a useful resource who are seeking to identify potential development opportunities not specifically all LDP. Refer to the Housing Trajectory Background Paper.
	COM2: Affordable Housing - the affordable housing requirement should be described as a target and not a set figure. The relationship between Policy COM2 and the other affordable housing policies COM3, 4, 5 needs to be made clear.	Proposal to describe affordable housing requirement as a target within COM2.	No action is considered necessary. Policy COM2 is the Development Management the Strategic Policy 6 (SP6). The contribution the Replacement LDP can make to a has been robustly assessed through plan-wide and site-specific viability appraisals Assessment and the Affordable Housing Background Paper). SP6 has been for wording detailed within paragraph 5.59 in the Development Plans Manual (Edition delivery of this key housing policy. The affordable housing provision is clearly in supporting paragraph 5.3.22 of the Deposit Plan. No further revisions are therefore this basis.
			Whilst related, Policies COM 3, COM 4 and COM 5 provide criteria-based policies fo provision, off-site affordable housing provision and affordable housing exception detailed policy coverage on these distinct forms of affordable housing provision an addition to COM2 and all of which support delivery of Strategic Policy 6 (SP6). As such the related policies is considered clear.
	COM3: The HBF questions why the affordable housing requirements are higher on strategic sites in Bridgend, Pyle and Maesteg than in the housing market area generally.	Query on site- specific affordable housing policies within COM3.	No action is considered necessary. The rationale for the area-based and site-specific within the Affordable Housing Background Paper. Within any broad housing market a pockets of higher or lower viability, the nuances of which can never be fully captured outlined within the Development Plans Manual, "much more insight can be gained affordable housing targets, as opposed to the broader area identified in the high level contradictory, rather the site specific being a refinement of the high level appraise. Hence, in addition to the area-wide affordable housing requirements within COM3, affordable housing requirements. The former are based on the Plan-Wide Viability based on site-specific viability testing, which has involved analysis of more specific requirements. This dual-faceted approach is paramount to ensure Council's aspiration new communities are both realistic and deliverable. This evidence has indicated that housing can be supported on certain sites as detailed within COM3.

Outdoor Sport and Children's essibility benchmark standards PG. As such, the proposal to s not supported.

elation to the delivery of sites Plan. As stated in SP6 itself, efined settlement boundaries, in Development Management ful resource to developers and ement boundaries that are not

blished alongside the Deposit ughs' settlements for housing s more than sufficient capacity ponent of housing supply. It allowance rate utilised in the urce to developers and SMEs allocated in the Replacement

nt policy to support delivery of affordable housing provision Is (refer to Plan-Wide Viability ormulated in accordance the dition 3) and COM2 supports identified as a target within fore considered necessary on

for on-site affordable housing ion sites, respectively. More are considered necessary in such, the relationship between

ecific policies is clearly set out et area, there will inevitably be ired in an area-wide study. As ed which can result in refined evel appraisal. The two are not aisal" (WG, 2020, para 5.89). 13, there are also site-specific ity Assessment, the latter are ific costs, constraints and site tions for delivering high-quality hat higher levels of affordable

	COM6: Residential Density requires development to be 'at an efficient and appropriate density' although this wording allows flexibility on a site by site basis it would also be helpful to provide some guidance on a range that would be considered acceptable.	Query on what constitutes 'an efficient and appropriate density' within COM6.	No action is considered necessary. The Replacement LDP seeks to maximise its through Sustainable Placemaking and Good Design, in accordance with Planning Por achieve these principles by enabling mixed, socially inclusive, sustainable communities types and sizes to meet the needs of residents at an efficient and appropriate densin numeric requirement, COM6 sets the framework to make the most efficient use of context, thereby ensuring an appropriate balance of uses can be pursued in a manne of developments without compromising the quality of the living conditions provided.
	SP10: Infrastructure The HBF questions the inclusion of the following requirements; 2) Economic Infrastructure – Telecommunications / broadband infrastructure and 6) Renewable energy and low carbon technologies as they are either covered by other National or local policies in or legislation such as building regulations.	Query on including economic infrastructure and renewable energy requirements within SP10	Telecommunications and low carbon technology related infrastructure is and will be over the Replacement LDP period with the lasting impacts of the pandemic and Planning Policy Wales considers these forms of supporting infrastructure "crucia environmental sustainability" and stresses that "Infrastructure which is poorly des exacerbate problems rather than solving them" (para 3.61). SP10 therefore sets out all development proposals to be supported by sufficient existing or new infrastructure can be effectively co-ordinated to support the Plan. In order to mitigate likely adverse a development proposal with its surroundings, reasonable infrastructure provision such infrastructure must be provided by developers where necessary. The policy wo secured by means of planning agreements/obligations where appropriate" and an subject to Community Infrastructure Levy Regulations and the Tests of Neces representor's comments are noted, the proposed policy wording of SP10 is consider form.
1165	General Influence of Constraints on mentioned site on Net Developable Area As a result of the above commentary, and as part of a design team which is fully aware of, and is actively involved in the master planning process taking into account Green Infrastructure, Placemaking and the newer requirements of SUDs and SAB requirements, the technical team assembled are aware of the impacts these constraints have on a site's general net-developable area. As a result of this, and as a result of the above assessment it is considered that a number of the identified sites are unlikely to deliver / yield the full quantum proposed and promoted to-date. Therefore, there is likely to be a shortfall in delivery.	General concern raised regarding net developable area constraints	No action is considered necessary. A detailed plethora of evidence has been provid the delivery of the proposed allocations, including numerous site investigations a analysis and masterplans. This provides a high degree of certainty that the indicati on a site by site basis. As such, this generic comment is unsubstantiated and not su
	To conclude, our client, Caradog Ltd does object to the currently drafted Deposit Plan through concerns being raised on the deliverability of two of the strategic sites identified for allocation – Porthcawl Waterfront and Land East of Pencoed. It is considered that, given the lack of delivery	Re-Allocate Porthcawl Waterfront as a Long-Term Regeneration Site, question the deliverability of	The proposal to allocate Land of Penprysg Road, Pencoed (87.C1) is not supp Assessment clearly states, "the candidate site is located on the periphery of Pene Sustainable Growth Area (as defined by SP1). There are highway issues associate education capacity issues in the area whereby a site of this size would further exact resolving them. Whilst the sustainability and place making credentials of the site and other more suitable sites that have been carried forward as allocations in the Deposit of such issues".

its contribution to well-being Policy Wales. COM6 seeks to hities through a range of house hsity. Rather than specifying a of land based on site-specific her that maximises the density d.

become increasingly important and additional home working. cial for economic, social and esigned or badly located can but the holistic requirement for cture, ensuring such provision rse impacts and/or to integrate on or financial contributions to vording states that "this will be any such agreements will be essity. Therefore, whilst the lered appropriate in its current

vided to the Council to support s and appraisals, constraints ative densities are achievable supported.

pported. The Candidate Site encoed, which is identified as ited with the site in addition to acerbate without the ability of are acknowledged, there are osit Plan without the presence

	in 30 years on Porthcawl Waterfront, this site should not be included in the housing numbers for allocation, and this should be re-allocated as a long-term regeneration sites under Policy COM1. Given the lack of delivery over 30 years, it is difficult to understand, despite the work undertaken to-date, how this site could be seen as any differently now and is considered too undeliverable and should not be counted upon. As a result, this leaves opportunity for other, suitable and deliverable sites such as candidate site 87.C1 - Land of Penprysg Road, Pencoed. Coupled with the constraints identified at Land East of Pencoed, question marks are raised as to whether the site can yield the full 770 dwellings and associated infrastructure requirements given these constraints, and not have an unacceptable impact on any existing buildings / residents owing to the significant flood risk constraint. As a result, this leaves opportunity for other, suitable and deliverable sites, in the same growth zone, such as candidate site 87.C1 - Land of Penprysg Road, Pencoed to come forward and meet housing requirements.	of Penprysg Road, Pencoed.	Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subjective of its sustainability, deliverability and viability credentials in the same manner as all of has been a substantial change in circumstances to demonstrate the site can be delived. DP period, as indicated within the housing trajectory. The Council has now purch over Phase 1 (Salt Lake), coastal defence works are progressing on site and are ore end of 2022. Partnership options are currently being explored in order to bring forwar has commenced in relation to procurement mechanisms and a formal procurement commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted b owner and a significant majority of the site is not reliant on coastal defence works owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now nor be unable to progress and come forward together, as further evidenced by the extense evidence. In summary therefore, the proposal to alter Porthcawl Waterfront to a Allocation is both unsubstantiated and not supported. As documented in the Candidate Site Assessment, the Land South of Bridgend (Isla robustly demonstrated delivery in accordance with the requirements set out in the DA detailed plethora of evidence has been provided to the Council to support its deliver investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora of equirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close d site-promoters, followed by effective collaboration and involvement with a range of sta Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasin
	Furthermore, owing to the unmet need and extant backlog of affordable housing, as identified within the LHMA (2021) a flexible Affordable Housing Exception Sites policy would assist BCBC towards achieving their affordable housing need.	Increase the flexibility of the Affordable Housing Exception Sites Policy	Proposal not supported. As detailed within the Affordable Housing Background Pa will seek to deliver the identified affordable housing target within the designated accordance with placemaking principles. Promotion of significant levels of devel (affordable housing or otherwise) is not considered conducive to sustainable pla permitted in limited, exceptional circumstances to meet a pressing housing need. Me exception sites, which are exceptions to general housing provision by their very allocated within the Plan. For these reasons, no further allowance has been mad housing delivered on exception sites as a component of affordable housing supp contribution from this policy is expected to be purposely small in scale and exception
306	The unmet requirement for affordable housing PPW11 recognises the importance of 'ensuring there is sufficient housing land available to meet the need for new private market and affordable housing'. Indeed, National Policy actively recognises how the delivery of market units can be synonymous with the delivery of much needed affordable homes via Section 106 agreements or commuted	Orsaf Kenfig Hill (Candidate Site Ref. 306.C1) and Land adjoining	The LHMA 2021 drew upon a range of socioeconomic, demographic and property ma detailed insights into the mechanics of the local housing markets in accordance Guidance. This allowed the type of need in different Housing Market Areas (e.g. tend be calculated and extrapolated over the Replacement LDP period. The LHMA forn evidence that has influenced the scale, type and location of growth within the Replace contrary to the representor's statement, it is inaccurate to claim that the need f "increased" since the 2019/20 LHMA, as each LHMA represents a snapshot at a poin Welsh Government Guidance.

bject to robust re-assessment Il other candidate sites. There livered over the Replacement rchased and has total control e due to be completed by the ward development, initial work nent exercise is scheduled to d by the Council and a private rks to come forward. A landis likely to be brought to the o reason why both phases will insive supporting deliverability o a Long-Term Regeneration

sland Farm) site promoter has a Development Plans Manual. ivery, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new dialogue with the respective stakeholders at a Stakeholder er, there were no outstanding es in the plan period (including sion of the Stakeholder Group nd Farm) trajectory are both

Paper, the Replacement LDP ted settlement boundaries in velopment in the countryside blacemaking and will only be Moreover, affordable housing y nature, are not specifically ade to incorporate affordable pply. The affordable housing ional in circumstance.

market data in order to provide nce with Welsh Government enure mix and house types) to orms a core piece of baseline lacement LDP. However, and d for affordable housing has oint in time in accordance with

sums. The LHMA (2021) calculated a total need of 5,134 affordable housing units	boosting affordable	As detailed within the Affordable Housing Background Paper, the scale of affordable distribution thereof have been key considerations when determining the overall level
from 2018-33. This calculation was enabled by considering the level of newly	housing supply	the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategics, respectively). The Plan's contribution to affordable housing provision has also
arising need, balanced against the extant		through robust viability work (plan-wide and site-specific) to ensure formulation of
backlog of need and forthcoming supply.		policy thresholds and proportions. It also has to be recognised that the need identified
This assessment has identified an annual		the scale of the affordability gap in the market and the LDP itself is not the only a
need for 451 affordable units during the		mechanism to help address it. The LHMA itself clarifies that this headline need figure
five-year assessment period, based on the		a delivery target or even the solution to the affordability issues within the County Bo
assumption that the existing backlog will		the level of housing need within the County Borough, which the Council will seek to a
be cleared during these five years. A		market interventions as far as practically deliverable. These complementary sources
further annual need of 288 affordable units		are not limited to, Social Housing Grant and other capital/revenue grant funded so
has also been identified for the remaining		Landlord self-funded schemes, reconfiguration of existing stock, private sector leas
10 years of the LDP period. In comparison		homelessness duties into the private rented sector and re-utilisation of empty proper
with the 2019/20 LHMA which identified a		
need of 411 affordable units per annum		The proposal to allocate Land adjoining Heol-Yr-Orsaf Kenfig Hill (Candidate Sit
over the next five years, this is an increase		adjoining New Road, Kenfig Hill (Candidate Site Ref. 306.C2) as a means of boosting
in the overall affordable housing need for		is not supported. As clearly explained in the Candidate Site Assessment, the site pror
the County Borough. Within the Bridgend		to demonstrate that the site is viable through the submission of a viability assessmen
Deposit Plan Consultation, Strategic		306.C2 is located outside the settlement boundary of Kenfig Hill which is identified as
Objectives have been identified to reflect		(as defined by SP1). Notwithstanding this, a significant part of the site is heavily woo
on key issues, align with national policy		SINC. No supporting information has been provided to overcome this potential co
and to ensure an appropriate balance		required level of growth can be accommodated on less sensitive alternative sites and
between the different elements of		
sustainability. The Deposit Plan has		For the avoidance of any doubt, the representor submitted some uncorroborated high
identified a need for 9207 new homes,		Council, although no comprehensive viability assessment was provided for either sit
including 1977 affordable homes (Policy SP1) over the plan period 2018-2033. The		Stage 2 Candidate Site promoters on 21 <sup>st</sup> August 2020 to remind site promoters of the
proposed growth level of 505 dwellings per		an initial site viability assessment and providing evidence to demonstrate the financia Site promoters were also informed that any initial viability information they had gath
annum is based on a 6-year historical		this process. The same letter also explained that the South East Wales Region is c
period (2013/4-2018/19) which witnessed		use the Burrows-Hutchinson Ltd Development Viability Model (DVM) for site promoter
sustainable population growth as well as		viability appraisals and that the Council endorses use of the DVM as an appropriate
completions across the County Borough.		assessments in support of LDP Candidate Site submissions. Instructions were provi
In comparison with the LHMA, this		model should site promoters wish to use this option to undertake a site-specific vial
identified need of 1977 homes falls		up letter was sent to all Stage 2 Candidate Site promoters on 11th September to re-i
exceedingly short of the 5134 affordable		submission of Site-Specific Viability Appraisals was Monday 19th October 2020 (up t
need identified by the LHMA. Although this		detailed instructions, and the representor's claims to the contrary, no detailed viability
figure is not a target for delivery, it is an		or otherwise) was submitted to the Council to demonstrate that either site is viable of
indication of the scale of the unmet need		to allocate both sites is therefore not supported.
of affordable housing within the County		
Borough. In light of this shortfall in the		
requirement, the contribution that the		
delivery of market units can make to the		
delivery of affordable housing via S106		
contributions and commuted sums must		
not be underestimated. As a result, in light		
of the unconstrained nature of the		
proposed sites and their ability to come		
forward promptly, their delivery, and		

ble housing need and spatial vel and location of housing in strategy Options Background also been carefully analysed of viable affordable housing tified in the LHMA represents / affordable housing delivery ure should not be considered Borough. It instead indicates o address through a range of es of supply include, although schemes, Registered Social asing schemes, discharge of perties.

Site Ref. 306.C1) and Land ing affordable housing supply romoter for 306.C1 has failed ent. Secondly, the majority of as a Sustainable Growth Area boded and is designated as a constraint. Furthermore, the and serve this area.

gh level viability inputs to the site. The Council wrote to all the importance of conducting cial deliverability of their sites. athered would assist them in a collectively in agreement to ters to undertake site-specific ate tool for submitting viability ovided on how to access this iability assessment. A followe-iterate that the deadline for p to 11.59pm). Despite these ility appraisal (using the DVM e or deliverable. The proposal

	contribution to the affordable housing		
	stock, must be taken into account.		
	Interim Conclusion		
	In light of the above, Mr Nathan and		
	Leonard Evans wish to emphasise the		
	importance of allocating small-medium		
	sites in the emerging Plan and the crucial		
	contribution these can make in supporting		
	the wider, strategic aspirations of BCBC.		
	This is demonstrated by research noting		
	that larger sites may take longer to come		
	forward and, whilst the clients have no		
	doubt that the allocated sites will actively		
	deliver and successfully yield the expected		
	number of market and affordable units, it is		
	recognised that smaller residential		
	opportunities can actively contribute and		
	support these larger development sites. In		
	addition to this, given the shortfall in the		
	affordable housing requirement, the		
	crucial link between the delivery of market		
	units and affordable units must be not		
	underestimated. In this way, the		
	development potential of two		
	unconstrained and readily available sites		
	such as Land adjoining Heol Yr Orsaf and		
	Land adjoining New Road is all the more		
	valuable and, as such, the clients politely		
	request for these to be taken into		
	consideration by BCBC		
222	Range of Housing Allocations Edge of	Agree with the	Comments noted (Refer to Growth Options Background Paper, Spatial Strategy
	Settlement	growth and spatial	
		strategy	
	Policy SP6: Sustainable Housing Strategy	onatogy	
	Bellway support the Sustainable Housing		
	Strategy set out in Policy SP6, in particular		
	the provision for 9,207 homes.		
	Accordingly, the housing requirement of		
	7,575 homes is considered to be a		
	minimum requirement. Bellway agree		
	development should be distributed in		
	accordance with the regeneration and		
	sustainable growth strategy provided in		
	Policy SP1 to ensure an appropriate and		
	sustainable supply of housing. As such,		
	Bellway consider it appropriate for the		
	housing strategy to enable edge of		
	settlement sites within, and on the edge of,		
	established settlements such as land at		
I		I	1

y Options Background Paper,

Heol Fach at North Cornelly to deliver sustainable housing.		
	Allocate Land at Heol Fach, North Cornelly	The representor has submitted a comprehensive viability assessment for Land at I Therefore, demonstrating that the site is viable and deliverable. As stated in the Candidate Site Assessment (2022), "The candidate site is located Cornelly which is identified as a Sustainable Growth Area (as defined by SP1). The Active Travel network which will help foster and promote transit-oriented development be free of any significant constraints. However, whilst the Candidate Site Assessment site is considered to accord with the LDP strategy and has passed all tests of assess have decided that this site is not required for allocation as they deem a 10% flexibility.
a summary of the details for the new specific site allocations for the RLDP. Specifically, Land East of Pyle is identified to provide 1,057 units, with 300 affordable units being delivered within the RLDP. Whilst this seems to be clear that 300 C	Clarify the Plan's affordable housing contribution and allocate Land at Heol Fach, North Cornelly to deliver an additional 38 affordable dwellings	As detailed within the Affordable Housing Background Paper, the scale of affordable distribution thereof have been key considerations when determining the overall level the Replacement LDP (see also to the Strategic Growth Options and Spatial Stra Papers, respectively). The Plan's contribution to affordable housing provision has all through robust viability work (plan-wide and site-specific) to ensure formulation of policy thresholds and proportions. It also has to be recognised that the need identified the scale of the affordability gap in the market and the LDP itself is not the only a mechanism to help address it. The LHMA itself clarifies that this headline need figure a delivery target or even the solution to the affordability issues within the County Bd the level of housing need within the County Borough, which the Council will seek to a market interventions as far as practically deliverable. These complementary sources are not limited to, Social Housing Grant and other capital/revenue grant funded sc Landlord self-funded schemes, reconfiguration of existing stock, private sector leas homelessness duties into the private rented sector and re-utilisation of empty proper Table 3 within the Affordable Housing Background Paper clearly states that the earmarked for delivery within the Replacement LDP period. These units have b Replacement LDP affordable housing target. The delivery phasing would be secu agreement. The following Thematic Policies (PLA1-PLA5) detail the site-specific requ Strategic Development Sites in Regeneration Growth Areas and Sustainable Grov Thematic Policies are set within the context of SP3 and will enable its implementati Growth and Spatial Strategy identified within SP1 and Strategic Allocations identified further policy changes are considered necessary in the context of the affordable housing further policy changes are considered necessary in the context of the affordable housing further policy changes are considered necessary in the context of the affordable housing further policy c

t Heol Fach, North Cornelly.

ed on the periphery on North he site is well serviced by the hent. The site is considered to hent concludes by stating that essment, members of Cabinet ility allowance is sufficient.

ble housing need and spatial vel and location of housing in strategy Options Background also been carefully analysed of viable affordable housing tified in the LHMA represents y affordable housing delivery ure should not be considered Borough. It instead indicates o address through a range of es of supply include, although schemes, Registered Social asing schemes, discharge of perties.

he 300 affordable units are been incorporated into the cured through a future s106 quirements for the mixed-use rowth Areas. These detailed ation, in accordance with the ified within SP2. As such, no ousing delivery target.

land at Heol Fach would provide a further 38 affordable dwellings towards meeting the identified affordable housing need in the RLDP. Notwithstanding, clarification should be provided as to where the other affordable housing provision will be made within the Pyle, Kenfig and Cornelly Housing Market Area. Policy COM3: On-site Affordable Housing Bellway notes that there is a 0% target affordable housing contribution identified for Pyle, Kenfig Hill and North Cornelly Housing Market Area (HMA) under Policy COM3 and that the allocation for land East of Pyle has a 15% target affordable housing contribution which have been identified having regard to the Local Housing Market Assessment, the Plan Wide Viability Assessment and site specific viability testing. If allocated, Bellway are supportive of a 15% affordable housing target and are in agreement that affordable housing should be delivered on- site in the first instance	Support 15% affordable housing target for Land East of Pyle	The representor has submitted a comprehensive viability assessment for Land at H Therefore, demonstrating that the site is viable and deliverable. As stated in the C (2022), "The candidate site is located on the periphery on North Cornelly which is i Growth Area (as defined by SP1). The site is well serviced by the Active Travel net and promote transit-oriented development. The site is considered to be free of a However, whilst the Candidate Site Assessment concludes by stating that site is cor LDP strategy and has passed all tests of assessment, members of Cabinet have of required for allocation as they deem a 10% flexibility allowance is sufficient. The rationale for the area-based and site-specific policies is clearly set out with Background Paper. Within any broad housing market area, there will inevitably be viability, the nuances of which can never be fully captured in an area-wide stur. Development Plans Manual, "much more insight can be gained which can result in targets, as opposed to the broader area identified in the high level appraisal. The rather the site specific being a refinement of the high level appraisal" (WG, 2020, par to the area-wide affordable housing requirements within COM3, there are also site- requirements. The former are based on the Plan-Wide Viability Assessment, the latter viability testing, which has involved analysis of more specific costs, constraints and si faceted approach is paramount to ensure Council's aspirations for delivering high-qu both realistic and deliverable. This evidence has indicated that higher levels of a supported on certain sites as detailed within COM3, including 15% on-site at Land E
Summary Overall Bellway are in support of the Regeneration and Sustainable Urban Growth Led Strategy and level of housing proposed set out in the RLDP. However, Bellway strongly object to the allocation of land east of Pyle and consider it fails Test 3 of the Council's own Tests of Soundness. The proposed allocation will not deliver. It is not realistic or appropriate and is not founded on a robust and credible evidence base. Therefore it renders the RLDP unsound. Bellway recommend the land east of Pyle to be deallocated for the reasons outlined in these representations. Bellway consider the omission of land at Heol Fach as an allocation to be unsound as it fails Tests 2 and 3 of the Council's own Tests of Soundness. The housing allocations in Pyle should be robust and flexible to comply with the national standards in PPW. Furthermore, there needs to be a reasonable level of flexibility within the plan to allow the identified housing		As documented in the Candidate Site Assessment, the Land East of Pyle si demonstrated delivery in accordance with the requirements set out in the Development plethora of evidence has been provided to the Council to support its delivery investigations and appraisals, masterplans, a viability assessment, a transpo- consideration of s106 requirements, infrastructure and costs. This process has p confidence that the site is realistically deliverable, considering the full plethora of requirements, infrastructure provision and placemaking principles necessary to communities. All landowners are committed to working towards ensuring a deve delivered as a comprehensive development. The related housing trajectory was prep dialogue with the respective site-promoters, followed by effective collaboration and in stakeholders at a Stakeholder Group Meeting. As documented within the Housing Tra- there were no outstanding matters of disagreement on the completion figures or the in the plan period (including those sites with planning permission and new hou conclusion of the Stakeholder Group Meeting. As such, the representor's concerns and not supported. The rationale for the Growth Strategy is detailed within the Strategic Growth Options support for the Growth Strategy is noted. An appropriate flexibility allowance (10%) has Deposit Plan and the basis for which is clearly set out in the Housing Trajectory Backg allowance recognises the fact that there may be certain specific circumstances, un stage, that delay the delivery of sites, notwithstanding the robust frontloading of site of large flexibility allowance, chosen specifically to enable the Replacement LDP's hour comfortably deliverable in the event that a strategic site fails to come forward as anti preparation. With a 10% flexibility allowance, the Anticipated Annual Build Rate (AA

t Heol Fach, North Cornelly. Candidate Site Assessment is identified as a Sustainable network which will help foster f any significant constraints. considered to accord with the e decided that this site is not

ithin the Affordable Housing be pockets of higher or lower study. As outlined within the in refined affordable housing ne two are not contradictory, para 5.89). Hence, in addition e-specific affordable housing tter are based on site-specific site requirements. This dualquality new communities are f affordable housing can be East of Pyle (SP2(5)).

site promoter has robustly nent Plans Manual. A detailed ary, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new evelopment site that can be repared initially through close d involvement with a range of Trajectory Background Paper, ne timing and phasing of sites ousing allocations) following rns are both unsubstantiated

has been embedded into the kground Paper. The flexibility unknown at the plan making e delivery evidence. This is a busing requirement to remain nticipated at this point of plan ABR) will remain deliverable

	requirement to meet the local needs in Pyle/North Cornelly and to deliver the housing trajectory. Further justification and robust evidence has been provided to address the reasons for land at Heol Fach not being progressed forward as an allocation. Bellway strongly recommend land at Heol Fach is allocated as a reasonable alternative to land east of Pyle, not least because it is a developer led site which is capable of delivering much needed market and affordable housing in the early stage of the RLDP plan period. Plus it is in a sustainable location adjacent to the settlement edge of North Cornelly within the Pyle/ Kenfig Hill/ North Cornelly SGA.		throughout the plan period even if a significant unforeseen scenario, such as non- should occur. The representor has submitted a comprehensive viability assessment for Land at I Therefore, demonstrating that the site is viable and deliverable. As stated in the C (2022), "The candidate site is located on the periphery on North Cornelly which is Growth Area (as defined by SP1). The site is well serviced by the Active Travel net and promote transit-oriented development. The site is considered to be free of a However, whilst the Candidate Site Assessment concludes by stating that site is con LDP strategy and has passed all tests of assessment, members of Cabinet have or required for allocation as they deem a 10% flexibility allowance is sufficient.
221	Affordable Homes With regard to affordable housing, Bridgend's Local Housing Market Assessment (2021) identifies an annual need 451 affordable homes over the first 5 years of the Plan Period, based on the assumption that the existing backlog for affordable homes is cleared after the first 5 years. Thereafter, this number is expected to decrease to 288 units per year over the residual 10 years of the Plan Period. Notwithstanding this, based on the committed supply of affordable housing, only 70 dwellings per year are anticipated to be delivered from committed sites over the first 5 years of the Plan and no further sites are allocated within the Deposit are expected to come forward during these years. Actual total housing completions over these years for all housing were 579 homes during 2018/19, 477 homes during 2019/20 and 346 homes during 2020/21. Actual affordable housing completions for 2018/19 and 2020/21 equated to only 323 homes, with 53 homes under construction as at 31st March 20214. Beyond this, there is only a further 216 affordable dwellings currently with planning permission. As such, it is evident that the backlog of delivery in terms of affordable homes is worsening and will not improve during the initial 5 years of the Plan Period, and it is extremely unlikely that the Deposit Plan	Bridgend (221.C1), Land south of Coychurch, Bridgend (221.C3) and Zig Zag Lane, Porthcawl (221.C2) as a means of delivering additional affordable housing over the plan period.	The LHMA 2021 drew upon a range of socioeconomic, demographic and property ma detailed insights into the mechanics of the local housing markets in accordance Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenu be calculated and extrapolated over the Replacement LDP period. The LHMA form evidence that has influenced the scale, type and location of growth within the Replay representor's claim that the need identified by the LHMA over the plan period (5,13 'target' for delivery is factually inaccurate. As detailed within the Affordable Housing Background Paper, the scale of affordable distribution thereof have been key considerations when determining the overall leve the Replacement LDP (see also to the Strategic Growth Options and Spatial Stra Papers, respectively). The Plan's contribution to affordable housing provision has al through robust viability work (plan-wide and site-specific) to ensure formulation of policy thresholds and proportions. It also has to be recognised that the need identific the scale of the affordability gap in the market and the LDP itself is not the only a mechanism to help address it. The LHMA itself clarifies that this headline need figurn a delivery target or even the solution to the affordability issues within the County Br the level of housing need within the County Borough, which the Council will seek to a market interventions as far as practically deliverable. These complementary sourcess are not limited to, Social Housing Grant and other capital/revenue grant funded sc Landlord self-funded schemes, reconfiguration of existing stock, private sector leas homelessness duties into the private rented sector and re-utilisation of empty proper As also detailed within the Affordable Housing Background Paper, the Replacement identified affordable housing target (i.e. 1,977 affordable homes) within the designate accordance with placemaking principles. The proposal to allocate Broadlands, Bridgend (221.C1), Land south of Coychurch, Zag Lane, Porthcawl (221.C

on-delivery of a strategic site,

t Heol Fach, North Cornelly. Candidate Site Assessment is identified as a Sustainable network which will help foster f any significant constraints. considered to accord with the e decided that this site is not

narket data in order to provide nee with Welsh Government nure mix and house types) to rms a core piece of baseline placement LDP. However, the 134 affordable homes) is the

able housing need and spatial vel and location of housing in Strategy Options Background also been carefully analysed of viable affordable housing tified in the LHMA represents y affordable housing delivery pure should not be considered Borough. It instead indicates to address through a range of es of supply include, although schemes, Registered Social easing schemes, discharge of perties.

nt LDP will seek to deliver the ated settlement boundaries in

h, Bridgend (221.C3) and Zig s therefore not supported.

will achieve the target 5,134 affordable homes over the Plan Period, given only 1,977 affordable homes are planned within Deposit Policy SP1 (Regeneration and Sustainable Growth Strategy) and Policy SP6 (Sustainable Housing Strategy). Whilst it is acknowledged the 451 affordable homes figure is a 'target' rather than an absolute requirement, it is nonetheless not considered sufficient affordable homes are planned over the Plan Period. The existing housing strategy is clearly destined to underdeliver in terms of affordable homes and therefore other strategies should be considered to remedy the worsening position with regard to affordable homes.

Soundness: The Deposit Plan as currently drafted fails Tests 1, 2 and 3 in terms of Plan Period, as it fails to appropriately plan for the identified affordable housing needs of the County Borough.

Recommendation: In view of the likely failure of the housing trajectory as currently phased and the resultant shortfall of allocated sites to provide affordable homes within the suggested timeframes, there is a need to allocate reasonable additional sites within Plan Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1, to assist to address existing and future issues in delivering affordable homes in the County Borough. The following affordable housing provision could be provided by each of the Persimmon Homes West Wales sites, based on the Deposit Policy COM3 (On-Site Provision of Affordable Housing) figures:

Land at Broadlands, Bridgend (221.C1): 35 affordable homes (based on the 20% affordable homes rate within the wider Land West of Bridgend (SP2(3) strategic allocation). Informed by the Sustainability Appraisal Report, the Candidate Site Assessment published to accompany the Deposit Plan confirms and provides reasoned justification for the outcome of the site selection process in respect of each candidate site.

In relation to Broadlands (Candidate Site Ref: 221.C1) specifically, the Assessment states,

"The candidate site is located on the periphery of Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). There are education capacity issues in the area whereby a site of this size would further exacerbate without the ability of resolving them. Whilst the sustainability and place making credentials of the site are acknowledged, there are other more suitable sites that have been carried forward as allocations in the Deposit Plan without the presence of such issues. Therefore, this site will not be allocated in the Deposit Plan".

In relation to Land South of Coychurch (Candidate Site Ref: 221.C3) specifically, the Assessment states,

"The candidate site is located on the periphery of Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The proposed development would look to provide 500 homes which would have a significant impact on local education provision without providing a new education facility on site. Additionally, when compared to the other sites in Bridgend that are carried forward as allocations in the Plan, the site is less sustainable in that it is located further from the town centre with poor pedestrian connectivity. Development of this site would result in an increase in the dependency on the private car and therefore not encourage a modal shift to more sustainable forms of active travel. The development would also result in the loss of good quality agricultural land. Therefore this site is not specifically allocated in the Deposit Plan".

In relation to Zig Zag Lane (Candidate Site Ref: 221.C2) specifically, the Assessment states,

The Candidate Site is located outside the settlement of Porthcawl which is identified as a Regeneration Growth Area (as defined by SP1). Brownfield sites will primarily provide the required capacity to accommodate growth within Regeneration Growth Areas. The site represents a large scale Greenfield extension to the existing settlement of Porthcawl that would undermine the Preferred Strategy. Therefore it is considered to represent an unacceptable incursion into the open countryside, as such this site will not be assessed as part of Stage 2.

Whilst the Council notes the representor's proposals to include these three sites within the Replacement LDP, these proposals are note supported for the reasons outlined above.

Land south of Coychurch, Bridgend (221.C3): 77 affordable homes (based on the 15% affordable homes rate within the Bridgend housing market area). Zig Zag Lane, Porthcawl (221.C2): 133 affordable homes at (based on the 30% affordable homes rate within the Porthcawl		
housing market area).		
Policy COM3 (On-site Affordable Housing) – Support is given to the suggested affordable housing % rates within the different housing market areas and housing allocations as proposed	Support COM3 area-based and site-specific affordable housing thresholds	Comments noted.
Flexibility AllowanceThe flexibility allowance in terms ofhousing numbers is to be included in aPlan to ensure it will remain effective in theevent of changing circumstance such asnon-delivery of key sites and/ or otherunforeseen issues. The Development PlanManual (Edition 3) (March 2020) indicatesthat a 10% flexibility allowance should bethe starting point in terms of housingprovision (housing requirement plusflexibility). It is acknowledged that LDPsacross Wales apply higher and lowerallowances, however Persimmon HomesWest Wales are of the view that theappropriate rate should be set based onlocal circumstances. In view of theCouncil's significant reliance on strategicand large sites, a greater level of flexibilityshould be allowed for in the Plan toincrease the chance of meeting thehousing needs of the County Borough.Such a flexibility allowance will assist inovercoming uncertainties regardinghousing deliverability and viability. In viewof the above, the 20% flexibility allowanceset out in Deposit Policy SP1(Regeneration and Sustainable GrowthStrategy) is deemed to be a sensibleapproach, given the risk of non-delivery ofthe housing requirement within the PlanPeriod due to fewer larger sitesallocations. Notwithstanding this, it is notconsidered the 20% flexibility should be	allowance	Comments noted. An appropriate flexibility allowance (10%) has been embedded in basis for which is set out in the Housing Trajectory Background Paper. The flexibilit fact that there may be certain specific circumstances, unknown at the plan making s of sites, notwithstanding the robust frontloading of site delivery evidence. This is a chosen specifically to enable the Replacement LDP's housing requirement to remain the event that a strategic site fails to come forward as anticipated at this point of pl flexibility allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable even if a significant unforeseen scenario, such as non-delivery of a strategic site, sh

d into the Deposit Plan and the bility allowance recognises the g stage, that delay the delivery is a large flexibility allowance, main comfortably deliverable in f plan preparation. With a 10% able throughout the plan period , should occur.

		-
used as justification to override the fundamental concerns with the Anticipated Annual Build Rates / trajectory set out in the Deposit Plan. Soundness: The Deposit Plan is deemed to be 'sound' in terms of the approach to flexibility allowance in housing numbers. Recommendation: N/A		
Supporting Evidence Base to Site Allocations In response of the Preferred Strategy consultation, the Welsh Government made clear to the Council: "Demonstrating delivery of the strategy, strategic sites and 'roller forward' allocations will be critical and this should be supported by your authority's evidence in the Deposit plan". Persimmon Homes West Wales consider that whilst it is accepted that any financial and commercial viability information may need to remain confidential, for transparency the background candidate sites documents specifically referenced in terms of demonstrating deliverability of the residential site allocations and those referenced within the Deposit Plan itself as 'Key Supporting Information' for each proposed allocation should be published as part of the Regulation 18 consultation. This is currently not the case. Paragraph 7.11 of the Development Plans Manual (Edition 3) (March 2020) states "Throughout the plan preparation process it is important that all the information relating to the plan is kept in a single placeHaving clear and effective mechanisms for accessing the necessary information will ensure transparency and ensure stakeholders can be involved more effectively in the process". In view of this lack of transparency, it is not possible to ascertain whether a fair and balanced assessment of each candidate sites has been undertaken. Soundness: The Deposit Plan as currently drafted fails Test 2 and 3 in terms of the lack of publication of a robust and credible	housing allocations and the 'Key Supporting Information' documents referenced in the Deposit Plan, prior to the submission of the Plan for examination	In response to the representor's request, whilst site-specific deliverability evidence part of the evidence base to the Deposit Plan, such information will be published in a the plan is submitted for examination. Key supporting information for each propos available at the examination.

ce has not been published as in an appropriate format when posed allocation will be made

evidence base to demonstrate compliance.		
Recommendation: To ensure the evidence base informing the County Borough's decision-making in the Plan preparation and allocation of sites is robust and credible, the candidate sites evidence base associated with the proposed housing allocations and the 'Key Supporting Information' documents referenced in the Deposit Plan should be published for consideration, <u>prior to the</u> <u>submission of the Plan for examination</u> .		
Independent Financial Viability Appraisals In support of the comments throughout this letter regarding the deliverability of the Land at Broadlands (ref: 221.C1) (up to 173 homes) and Land south of Coychurch (ref: 221.C3) (up to 512 homes) in the short to medium term, Persimmon Homes West Wales submit the attached Independent Financial Viability Appraisals undertaken by Burrows-Hutchinson Ltd (July 2021).	None – viability assessments submitted for Broadlands (221.C1) and Land South of Coychurch (221.C3)	Comments noted.
Flood Risk As you will be aware, Natural Resources Wales (NRW) have previously raised concern regarding flood risk at the regeneration, strategic and large sites. Whilst flood risk is understood to have been addressed by virtue of technical information submitted as part of the candidate sites supporting documents, the impending changes to the existing Development Advice Maps resulting from the formal publication of the new Welsh Government Flood Maps for Planning, launch of the National Strategy for Flood and Coastal Erosion Risk Management and the associated update to TAN 15 are understood to potentially have significant implications for the deliverability of some of the sites proposed to be allocated for residential within the Deposit Plan. Persimmon Homes West Wales request	Review of the implications of the changes to the flood risk mapping and TAN 15 on the proposed residential allocations to be examined and formally published for public scrutiny before the Deposit Plan is submitted for examination.	Comments noted. Supporting information will be published prior to examination, including a Focussed Chan Consultation if necessary.

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<ul> <li>that the review of the implications of the changes to the flood risk mapping and TAN 15 on the proposed residential allocations to be examined and formally published for public scrutiny before the Deposit Plan is submitted for examination.</li> <li>Soundness: Whilst the approach to housing allocations and flood risk is understood to meet the test of soundness at present, the evidence base supporting all proposed site allocations will need to be subject to full review on the basis of the proposed changes of the Welsh Government Flood Map for Planning, the National Strategy for Flood and Coastal Erosion Risk Management and TAN 15, to ensure the Deposit Plan remains sound in this regard.</li> <li>Recommendation: The abovementioned review and public scrutiny by way of additional public consultation prior to the submission of the Deposit Plan should be undertaken prior to submission for examination.</li> </ul>		
Policy COM6 (Residential Density) As currently drafted, the policy wording is deemed to be vague and ineffective, as it fails to define what are deemed to be higher and lower densities for new housing development. The policy wording is ambiguous and should provide a clear understanding of the densities appropriate within differing locations in the County Borough.	Proposal for COM6 to provide a clear understanding of the densities appropriate within differing locations in the County Borough.	No action is considered necessary. The Replacement LDP seeks to maximise it through Sustainable Placemaking and Good Design, in accordance with Planning Pl achieve these principles by enabling mixed, socially inclusive, sustainable communit types and sizes to meet the needs of residents at an efficient and appropriate dens numeric requirement, COM6 sets the framework to make the most efficient use of context, thereby ensuring an appropriate balance of uses can be pursued in a manne of developments without compromising the quality of the living conditions provided.
Borough.Policy SP8 (Health & Well-being)The policy wording calls for a HealthImpact Assessment (HIA) all new majordevelopment (i.e. 10 dwellings or more).Whilst Persimmon Homes West Walessupport the principle of the requirement anHIA for strategic site development, it isconsidered a more appropriate thresholdfor residential development would be 500dwellings or more. It is considered therequirement of a HIA for schemes of 10dwellings and below is an onerousrequirement. The revised policy wording	Proposal to change SP8 to increase the threshold for a Health Impact Assessment	No action is considered necessary. SP8 reflects the direction in National Plannin health can be a material consideration in determining planning applications for increasingly recognised as an essential element of delivering sustainable developm of Planning Policy Wales, "Health Impact Assessment makes a valuable contribut may be useful when proposing or making decisions on new development along with Service Boards. Evidence on health impacts can help the planning system develop approaches towards maximising health and well-being" (para 3.24). The represent increase the threshold for a HIA is therefore not justified and not supported.

e its contribution to well-being g Policy Wales. COM6 seeks to unities through a range of house ensity. Rather than specifying a e of land based on site-specific nner that maximises the density ed.

ning Policy and Guidance that for new developments, and is opment. As stated in Edition 11 ibution towards plan making. It ith evidence collected by Public op stronger and more coherent entor's proposal to significantly

	for is set out below: "Health inequalities will be reduced and healthy lifestyles and choices encouraged by ensuring that development proposals: 4) Are supporting by a Health Impact Assessment where appropriate (major development residential development over 500 dwellings and commercial development over 50,000 sqm gross must be supported by a HIA, which demonstrates how"		
38	Within the Bridgend Deposit Plan Consultation, Strategic Objectives have been identified to reflect on key issues, align with national policy and to ensure an appropriate balance between the different elements of sustainability. The Deposit Plan has identified a need for 9,207 new homes, including 1,977 affordable homes (Policy SP1) over the plan period 2018- 2033. The proposed growth level of 505 dwellings per annum is based on a 6-year historical period (2013/14 – 2018/19) which witnessed sustainable population growth as well as completions across the County Borough. In comparison with the LHMA, this identified need of 1,977 homes falls exceedingly short of the 5,134 affordable need identified by the LHMA. Although this figure is not a target for delivery, it is an indication of the scale of the unmet need of affordable housing within the County Borough. In order for the LPA to meet the identified affordable housing need, a flexible Affordable Housing Exception Sites is required. As Paragraph 4.3.33 of the Deposit Plan states; "This Strategy provides the optimal means to address these shortfalls in affordable housing provision, whilst helping to counter-balance the mismatch between supply and demand." Policy COM5 outlines the Affordable Housing Exception Sites strategy. Coastal do not object to[COM 5]in fact fully support the concept of allowing provision for Affordable Housing Exception Sites within the replacement LDP. However, it is	Object to the 10 unit 'cap' within the Affordable Housing Exception Sites Policy (COM5) and request the removal of any dwelling limit	No action is considered necessary. As clearly stated in the Affordable Housir Replacement LDP directs the majority of growth towards areas that already bene services and facilities, or where additional capacity can be provided, in ord placemaking. Development of land within or on the periphery of urban areas is the on previously developed 'brownfield' sites. Whilst the Council expects the majority o within the defined settlement boundaries in accordance with the Plan, it is recognise factors (such as limited developable land and high land prices) may be prohibitive to in this manner. The Replacement LDP therefore includes an affordable housing ex- exception to the general housing provision policies that do not otherwise permit ne settlement boundaries. However, any resultant development will still need to have community services and facilities in nearby settlements and meet the specified criterit of the LDP. Development will also need to respond to a pressing need identified Housing Authority and comprise of no more than 10 affordable units. This is consis maximum size for a sustainable cluster of affordable housing as required on larger is therefore equally applicable to an exception site. Affordable housing clusters otherwise become increasingly unconducive to the delivery and maintenance or communities. The representor has quoted a number of extracts from national planning policy, all of by the Council in setting an appropriate affordable housing target within the Rep Affordable Housing Background Paper). Indeed, the Replacement LDP Strategy is to accommodating the level of growth identified in the Strategic Growth Options E delivering this growth through sustainable patterns of development that accord with placemaking principles, whilst maximising affordable housing delivery in high-nee exception, none of the extracts of national policy quoted by the representor just development that would otherwise be unacceptable within or adjoining existing se justification has been provided to alter the limit or capping

sing Background Paper, the nefit from good infrastructure, rder to facilitate sustainable nerefore prioritised, especially of development to take place ised that certain area specific to affordable housing delivery exception policy, which is an new housing within or outside ve reasonable access to local eria and other relevant policies ed by the LHMA and/or Local sidered to be the appropriate er housing developments and s of more than 10 units can of balanced, mixed tenure

of which were duly considered eplacement LDP (refer to the is considered most conducive Background Paper and also ith the Planning Policy Wales' eed areas. However, without justify unrestricted affordable settlements. No policy based affordable housing exception

authorities and suggested that policies] has been key to the es have "made a significant es, these policies have been ontexts. Moreover, the Council ed COM5 Affordable Housing

market data in order to provide nce with Welsh Government

Paragraph 5.3.34 of the amplification text		Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenu
which is where an objection is raised.		be calculated and extrapolated over the Replacement LDP period. The LHMA form
		evidence to influence the scale, type and location of growth within the Replacement L
Paragraph 5.3.34 states – "Affordable		levels of need for affordable housing identified within each Housing Market Area can
Housing Exception Sites must comprise of		as incorrectly alluded to by the representor. As clearly stated in National LHMA Guidar
no more than 10 units, which is the		need figure calculated by this approach should not be used as a definitive measure of
appropriate size for a sustainable cluster		Rather it should be used to improve the scale of local housing need" (para. 9, 2014).
of affordable housing. Sites larger than 10		
units can become increasingly		As detailed within the Affordable Housing Background Paper, the scale of affordable
unconducive to the delivery and		distribution thereof have been key considerations when determining the overall level
maintenance of balanced, mixed tenure		the Replacement LDP (see also to the Strategic Growth Options and Spatial Stra
communities and will therefore not be in		Papers, respectively). The Plan's contribution to affordable housing provision has also
accordance with COM5." The boldened		through robust viability work (plan-wide and site-specific) to ensure formulation of
text above is primary source of the		policy thresholds and proportions. It also has to be recognised that the need identifie
objection i.e. the 'capping' of affordable		the scale of the affordability gap in the market and the LDP itself is not the only a
housing exception sites to no more than 10		mechanism to help address it. The LHMA itself clarifies that this headline need figure
units. The reasons for these objections are		a delivery target or even the solution to the affordability issues within the County Bo
provided in greater detail in the next		the level of housing need within the County Borough, which the Council will seek to a
section.		market interventions as far as practically deliverable. These complementary sources
		are not limited to, Social Housing Grant and other capital/revenue grant funded so
		Landlord self-funded schemes, reconfiguration of existing stock, private sector leas
Material Considerations		homelessness duties into the private rented sector and re-utilisation of empty proper
Firstly, and as above it should be noted		
that Coastal support the Affordable		As also detailed within the Affordable Housing Background Paper, the Replacement I
Housing provisions as set out in the LDP		identified affordable housing target within the designated settlement boundaries in acc
Deposit Plan under Policy COM5, the		principles. COM5 does not seek to promote significant levels of affordable housin
objection is solely with the limit or capping		otherwise be out of accord with the Plan, rather, provide a mechanism to meet a
of 10 dwellings on the exception site.		limited, exceptional circumstances. Affordable housing exception sites, which are exc
		provision by their very nature, are not specifically allocated within the Plan. For
National Planning Policy – PPW 11		allowance has been made to incorporate affordable housing delivered on exception
		affordable housing supply. The affordable housing contribution from this policy is expe
Planning Policy Wales (PPW) 11		in scale and exceptional in circumstance. Therefore, the representor's statement, "in
considers good quality, affordable homes		the identified affordable housing need, a flexible Affordable Housing Exception Sit
to be the "foundation of living well which		incorrect.
brings a wide range of benefits to health,		
learning and prosperity." For this reason, it		As paragraph 5.3.33 of the Deposit Plan states, "Whilst the Council expects the majo
is essential that policy is able to provide a		place within the defined settlement boundaries, COM5 recognises that certain area
sustainable and appropriate mechanism to		limited developable land and high land prices) may be prohibitive to affordable housi
deliver balanced communities in		COM5 is therefore an exception to the general housing provision policies of the LD
appropriate locations.		permit new housing outside settlement boundaries". Therefore, an exception polic
		forward would facilitate these aims, acknowledging that 10 units is an appropriate size
PPW 11 agrees that "a community's need		of affordable units. This is considered to be of an appropriate scale as detailed in para
for affordable housing is a material		Plan, in recognition of the fact that larger sites can otherwise become increasingly u
planning consideration which must be		and maintenance of a balanced, mixed tenure community. It should be emphasised
taken into account in formulating		more than 10 affordable units would not normally be considered appropriate on larg
development plan policies and		and, therefore, it is not considered justifiable for contrasting principles to be considered
determining relevant planning		sites.
applications."		
		Ultimately, and contrary to the representor's views, proposed Policy COM5 is r
		framework to secure a significant contribution to affordable housing supply. The Cou

nure mix and house types) to rms a core piece of baseline t LDP. However, the different annot be considered 'targets' lance, "the 'headline' housing of need or as a target figure. 4).

ble housing need and spatial vel and location of housing in trategy Options Background also been carefully analysed of viable affordable housing ified in the LHMA represents v affordable housing delivery ure should not be considered Borough. It instead indicates o address through a range of es of supply include, although schemes, Registered Social asing schemes, discharge of erties.

At LDP will seek to deliver the accordance with placemaking sing development that would a pressing housing need in exceptions to general housing or these reasons, no further tion sites as a component of apected to be purposely small "in order for the LPA to meet Sites is required" is factually

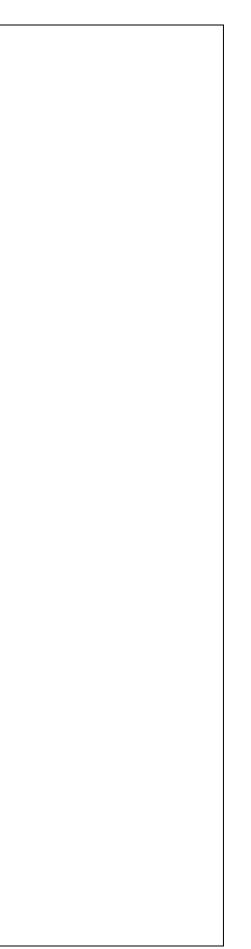
ajority of development to take rea specific factors (such as using delivery in this manner. DP, which do not otherwise blicy for small sites to come size for a sustainable cluster ragraph 5.3.35 of the Deposit v unconducive to the delivery ed that individual clusters of arger, private developer sites red appropriate on exception

not intended to provide a puncil has proactively sought

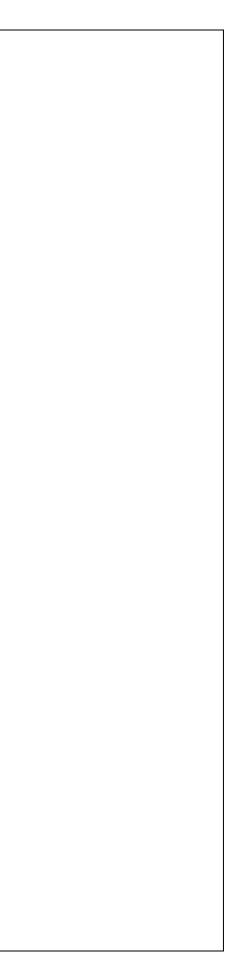
In respect of affordable housing, Paragraph 4.2.2 states: "the planning	to introduce this policy into the Replacement Plan as a means of meeting very exceptional instances. The Plan seeks to prioritise delivery of affordable housi
system must enable provision of a range of well-designed, energy efficient, good quality market and affordable housing that will contribute to the creation of sustainable places."	settlement boundaries in accordance with placemaking principles. None of the representor are considered sound justification to remove the 10 affordable unit limit pro The representor's proposal is therefore not supported.
Moreover Paragraph 4.2.25 states: "A community's need for affordable housing is a material planning consideration which must be taken into account in formulating development plan policies and determining relevant planning applications. Affordable housing for the purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers."	
Paragraph 4.2.29 states: "Where development plan policies make clear that an element of affordable housing, or other developer contributions, are required on specific sites, this will be a material consideration in determining relevant applications. Applicants for planning permission should therefore demonstrate and justify how they have arrived at a particular mix of housing, having regard to development plan policies. If, having had regard to all material considerations, the planning authority considers that the proposal does not contribute sufficiently towards the objective of creating mixed communities, then the authority will need to negotiate a revision of the mix of housing or may refuse the application."	
Paragraph 2.2.34 states: "The provision of affordable housing exception sites must be considered to help meet identified requirements and ensure the viability of the local community. Where such policies are considered appropriate it should be made clear that the release of housing sites within or adjoining existing settlements for the provision of affordable	

ery specific housing need in using within the designated ne arguments posed by the proposed for exception sites.

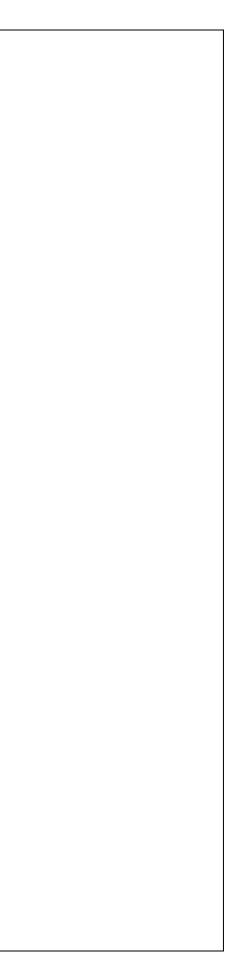
housing to meet local needs which would not otherwise be allocated in the development plan, is an exception to the policies for general housing provision."         Tachnical Advice Note (TAN)2 - Planning and Alfordable Housing (June 2006)         TAN 2 sats out further guidance which indicates how alfordable housing targets are identified through policies and the development plan and the type of action which can be taken to ensure that the target is met. The guidance also sate out that Local Housing Market Assessments should be undertaken to establish the nature and level of housing requirements in their local housing market(s) as set out in Paragraph 7.2 of the Technical Advice Note.         Paragraph 9.1 states developments plans must include an authority-wide target for alfordable housing to be provided through the planning system, based on the housing need identified. Once the target has been established, there are several policy approaches that can be used to deliver the targets, as set out in Para 10.1, which includes as site-specific targets including sites allocated solely for alfordable housing, When setting the site-capacity threaholds and site-specific targets local planning guidhorities, blocal planning authorities should balance the need for alfordable housing bage on the redient as even to ablanced and sustainable communities, local planning authorities should balance the redient as even the setting the site-capacity threaholds and site-specific targets including situable is evelopment plan. Such sites are likely to be small in relation to the total number of isles available in a local planning authority sites or up to 100% alfordable housing based on the criteria set out in the development plan. Such sites are likely to be small in relation to the total number of isles available in a local planning authority area and small in scale.		
and Affordable Housing (June 2006)         TAN 2 sets out further guidance which incloates how affordable housing targets are identified through policies and the development plan and the type of action which can be taken to ensure that the target is met. The guidance also sets out that Local Housing Market Assessments should be undertaken to establish the nature and level of housing requirements in their local housing market(s) as set out in Paragraph 7.2 of the Technical Advice Note.         Paragraph 9.1 states developments plans must include an authority-wide target for affordable housing the second policy approaches that can be used to deliver the targets, as set out in Para 10.1, which includes site specific targets (including sites allocated solely for affordable housing.) When setting the site-capacity thresholds and site-specific targets local planning authorities should balance the need for affordable housing the sustainable communities, local planning authorities may identify sites for up to 100% affordable housing based on the criteria set out in the development plan. Such sites are likely to be small in relation to the total number of sites available in a local planning authority area and small in scale.	not otherwise be allocated in the development plan, is an exception to the	
<ul> <li>indicates how affordable housing targets are identified through policies and the development plan and the type of action which can be taken to ensure that the target is met. The guidance also sets out that Local Housing Market Assessments should be undertaken to establish the nature and level of housing requirements in their local housing market(§) as set out in Paragraph 9.1 states developments plans must include an authority-wide target for affordable housing to be provided through the planning system, based on the housing need identified. Once the target has been established, there are several policy approaches that can be used to deliver the targets, as set out in Para 10.1, which includes site specific targets (including sites allocated solely for affordable housing against the viability.</li> <li>Paragraph 9.9 states, where evidence has identified a need for affordable housing to using against the viability.</li> <li>Paragraph 9.9 states, where evidence has identified a need for affordable housing to using against the viability.</li> <li>Paragraph 9.9 states, where evidence has identified a need for affordable housing to the total number of sites available in a locat planning authorities may identify states for up to 100% affordable housing to contribute to the creation of balanced and soutianable communities, local planning authorities may identify states for up to 100% affordable housing to include the indevelopment plan. Such sites are likely to be small in relation to the total number of sites available in a locat planning authority area and small in scale.</li> </ul>		
<ul> <li>must<sup>-</sup>include an authority-wide target for affordable housing to be provided through the planning system, based on the housing need identified. Once the target has been established, there are several policy approaches that can be used to deliver the targets, as set out in Para 10.1, which includes site specific targets (including sites allocated solely for affordable housing). When setting the site-capacity thresholds and site-specific targets local planning authorities should balance the need for affordable housing against the viability.</li> <li>Paragraph 9.9 states, where evidence has identified a need for affordable housing to contribute to the creation of balanced and sustainable communities, local planning authorities may identify sites for up to 100% affordable housing based on the criteria set out in the development plan. Such sites are likely to be small in relation to the total number of sites available in a local planning authority area and small in scale.</li> </ul>	indicates how affordable housing targets are identified through policies and the development plan and the type of action which can be taken to ensure that the target is met. The guidance also sets out that Local Housing Market Assessments should be undertaken 'to establish the nature and level of housing requirements in their local housing market(s)' as set out in Paragraph 7.2 of the Technical Advice	
identified a need for affordable housing to contribute to the creation of balanced and sustainable communities, local planning authorities may identify sites for up to 100% affordable housing based on the criteria set out in the development plan. Such sites are likely to be small in relation to the total number of sites available in a local planning authority area and small in scale.	must include an authority-wide target for affordable housing to be provided through the planning system, based on the housing need identified. Once the target has been established, there are several policy approaches that can be used to deliver the targets, as set out in Para 10.1, which includes site specific targets (including sites allocated solely for affordable housing). When setting the site-capacity thresholds and site-specific targets local planning authorities should balance the need for affordable housing against the	
Planning Policy Wales	identified a need for affordable housing to contribute to the creation of balanced and sustainable communities, local planning authorities may identify sites for up to 100% affordable housing based on the criteria set out in the development plan. Such sites are likely to be small in relation to the total number of sites available in a local planning authority area and small in	
	Planning Policy Wales	



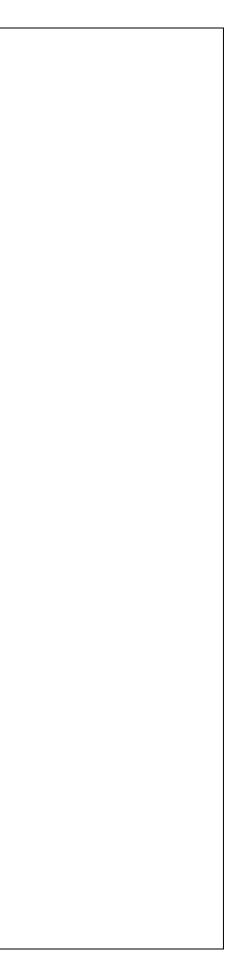
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	Within National Policy, PPW outlines within Para 4.2.25 that the need for affordable housing is a material planning consideration which must be taken into account in determining planning applications.	
	Paragraph 3.60 of PPW 11 states: "Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, <b>in particular where they meet a local</b>	
	need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the	
	<ul> <li>character of the surrounding area."</li> <li>As such, it is clear that national planning policy supports the extension of existing settlements where developments would meet a local need for affordable housing.</li> <li><u>Alternative Suggestions to Policy</u></li> </ul>	
	Structure As above, an objection is made to the cap at 10 units on the Affordable Housing Exception Sites and so the removal of a limit or cap of dwellings per site is requested.	
	After reviewing similar policies within the nearby Local Authorities of The City & County of Swansea Council, the Vale of Glamorgan, Neath Port Talbot and Pembrokeshire Coast National Park Authority (PCNPA who has recently completed their LDP review and adopted their plan in September 2020), it becomes	



apparent that there are other viable options to improve the number of dwellings allocated on Affordable Housing Exception Sites. In addition, in a review of Neath Port Talbot County Borough Council's LDP and recent Annual Monitoring report, NPT have identified their policy for allowing affordable exception sites is failing owing to a cap of 10 units.		
Neath Port Talbot County Borough Council currently use a policy that is similar to the one implemented by the council in Bridgend CBC. Policy AH 2, Affordable Housing Exception Sites, of NPTC's adopted LDP states that Small Affordable Housing Sites (9 units and below) outside the identified settlement limits are		
permitted under the following circumstances: 1. "Evidence exists in the form of a local housing needs survey (or by reference to alternative housing need data) that there is a genuine demonstrable local need for such accommodation;		
<ul> <li>2. It is demonstrated that the need for affordable housing cannot be satisfactorily met within existing settlement limits and the development is located adjacent to an existing settlement;</li> <li>3. The site is solely for affordable housing and there are clear and adequate arrangements to ensure that the benefits of affordable housing will be secured for</li> </ul>		
According to the Neath Port Talbot's October 2020 Annual Monitoring Report, assessments indicate that this strategic policy is not being successfully implemented, and the policy is now subject to review. This is exemplified as there have been no applications submitted for the Affordable Housing Exception Sites for the past year. This is the third consecutive		
year where there has been no increase in such sites. We believe that if Bridgend County Borough Council enforce their cap on the		



number of dwellings on the sites, there is the potential that a similar situation may occur.		
The Vale of Glamorgan Council		
Policy MD10 of the Vale of Glamorgan's LDP relates to development of affordable housing sites outside of settlement boundaries and states:		
"Small scale affordable housing developments will be permitted outside settlement boundaries where they have a distinct physical or visual relationship with an existing settlement and where it is demonstrated that: 1. The proposal meets an identified local need which cannot be satisfied within identified settlement boundaries; 2. The number of dwellings is in proportion to the size of the settlement; 3. The proposed dwelling(s) will be of a size, tenure and design which is commensurate with the affordable housing need; 4. In cases where the dwelling is to be provided by either a private landlord or the intended occupier, secure mechanisms are in place to ensure the property shall remain affordable in perpetuity; and 5. The development has reasonable access to the availability and proximity of local community services and facilities."		
Paragraph 7.58 of the LDP provides amplification text to Policy MD10 of the LDP and this states that "Small scale for the purpose of Policy MD10 will generally mean 10 or fewer dwellings, however, in or adjoining some of the larger settlements, proposals for more than 10 dwellings may be acceptable if required to meet specific need and where the number of dwellings is proportionate to the size of the settlement and satisfies all the other criteria against which a housing development would be judged."		



The flexibility of this policy provided with the adopted LDP at the Vale of Glamorgan Council has allowed and seen a variety of scaled applications be granted for solely 100% affordable housing across the Authority area which has made a significant contribution towards meeting the affordable housing need. It is considered that the flexibility of the quantum has been key to the deliver of such sites.

## Pembrokeshire Coast National Park Authority

Furthermore, Pembrokeshire Coast National Park Authority have recently adopted their new Local Development Plan (2020) which includes an affordable housing exception site policy (Policy 49). This policy does not propose a cap on the amount of affordable units, instead the policy (Policy 49) states:

"Affordable housing sites within or adjoining the Plan's Centres will be permitted where it can be demonstrated that:

a) The site is solely for affordable housing and there are clear and adequate mechanisms to ensure that the benefits of affordable housing will be secured for initial and subsequent occupiers; and

b) A genuine need for affordable housing has been identified; and

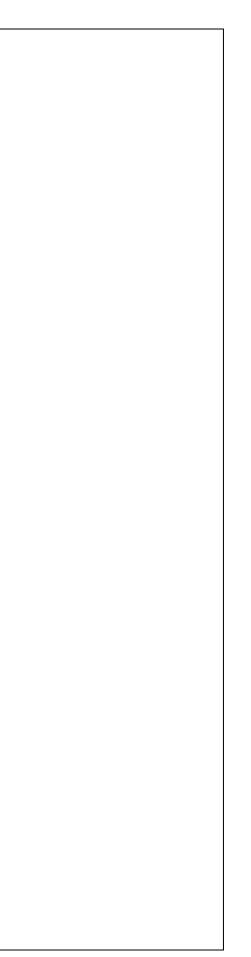
c) The site is of a size and scale that is commensurate with the defined need and is in keeping with the form and character of the Centre."

As stated above, this policy does not include a cap of units for an affordable housing exception site, instead the policy states the size of the development should be within the defined need and is in keeping with the form and character of the Centre.

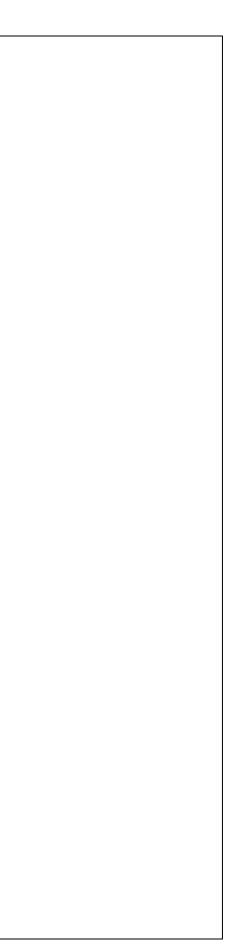
<u>City & County of Swansea Council</u> The City and County of Swansea Council's LDP (adopted February 2019) also hosts



an 100% Affordable Housing Exception Sites Policy (H6) and is framed in a more positive way where there is no specific cap on the number of dwellings permitted to be built on exception sites. For reference, the policy text for Policy H6 states: "Residential proposed twellings are for 100% of the proposed dwellings are for 100% of the proposed dwellings are for 100% of the proposed dwellings are for 100% after the settlement: 1. The site is represents a logical extension to the existing settlement and is of a scale appropriate to and in keeping with the character of the settlement: 1. The site is in a sustainable location having reasonable access to at least a basic range of services; 10. The site is in a sustainable location having reasonable access to at least a basic range of services; 10. There are binding agreements in place to ensure that the initial affordability benefits will be retained in perpetuity for all successive occupiers who meet the Council's occupancy orteria; v. It is demonstrated that there are no satisfactory alternative arrangements to meet the need within the locatily; and vi. There is no loss of land of important recreational, smently or natural heritage value. Market housing will not be permitted on 100% affordable housing exception sites. The proposed affordable housing should meet the need of locat people in perpetuity, which will be tied to the planning consent by means of a legal agreement." In light of Swansea's above policy, it is clear that there is more of an emphasis on the nature and appropriateness of the site within its surrounding context rather than a specific number of permitted dwellings. Again, the flexibility allowed within the policy wording to allow a varying degree of interpretation on quantum (which would fit more within the place marking principles of		
Sites Policy (H6) and is framed in a more positive way where there is no specific cap on the number of dwellings permitted to be built on exception sites. For reference, the policy text for Policy H6 states: "Residential proposals on sites within or adjoining existing settlements where 100% of the proposed dwellings are for Affordable Housing for Local Needs will only be permitted where: 1. The site represents a logical extension to the existing settlement and is of a scale appropriate to and in keeping with the character of the settlement: ii. The site is in a sustainable location having reasonable access to at least a basic range of services; iii. It is of a size, scale and design compatible with affordable dwelling standards and available to low or moderate income groups; iv. There are binding agreements in place to ensure that the initial affordability benefits will be retained in perpetuity for all successive occupiers who meet the Council's occupancy orienta; v. It is demonstrated that there are no satiafactory alternative arrangements to meet the need within the locality; and vi. There is no loss of land of important recreational, amenity or natural heritage value. Market housing will not be permitted on 100% affordable housing exception sites. The proposed slocal people in perpetuity, which will be tide to the planning coment by means of a legal agreement." In light of Swarses's above policy, it is clear that there is more of an emphasis on the nature and appropriateness of the site within its surrounding context rather than a specific number of permitted dwallings. Again, the flexibility allowed within the policy wording to allow a varying degree of interpretation on quantum (which would fit	an 100% Affordable Housing Exception	
<ul> <li>positive way where there is no specific cap on the number of dwellings permitted to be built on exception sites. For reference, the policy text for Policy H6 states:</li> <li>"Residential proposals on sites within or adjoining existing settlements where 100% of the proposed dwellings are for Affordable Housing for Local Needs will only be permitted where: <ul> <li>i. The site represents a logical extension to the existing settlement at logical extension to the existing settlement;</li> <li>ii. The site represents a logical extension to the existing settlement;</li> <li>iii. The site is no sustainable location having reasonable access to at least a basic range of services;</li> <li>iii. It is of a size, scale and design comparishe with affordable to low or moderate income groups;</li> <li>iv. There are binding agreements in place to ensure that the initial affordability benefits occupatory offeria;</li> <li>v. There is no loss of land of important recreational, amenity or natural heritage value. Markethousing will not permitted value arrangements to meet the need within the locality; and</li> <li>vi. There is no loss of land of important recreational, amenity or natural heritage value. Markethousing will be teal to thousing exception sites. The proposed affordable housing exception sites of land of important recreational, amenity or antural heritage value. Markethousing exception is the site market housing exception sites of land of important recreational, amenity or matural heritage value. Markethousing the housing exception sites are the need affordable housing exception sites of land of important exact and are and appropriateness of the site within its surrounding context tarter than a specific number of permitted wallings.</li> </ul></li></ul>	• •	
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policy wording to allow a varying degree of interpretation on quantum (which would fit		
interpretation on quantum (which would fit	-	
more within the placemaking principles of		
	more within the placemaking principles of	



	PPW 11) has seen a series of approvals		
	within the Authority since the adoption of		
	the LDP which has significantly		
	contributed towards the pressing need for		
	affordable housing across the strategic		
	housing zones.		
	nousing zones.		
	Interim Conclusion		
	In light of the above, Coastal wish to		
	emphasise that capping the number of		
	dwellings to 10 on Affordable Housing		
	Exception Sites has the potential to be		
	detrimental to reaching the Affordable		
	Housing Market Area Targets. This is		
	demonstrated where NPTC has a similar		
	restriction on the number of dwellings		
	permitted on the exception sites within the		
	LDP and this has led to there being no		
	applications coming forward on the		
	exception sites. The currently imposed cap		
	is not viable nor would it in fact make a		
	material difference to the affordable		
	housing provision to the areas that are in		
	need as identified by the Adopted Local		
	Development Plan.		
	Therefore, flexibility is welcomed within the		
	policy wording to ensure no 'cap' is		
	imposed within the policy text.		
	Strategic Objectives		
	Coastal Housing Group, despite the		
	above, do fully support the Strategic		
	Objectives outlined in the Deposit Plan		
	and support the recent incentives and		
	expenditure made by the Local Authority in		
	the regeneration of the Town Centre of		
	Bridgend.		
1			
	Coastal Housing Group would firmly wish		
	to assist in the regeneration of Bridgend		
	Town Centre, and have a track record of		
	delivery such schemes in Bridgend Town		
	Centre (Example – Norton Street), as well		
	as their High-quality regeneration projects		
	in Swansea City Centre. Given this track		
	record of delivery of such high-profile and		
	successful schemes, Coastal would wish		
	to assist the Local Authority with any		



			-
	opportunity in being a delivery partner in the Town Centre of Bridgend.		
	<b>Summary</b> In summary, Coastal agree with the principle of the current Affordable Housing Site Exception Policy, however object to the specifics, in particular the 'cap' of 10 dwellings. As such, Coastal believe that Policy COM5 noted within the Bridgend Deposit Plan Consultation Document should be amended to be of a more similar mechanism to the Vale of Glamorgan Council's LDP Policy MD 10 and The City and County of Swansea Council's LDP Policy H6 which have seen more success in delivering affordable housing.		
	Owing to the unmet need and extant backlog of affordable housing, as identified within the LHMA (2021) a flexible Affordable Housing Exception Sites policy would assist BCBC towards achieving their affordable housing need. In light of the above, Coastal wish to emphasise that the potential applicants are committed to ensuring the most suitable projects for Affordable Housing Exception Sites and consider that the most appropriate approach to ensuring this will be to remove the cap of units on the exception sites policy text and allow for greater flexibility in the policy wording for Affordable Housing Exception policy COM5 during the Plan Period to 2033. Furthermore, Coastal wish to re-affirm their appetite of assisting the Local Authority with their delivery mechanism for Bridgend Town Centre regeneration projects – given Coastal's track record of this in Bridgend and in Swansea.		
162	Within the Bridgend Deposit Plan Consultation, Strategic Objectives have been identified to reflect on key issues, align with national policy and to ensure an appropriate balance between the different elements of sustainability. The Deposit Plan has identified a need for 9,207 new homes, including 1,977 affordable homes	Object to the 10 unit 'cap' within the Affordable Housing Exception Sites Policy (COM5) and request the	No action is considered necessary. As clearly stated in the Affordable Hous Replacement LDP directs the majority of growth towards areas that already ben services and facilities, or where additional capacity can be provided, in or placemaking. Development of land within or on the periphery of urban areas is th on previously developed 'brownfield' sites. Whilst the Council expects the majority within the defined settlement boundaries in accordance with the Plan, it is recogni factors (such as limited developable land and high land prices) may be prohibitive t in this manner. The Replacement LDP therefore includes an affordable housing

using Background Paper, the enefit from good infrastructure, order to facilitate sustainable therefore prioritised, especially y of development to take place nised that certain area specific to affordable housing delivery g exception policy, which is an

(Policy SP1) over the plan period 2018-	removal of any	exception to the general housing provision policies that do not otherwise permit new
2033. The proposed growth level of 505	dwelling limit	settlement boundaries. However, any resultant development will still need to have
dwellings per annum is based on a 6-year bistorical period (2012/14 2018/10)		community services and facilities in nearby settlements and meet the specified criteria
historical period (2013/14 – 2018/19)		of the LDP. Development will also need to respond to a pressing need identified
which witnessed sustainable population growth as well as completions across the		Housing Authority and comprise of no more than 10 affordable units. This is consider maximum size for a sustainable cluster of affordable housing as required on larger
County Borough. In comparison with the		is therefore equally applicable to an exception site. Affordable housing clusters
LHMA, this identified need of 1,977 homes		otherwise become increasingly unconducive to the delivery and maintenance of
falls exceedingly short of the 5,134		communities.
affordable need identified by the LHMA.		communities:
Although this figure is not a target for		The representor has quoted a number of extracts from national planning policy, all of
delivery, it is an indication of the scale of		by the Council in setting an appropriate affordable housing target within the Repl
the unmet need of affordable housing		Affordable Housing Background Paper). Indeed, the Replacement LDP Strategy is
within the County Borough. In order for the		to accommodating the level of growth identified in the Strategic Growth Options B
LPA to meet the identified affordable		delivering this growth through sustainable patterns of development that accord with
housing need, a flexible Affordable		placemaking principles, whilst maximising affordable housing delivery in high-nee
Housing Exception Sites is required.		exception, none of the extracts of national policy quoted by the representor jus
		development that would otherwise be unacceptable within or adjoining existing se
As Paragraph 4.3.33 of the Deposit Plan		justification has been provided to alter the limit or capping of 10 dwellings within the al
states; "This Strategy provides the optimal		sites policy.
means to address these shortfalls in		
affordable housing provision, whilst		The representor has also summarised the policy context in certain other Local Aut
helping to counter-balance the mismatch		"the flexibility of the quantum [of affordable housing within certain exception site po
between supply and demand." Policy		delivery of such sites", whilst emphasising the fact that some of these policies
COM5 outlines the Affordable Housing		contribution towards meeting the affordable housing need". However, in all cases
Exception Sites strategy. Valleys to Coast		developed to address locally identified needs, viability and different geographical cont
do not object to[COM 5]in fact fully		considers that the representor has misinterpreted the purpose of the proposed
support the concept of allowing provision		Exception Sites Policy, which will now be reiterated for ease of reference.
for Affordable Housing Exception Sites		
within the replacement LDP. However, it is		The LHMA 2021 drew upon a range of socioeconomic, demographic and property ma
Paragraph 5.3.34 of the amplification text		detailed insights into the mechanics of the local housing markets in accordance
which is where an objection is raised.		Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenu
		be calculated and extrapolated over the Replacement LDP period. The LHMA form
Paragraph 5.3.34 states – "Affordable		evidence to influence the scale, type and location of growth within the Replacement I
Housing Exception Sites must comprise of		levels of need for affordable housing identified within each Housing Market Area car
no more than 10 units, which is the		as incorrectly alluded to by the representor. As clearly stated in National LHMA Guida
appropriate size for a sustainable cluster		need figure calculated by this approach should not be used as a definitive measure of
of affordable housing. Sites larger than 10		Rather it should be used to improve the scale of local housing need" (para. 9, 2014)
units can become increasingly		
unconducive to the delivery and		As detailed within the Affordable Housing Background Paper, the scale of affordable
maintenance of balanced, mixed tenure		distribution thereof have been key considerations when determining the overall leve
communities and will therefore not be in		the Replacement LDP (see also to the Strategic Growth Options and Spatial Str
accordance with COM5." The boldened		Papers, respectively). The Plan's contribution to affordable housing provision has all through rebust wigh life work (plan wide and site apositie) to appure formulation of
text above is primary source of the		through robust viability work (plan-wide and site-specific) to ensure formulation of
objection i.e. the 'capping' of affordable		policy thresholds and proportions. It also has to be recognised that the need identified the second
housing exception sites to no more than 10		the scale of the affordability gap in the market and the LDP itself is not the only a
units. The reasons for these objections are		mechanism to help address it. The LHMA itself clarifies that this headline need figur
provided in greater detail in the next		a delivery target or even the solution to the affordability issues within the County B the level of housing need within the County Borough, which the Council will seek to
section.		
		market interventions as far as practically deliverable. These complementary sources

new housing within or outside ve reasonable access to local eria and other relevant policies ed by the LHMA and/or Local sidered to be the appropriate er housing developments and s of more than 10 units can e of balanced, mixed tenure

of which were duly considered eplacement LDP (refer to the is considered most conducive Background Paper and also ith the Planning Policy Wales' eed areas. However, without justify unrestricted affordable settlements. No policy based affordable housing exception

uthorities and suggested that policies] has been key to the es have "made a significant es, these policies have been ontexts. Moreover, the Council d COM5 Affordable Housing

market data in order to provide nce with Welsh Government enure mix and house types) to orms a core piece of baseline nt LDP. However, the different cannot be considered 'targets' dance, "the 'headline' housing e of need or as a target figure. 4).

able housing need and spatial vel and location of housing in Strategy Options Background also been carefully analysed of viable affordable housing tified in the LHMA represents y affordable housing delivery jure should not be considered Borough. It instead indicates to address through a range of es of supply include, although

	are not limited to, Social Housing Grant and other capital/revenue grant funded sch
Material Considerations Firstly, and as above it should be noted	Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing homelessness duties into the private rented sector and re-utilisation of empty properties.
that Valleys to Coast support the	
Affordable Housing provisions as set out in	As also detailed within the Affordable Housing Background Paper, the Replacement LE
the LDP Deposit Plan under Policy COM5,	identified affordable housing target within the designated settlement boundaries in acco
the objection is solely with the limit or	principles. COM5 does not seek to promote significant levels of affordable housing
capping of 10 dwellings on the exception	otherwise be out of accord with the Plan, rather, provide a mechanism to meet a p
site.	limited, exceptional circumstances. Moreover, affordable housing exception sites,
	general housing provision by their very nature, are not specifically allocated within the
National Planning Policy – PPW 11	no further allowance has been made to incorporate affordable housing delivered component of affordable housing supply. The affordable housing contribution from this
Planning Policy Wales (PPW) 11	purposely small in scale and exceptional in circumstance. Therefore, the representor's
considers good quality, affordable homes	the LPA to meet the identified affordable housing need, a flexible Affordable Housing Ex
to be the "foundation of living well which	is factually incorrect.
brings a wide range of benefits to health,	
learning and prosperity." For this reason, it	As paragraph 5.3.33 of the Deposit Plan states, "Whilst the Council expects the majorit
is essential that policy is able to provide a	place within the defined settlement boundaries, COM5 recognises that certain area
sustainable and appropriate mechanism to	limited developable land and high land prices) may be prohibitive to affordable housing
deliver balanced communities in	COM5 is therefore an exception to the general housing provision policies of the LDP permit new housing outside settlement boundaries". Therefore, an exception policy
appropriate locations.	forward would facilitate these aims, acknowledging that 10 units is an appropriate size
PPW 11 agrees that "a community's need	of affordable units. This is considered to be of an appropriate scale as detailed in paragr
for affordable housing is a material	Plan, in recognition of the fact that larger sites can otherwise become increasingly un
planning consideration which must be	and maintenance of a balanced, mixed tenure community. It should be emphasised t
taken into account in formulating	more than 10 affordable units would not normally be considered appropriate on large
development plan policies and	and, therefore, it is not considered justifiable for contrasting principles to be considered
determining relevant planning	sites.
applications."	
	Ultimately, and contrary to the representor's views, proposed Policy COM5 is no
In respect of affordable housing,	framework to secure a significant contribution to affordable housing supply. The Counc
Paragraph 4.2.2 states: "the planning	to introduce this policy into the Replacement Plan as a means of meeting very s
system must enable provision of a range	exceptional instances. The Plan seeks to prioritise delivery of affordable housing
of well-designed, energy efficient, good	settlement boundaries in accordance with placemaking principles. None of the a
quality market and affordable housing that	representor are considered sound justification to remove the 10 affordable unit limit prop
will contribute to the creation of	The representor's proposal is therefore not supported.
sustainable places."	
Moreover Paragraph 4.2.25 states: "A	
community's need for affordable housing	
is a material planning consideration which	
must be taken into account in formulating	
development plan policies and	
determining relevant planning	
applications. Affordable housing for the	
purposes of the land use planning system	
is housing where there are secure	
mechanisms in place to ensure that it is	
accessible to those who cannot afford	

schemes, Registered Social asing schemes, discharge of erties.

at LDP will seek to deliver the accordance with placemaking sing development that would a pressing housing need in es, which are exceptions to the Plan. For these reasons, red on exception sites as a this policy is expected to be nor's statement, "in order for g Exception Sites is required"

ajority of development to take rea specific factors (such as using delivery in this manner. DP, which do not otherwise blicy for small sites to come size for a sustainable cluster ragraph 5.3.35 of the Deposit r unconducive to the delivery ed that individual clusters of arger, private developer sites red appropriate on exception

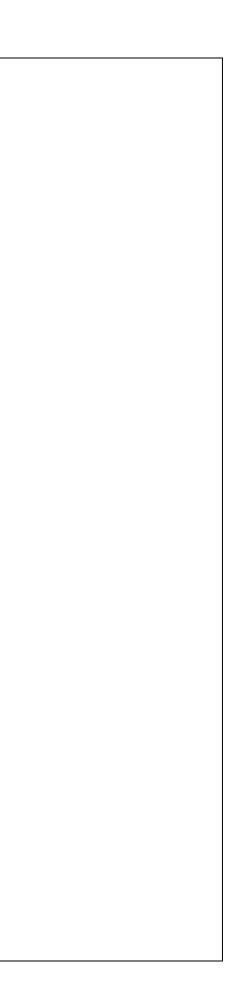
a not intended to provide a buncil has proactively sought ry specific housing need in using within the designated e arguments posed by the proposed for exception sites. market housing, both on first occupation and for subsequent occupiers."

Paragraph 4.2.29 states: "Where development plan policies make clear that an element of affordable housing, or other developer contributions, are required on specific sites, this will be a material consideration in determining relevant applications. Applicants for planning permission should therefore demonstrate and justify how they have arrived at a particular mix of housing, having regard to development plan policies. If, having had regard to all material considerations, the planning authority considers that the proposal does not contribute sufficiently towards the objective of creating mixed communities, then the authority will need to negotiate a revision of the mix of housing or may refuse the application."

Paragraph 2.2.34 states: "The provision of affordable housing exception sites must be considered to help meet identified requirements and ensure the viability of the local community. Where such policies are considered appropriate it should be made clear that the release of housing sites within or adjoining existing settlements for the provision of affordable housing to meet local needs which would not otherwise be allocated in the development plan, is an exception to the policies for general housing provision."

<u>Technical Advice Note (TAN) 2 - Planning</u> and Affordable Housing (June 2006)

TAN 2 sets out further guidance which indicates how affordable housing targets are identified through policies and the development plan and the type of action which can be taken to ensure that the target is met. The guidance also sets out that Local Housing Market Assessments should be undertaken 'to establish the nature and level of housing requirements in their local housing market(s)' as set out



in Paragraph 7.2 of the Technical Advice Note.

Paragraph 9.1 states developments plans must include an authority-wide target for affordable housing to be provided through the planning system, based on the housing need identified. Once the target has been established, there are several policy approaches that can be used to deliver the targets, as set out in Para 10.1, which includes site specific targets (including sites allocated solely for affordable housing). When setting the site-capacity thresholds and site-specific targets local planning authorities should balance the need for affordable housing against the viability.

Paragraph 9.9 states, where evidence has identified a need for affordable housing to contribute to the creation of balanced and sustainable communities, local planning authorities may identify sites for up to 100% affordable housing based on the criteria set out in the development plan. Such sites are likely to be small in relation to the total number of sites available in a local planning authority area and small in scale.

## Planning Policy Wales

Within National Policy, PPW outlines within Para 4.2.25 that the need for affordable housing is a material planning consideration which must be taken into account in determining planning applications.

Paragraph 3.60 of PPW 11 states: "Development in the countryside should be located within and adjoining those settlements where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be



demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area."

As such, it is clear that national planning policy supports the extension of existing settlements where developments would meet a local need for affordable housing.

## Alternative Suggestions to Policy Structure

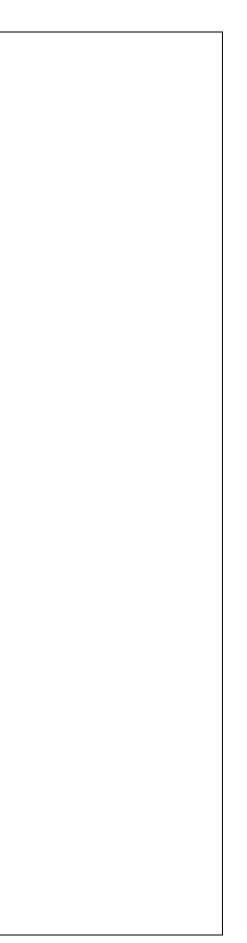
As above, an objection is made to the cap at 10 units on the Affordable Housing Exception Sites and so the removal of a limit or cap of dwellings per site is requested.

After reviewing similar policies within the nearby Local Authorities of The City & County of Swansea Council, the Vale of Glamorgan, Neath Port Talbot and Pembrokeshire Coast National Park Authority (PCNPA who has recently completed their LDP review and adopted their plan in September 2020), it becomes apparent that there are other viable options to improve the number of dwellings allocated on Affordable Housing Exception Sites. In addition, in a review of Neath Port Talbot County Borough Council's LDP and recent Annual Monitoring report, NPT have identified their policy for allowing affordable exception sites is failing owing to a cap of 10 units.

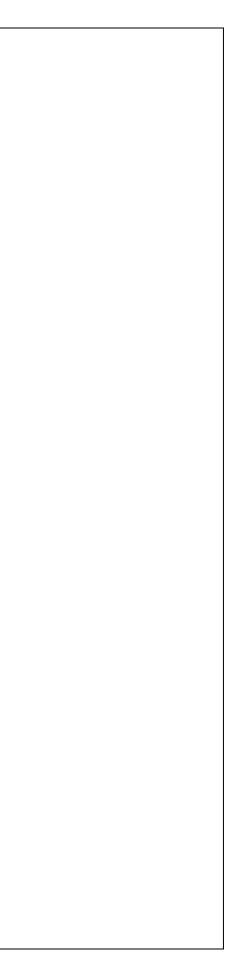
Neath Port Talbot County Borough Council currently use a policy that is similar to the one implemented by the council in Bridgend CBC. Policy AH 2, Affordable Housing Exception Sites, of NPTC's adopted LDP states that Small Affordable Housing Sites (9 units and below) outside the identified settlement limits are



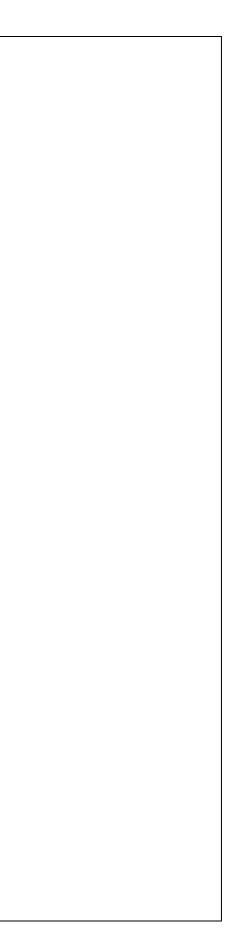
	permitted under the following		
	circumstances:		
	1. "Evidence exists in the form of a local		
	housing needs survey (or by reference to		
	alternative housing need data) that there is		
	a genuine demonstrable local need for		
	such accommodation;		
	2. It is demonstrated that the need for		
	affordable housing cannot be satisfactorily		
	met within existing settlement limits and		
	the development is located adjacent to an		
	existing settlement;		
	<b>U</b>		
	3. The site is solely for affordable housing		
	and there are clear and adequate		
	arrangements to ensure that the benefits		
	of affordable housing will be secured for		
	initial and subsequent occupiers."		
	According to the Neath Port Talbot's		
	October 2020 Annual Monitoring Report,		
	assessments indicate that this strategic		
	policy is not being successfully		
	implemented, and the policy is now subject		
	to review. This is exemplified as there		
	have been no applications submitted for		
	the Affordable Housing Exception Sites for		
	the past year. This is the third consecutive		
	year where there has been no increase in		
	such sites.		
	We believe that if Bridgend County		
	Borough Council enforce their cap on the		
	number of dwellings on the sites, there is		
	the potential that a similar situation may		
	occur.		
	The Vale of Clamergen Council		
	The Vale of Glamorgan Council		
	Dalies MD40 of the Vale of Clamonran's		
	Policy MD10 of the Vale of Glamorgan's		
	LDP relates to development of affordable		
	housing sites outside of settlement		
	boundaries and states:		
	"Small scale affordable housing		
	developments will be permitted outside		
	settlement boundaries where they have a		
	distinct physical or visual relationship with		
	an existing settlement and where it is		
	demonstrated that:		
L	1	1	



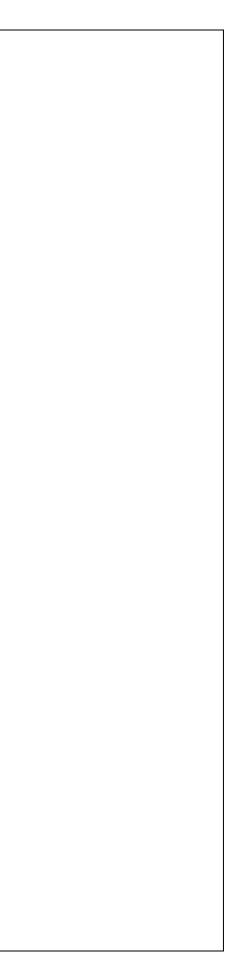
1. The proposal meets an identified local	
need which cannot be satisfied within	
identified settlement boundaries;	
2. The number of dwellings is in proportion	
to the size of the settlement;	
,	
3. The proposed dwelling(s) will be of a	
size, tenure and design which is	
commensurate with the affordable housing	
need;	
4. In cases where the dwelling is to be	
provided by either a private landlord or the	
intended occupier, secure mechanisms	
are in place to ensure the property shall	
remain affordable in perpetuity; and	
5. The development has reasonable	
access to the availability and proximity of	
local community services and facilities."	
iocal community services and facilities.	
Paragraph 7.58 of the LDP provides	
amplification text to Policy MD10 of the	
LDP and this states that "Small scale for	
the purpose of Policy MD10 will generally	
mean 10 or fewer dwellings, however, in or	
adjoining some of the larger settlements,	
proposals for more than 10 dwellings may	
be acceptable if required to meet specific	
need and where the number of dwellings	
is proportionate to the size of the	
settlement and satisfies all the other	
development would be judged."	
The flexibility of this policy provided with	
the adopted LDP at the Vale of Glamorgan	
Council has allowed and seen a variety of	
scaled applications be granted for solely	
100% affordable housing across the	
Authority area which has made a	
significant contribution towards meeting	
the affordable housing need. It is	
considered that the flexibility of the	
quantum has been key to the deliver of	
such sites.	
SUCH SILES.	
Dembrokoshiro Osset National Dark	
Pembrokeshire Coast National Park	
Authority	
Furthermore, Pembrokeshire Coast	
National Park Authority have recently	
adopted their new Local Development	
 Plan (2020) which includes an affordable	



_			
	housing exception site policy (Policy 49).		
	This policy does not propose a cap on the		
	amount of affordable units, instead the		
	policy (Policy 49) states:		
	"Affordable housing sites within or		
	adjoining the Plan's Centres will be		
	permitted where it can be demonstrated		
	that:		
	a) The site is solely for affordable housing		
	and there are clear and adequate		
	mechanisms to ensure that the benefits of		
	affordable housing will be secured for		
	initial and subsequent occupiers; and		
	b) A genuine need for affordable housing		
	has been identified; and		
	c) The site is of a size and scale that is		
	commensurate with the defined need and		
	is in keeping with the form and character		
	of the Centre."		
	As stated above, this policy does not		
	include a cap of units for an affordable		
	housing exception site, instead the policy		
	states the size of the development should		
	be within the defined need and is in		
	keeping with the form and character of the		
	Centre.		
	City & County of Swansea Council		
	The City and County of Swansea Council's		
	LDP (adopted February 2019) also hosts		
	an 100% Affordable Housing Exception		
	Sites Policy (H6) and is framed in a more		
	positive way where there is no specific cap		
	on the number of dwellings permitted to be		
	built on exception sites. For reference, the		
	policy text for Policy H6 states:		
	//////////////////////////////////////		
	"Residential proposals on sites within or		
	adjoining existing settlements where		
	100% of the proposed dwellings are for		
	Affordable Housing for Local Needs will		
	only be permitted where:		
	i. The site represents a logical extension to		
	the existing settlement and is of a scale		
	appropriate to and in keeping with the		
	character of the settlement;		



<ul> <li>Ii. The site is in a sustainable location having reasonable access to at least a basic range of sorvices;</li> <li>Iii. It is of a size, scale and design compatible with affordable dwelling standards: and available to low or moderate income groups;</li> <li>Iv. There are binding agreements in place to ensure that the initial affordablity benefits will be retained in perpetuity for all successive occupiers who meet the Council's occupancy artification;</li> <li>V. There are binding agreements in property for all successive occupiers who meet the Council's occupancy artification; and welling arrangements to meet the need within the locality; and v. There is no loss of land of important recreational, amenty or natural heritage value. Market housing will not be permitted on 100% affordable housing screption sites. The proposed affordable housing screption is subscription; which will be tied to the planning consent by means of a legal agreement."</li> <li>In light of Swanses's above policy, it is is clear that here is more of an enphasis on the nature and appropriateness of the site writin its surrounding context rather than a specific number of permitted wellings.</li> <li>Again, the flexibility allowed within the policy wording to allow avying degree of interpretation on quantum (which would fit more within the placemaking principles of PPW 11) has seen a series of approvals within the placemaking principles of PPW 11) has seen a series of approvals within the placemaking principles of PPW 11) has seen a series of approvals within the placemaking principles of PPW 11) has seen a series of approvals within the placemaking principles of PPW 11) has seen a series of approvals within the placemaking principles of PPW 11) has seen a series of approvals within the placemaking principles of PPW 11) has seen a series of approvals the targets. This is demonstrated where NPTC has a similar restriction on the number of dwellings.</li> </ul>		
basic range of services; iii. It is of a size, scale and design compatible with affordable dwelling standards and available to low or moderate income groups; iv. There are binding agreements in place to ensure that the initial affordability benefits will be retained in perpetuity for all successive occupiers; who meet the Council's occupancy criteria; v. It is demonstrated that there are no satisfactory alternative arrangements to meet the need within the locality; and vi. There is no loss of land of important recreational, amenity or natural heritage value. Market housing exception sites. The proposed affordable housing should meet the needs of local people in perpetuity, which will be tied to the planning consent by means of a legal agreement: In light of Swanses's above policy, it is clear that there is no nees of a nephasis on the nature and appropriateness of the site within its surrounding context rather than a specific number of parmitted dwellings. Again, the flexibility allowed within the policy wording to allow a varying degree of interpretation on quantum (which would fit more within the placemaking principes of the nature and appropriory within the surfact on the assignificantly contributed towards the pressing need for affordable housing access the strategic housing zones. Interim Conclusion In light of the above, Valleys to Coast wish to emphasise that capping the number of dwellings to 10 on Affordable Housing Exception Sites has the potential to be detrimental to reaching the Affordable Housing Market Area Targets. This is demonstrated where NPT C has a similar	ii. The site is in a sustainable location	
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restriction on the number of dwellings		
	restriction on the number of dwellings	



	permitted on the exception sites within the		
	LDP and this has led to there being no		
	applications coming forward on the		
	exception sites. The currently imposed cap		
	is not viable nor would it in fact make a		
	material difference to the affordable		
	housing provision to the areas that are in		
	need as identified by the Adopted Local		
	Development Plan.		
	Therefore, flexibility is welcomed within the		
	policy wording to ensure no 'cap' is		
	imposed within the policy text.		
	Summary		
	In summary, Valleys to Coast agree with		
	the principle of the current Affordable		
	Housing Site Exception Policy, however		
	object to the specifics, in particular the		
	'cap' of 10 dwellings. As such, Valleys to		
	Coast believe that Policy COM5 noted		
	within the Bridgend Deposit Plan		
	Consultation Document should be		
	amended to be of a more similar		
	mechanism to the Vale of Glamorgan		
	Council's LDP Policy MD 10 and The City		
	and County of Swansea Council's LDP		
	Policy H6 which have seen more success		
	in delivering affordable housing. Owing to		
	the unmet need and extant backlog of		
	affordable housing, as identified within the		
	LHMA (2021) a flexible Affordable Housing		
	Exception Sites policy would assist BCBC		
	towards achieving their affordable housing		
	need. In light of the above, Valleys to		
	Coast wish to emphasise that the potential		
	applicants are committed to ensuring the		
	most suitable projects for Affordable		
	Housing Exception Sites and consider that		
	the most appropriate approach to ensuring		
	this will be to remove the cap of units on		
	the exception sites policy text and allow for		
	greater flexibility in the policy wording for		
	Affordable Housing Exception policy		
	COM5 during the Plan Period to 2033.		
394	Within the Bridgend Deposit Plan	Object to the 10	No action is considered necessary. As clearly stated in the Affordable Hou
004	Consultation, Strategic Objectives have	unit 'cap' within	Replacement LDP directs the majority of growth towards areas that already be
	been identified to reflect on key issues,	the Affordable	services and facilities, or where additional capacity can be provided, in c
	align with national policy and to ensure an	Housing	placemaking. Development of land within or on the periphery of urban areas is t
			i realized and thank of on the perpinety of the and the best and perpinety of the and the best

ousing Background Paper, the enefit from good infrastructure, order to facilitate sustainable therefore prioritised, especially

appropriate balance between the different	Exception Sites	on previously developed 'brownfield' sites. Whilst the Council expects the majority of development to take place
	•	
elements of sustainability. The Deposit	Policy (COM5)	within the defined settlement boundaries in accordance with the Plan, it is recognised that certain area specific
Plan has identified a need for 9,207 new	and request the	factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery
homes, including 1,977 affordable homes	removal of any	in this manner. The Replacement LDP therefore includes an affordable housing exception policy, which is an
(Policy SP1) over the plan period 2018-	dwelling limit	exception to the general housing provision policies that do not otherwise permit new housing within or outside
2033. The proposed growth level of 505		settlement boundaries. However, any resultant development will still need to have reasonable access to local
dwellings per annum is based on a 6-year		community services and facilities in nearby settlements and meet the specified criteria and other relevant policies
historical period (2013/14 – 2018/19)		of the LDP. Development will also need to respond to a pressing need identified by the LHMA and/or Local
which witnessed sustainable population		Housing Authority and comprise of no more than 10 affordable units. This is considered to be the appropriate
growth as well as completions across the		maximum size for a sustainable cluster of affordable housing as required on larger housing developments and
County Borough. In comparison with the		is therefore equally applicable to an exception site. Affordable housing clusters of more than 10 units can
LHMA, this identified need of 1,977 homes		otherwise become increasingly unconducive to the delivery and maintenance of balanced, mixed tenure
falls exceedingly short of the 5,134		communities.
affordable need identified by the LHMA.		
Although this figure is not a target for		The representor has quoted a number of extracts from national planning policy, all of which were duly considered
delivery, it is an indication of the scale of		by the Council in setting an appropriate affordable housing target within the Replacement LDP (refer to the
the unmet need of affordable housing		Affordable Housing Background Paper). Indeed, the Replacement LDP Strategy is considered most conducive
within the County Borough. In order for the		to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also
LPA to meet the identified affordable		delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales'
housing need, a flexible Affordable		placemaking principles, whilst maximising affordable housing delivery in high-need areas. However, without
Housing Exception Sites is required.		exception, none of the extracts of national policy quoted by the representor justify unrestricted affordable
5		development that would otherwise be unacceptable within or adjoining existing settlements. No policy based
As Paragraph 4.3.33 of the Deposit Plan		justification has been provided to alter the limit or capping of 10 dwellings within the affordable housing exception
states; "This Strategy provides the optimal		sites policy.
means to address these shortfalls in		
affordable housing provision, whilst		The representor has also summarised the policy context in certain other Local Authorities and suggested that
helping to counter-balance the mismatch		"the flexibility of the quantum [of affordable housing within certain exception site policies] has been key to the
between supply and demand." Policy		delivery of such sites", whilst emphasising the fact that some of these policies have "made a significant
COM5 outlines the Affordable Housing		contribution towards meeting the affordable housing need". However, in all cases, these policies have been
Exception Sites strategy. Pobl do not		developed to address locally identified needs, viability and different geographical contexts. Moreover, the Council
object to[COM 5]in fact fully support		considers that the representor has misinterpreted the purpose of the proposed COM5 Affordable Housing
the concept of allowing provision for		Exception Sites Policy, which will now be reiterated for ease of reference.
Affordable Housing Exception Sites within		
the replacement LDP. However, it is		The LHMA 2021 drew upon a range of socioeconomic, demographic and property market data in order to provide
Paragraph 5.3.34 of the amplification text		detailed insights into the mechanics of the local housing markets in accordance with Welsh Government
which is where an objection is raised.		Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenure mix and house types) to
which is where an objection is faised.		be calculated and extrapolated over the Replacement LDP period. The LHMA forms a core piece of baseline
Paragraph 5.3.34 states – "Affordable		
		evidence to influence the scale, type and location of growth within the Replacement LDP. However, the different
Housing Exception Sites must comprise of		levels of need for affordable housing identified within each Housing Market Area cannot be considered 'targets'
no more than 10 units, which is the		as incorrectly alluded to by the representor. As clearly stated in National LHMA Guidance, "the 'headline' housing
appropriate size for a sustainable cluster		need figure calculated by this approach should not be used as a definitive measure of need or as a target figure.
of affordable housing. Sites larger than 10		Rather it should be used to improve the scale of local housing need" (para. 9, 2014).
units can become increasingly		As detailed within the Affendable Lleveine Declarge and Declarge the scale of effectable benefits the best field
unconducive to the delivery and		As detailed within the Affordable Housing Background Paper, the scale of affordable housing need and spatial
maintenance of balanced, mixed tenure		distribution thereof have been key considerations when determining the overall level and location of housing in
communities and will therefore not be in		the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background
accordance with COM5." The boldened		Papers, respectively). The Plan's contribution to affordable housing provision has also been carefully analysed
text above is primary source of the		through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing
objection i.e. the 'capping' of affordable		policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents
housing exception sites to no more than 10		the scale of the affordability gap in the market and the LDP itself is not the only affordable housing delivery

units. The reasons for these objections are	mechanism to help address it. The LHMA itself clarifies that this headline need figur
provided in greater detail in the next section.	a delivery target or even the solution to the affordability issues within the County B the level of housing need within the County Borough, which the Council will seek to
	market interventions as far as practically deliverable. These complementary sources
	are not limited to, Social Housing Grant and other capital/revenue grant funded s
	Landlord self-funded schemes, reconfiguration of existing stock, private sector lease
	homelessness duties into the private rented sector and re-utilisation of empty prope
Material Considerations	
Firstly, and as above it should be noted	As also detailed within the Affordable Housing Background Paper, the Replacement
that Pobl support the Affordable Housing	identified affordable housing target within the designated settlement boundaries in ac
provisions as set out in the LDP Deposit	principles. COM5 does not seek to promote significant levels of affordable housing
Plan under Policy COM5, the objection is	otherwise be out of accord with the Plan, rather, provide a mechanism to meet a
solely with the limit or capping of 10	limited, exceptional circumstances. Moreover, affordable housing exception sites
dwellings on the exception site.	general housing provision by their very nature, are not specifically allocated within the
	no further allowance has been made to incorporate affordable housing delivere
National Planning Policy – PPW 11	component of affordable housing supply. The affordable housing contribution from t
	purposely small in scale and exceptional in circumstance. Therefore, the represent
Planning Policy Wales (PPW) 11	the LPA to meet the identified affordable housing need, a flexible Affordable Housing
considers good quality, affordable homes	is factually incorrect.
to be the "foundation of living well which	
brings a wide range of benefits to health,	As paragraph 5.3.33 of the Deposit Plan states, "Whilst the Council expects the maj
learning and prosperity." For this reason, it	place within the defined settlement boundaries, COM5 recognises that certain are
is essential that policy is able to provide a	limited developable land and high land prices) may be prohibitive to affordable hous
sustainable and appropriate mechanism to	COM5 is therefore an exception to the general housing provision policies of the LI
deliver balanced communities in	permit new housing outside settlement boundaries". Therefore, an exception poli
appropriate locations.	forward would facilitate these aims, acknowledging that 10 units is an appropriate s
DDW 11 carees that "a community's need	of affordable units. This is considered to be of an appropriate scale as detailed in para
PPW 11 agrees that "a community's need	Plan, in recognition of the fact that larger sites can otherwise become increasingly and maintenance of a balanced, mixed tenure community. It should be emphasise
for affordable housing is a material planning consideration which must be	more than 10 affordable units would not normally be considered appropriate on lar
taken into account in formulating	and, therefore, it is not considered justifiable for contrasting principles to be considered
development plan policies and	sites.
determining relevant planning	
applications."	Ultimately, and contrary to the representor's views, proposed Policy COM5 is
appriorite.	framework to secure a significant contribution to affordable housing supply. The Cou
In respect of affordable housing,	to introduce this policy into the Replacement Plan as a means of meeting very
Paragraph 4.2.2 states: "the planning	exceptional instances. The Plan seeks to prioritise delivery of affordable hous
system must enable provision of a range	settlement boundaries in accordance with placemaking principles. None of the
of well-designed, energy efficient, good	representor are considered sound justification to remove the 10 affordable unit limit p
quality market and affordable housing that	The representor's proposal is therefore not supported.
will contribute to the creation of	
sustainable places."	
Moreover Paragraph 4.2.25 states: "A	
community's need for affordable housing	
is a material planning consideration which	
must be taken into account in formulating	
development plan policies and	
determining relevant planning	
applications. Affordable housing for the	

ure should not be considered Borough. It instead indicates b address through a range of es of supply include, although schemes, Registered Social asing schemes, discharge of erties.

at LDP will seek to deliver the accordance with placemaking sing development that would a pressing housing need in es, which are exceptions to the Plan. For these reasons, red on exception sites as a this policy is expected to be nor's statement, "in order for g Exception Sites is required"

ajority of development to take rea specific factors (such as using delivery in this manner. DP, which do not otherwise blicy for small sites to come size for a sustainable cluster ragraph 5.3.35 of the Deposit v unconducive to the delivery ed that individual clusters of arger, private developer sites red appropriate on exception

s not intended to provide a buncil has proactively sought ry specific housing need in using within the designated e arguments posed by the proposed for exception sites. purposes of the land use planning system is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers."

Paragraph 4.2.29 states: "Where development plan policies make clear that an element of affordable housing, or other developer contributions, are required on specific sites, this will be a material consideration in determining relevant applications. Applicants for planning permission should therefore demonstrate and justify how they have arrived at a particular mix of housing, having regard to development plan policies. If, having had regard to all material considerations, the planning authority considers that the proposal does not contribute sufficiently towards the objective of creating mixed communities, then the authority will need to negotiate a revision of the mix of housing or may refuse the application."

Paragraph 2.2.34 states: "The provision of affordable housing exception sites must be considered to help meet identified requirements and ensure the viability of the local community. Where such policies are considered appropriate it should be made clear that the release of housing sites within or adjoining existing settlements for the provision of affordable housing to meet local needs which would not otherwise be allocated in the development plan, is an exception to the policies for general housing provision."

Technical Advice Note (TAN) 2 - Planning and Affordable Housing (June 2006)

TAN 2 sets out further guidance which indicates how affordable housing targets are identified through policies and the development plan and the type of action which can be taken to ensure that the target is met. The guidance also sets out that Local Housing Market Assessments



should be undertaken 'to establish the	
nature and level of housing requirements	
in their local housing market(s)' as set out	
in Paragraph 7.2 of the Technical Advice	
Note.	
Paragraph 9.1 states developments plans	
must include an authority-wide target for	
affordable housing to be provided through	
• • •	
the planning system, based on the housing	
need identified. Once the target has been	
established, there are several policy	
approaches that can be used to deliver the	
targets, as set out in Para 10.1, which	
includes site specific targets (including	
sites allocated solely for affordable	
housing). When setting the site-capacity	
thresholds and site-specific targets local	
planning authorities should balance the	
need for affordable housing against the	
viability.	
Paragraph 9.9 states, where evidence has	
identified a need for affordable housing to	
contribute to the creation of balanced and	
sustainable communities, local planning	
authorities may identify sites for up to	
100% affordable housing based on the	
criteria set out in the development plan.	
Such sites are likely to be small in relation	
to the total number of sites available in a	
local planning authority area and small in	
scale.	
Planning Policy Wales	
Within National Policy, PPW outlines	
within Para 4.2.25 that the need for	
affordable housing is a material planning	
consideration which must be taken into	
account in determining planning	
<b>•</b> • • •	
applications.	
Paragraph 3.60 of PPW 11 states:	
"Development in the countryside should be	
located within and adjoining those	
settlements where it can best be	
accommodated in terms of infrastructure,	
-	
<i>,</i>	
conservation. Infilling or minor extensions	



to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity. However, new building in the open countryside away from existing settlements or areas allocated for development in development plans must continue to be strictly controlled. All new development should be of a scale and design that respects the character of the surrounding area."

As such, it is clear that national planning policy supports the extension of existing settlements where developments would meet a local need for affordable housing.

## Alternative Suggestions to Policy Structure

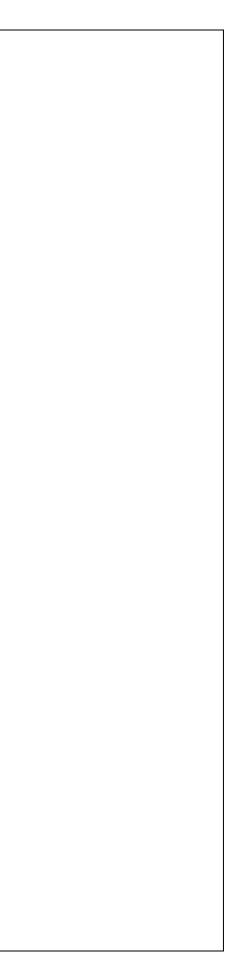
As above, an objection is made to the cap at 10 units on the Affordable Housing Exception Sites and so the removal of a limit or cap of dwellings per site is requested.

After reviewing similar policies within the nearby Local Authorities of The City & County of Swansea Council, the Vale of Glamorgan, Neath Port Talbot and Pembrokeshire Coast National Park Authority (PCNPA who has recently completed their LDP review and adopted their plan in September 2020), it becomes apparent that there are other viable options to improve the number of dwellings allocated on Affordable Housing Exception Sites. In addition, in a review of Neath Port Talbot County Borough Council's LDP and recent Annual Monitoring report, NPT have identified their policy for allowing affordable exception sites is failing owing to a cap of 10 units.

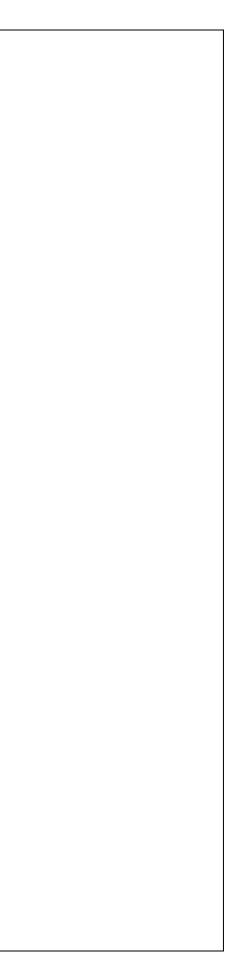
Neath Port Talbot County Borough Council currently use a policy that is similar to the one implemented by the council in Bridgend CBC. Policy AH 2, Affordable Housing Exception Sites, of NPTC's



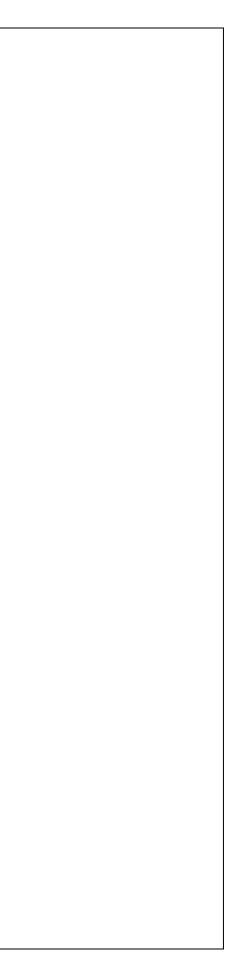
adopted LDP states that Small Affordable	
Housing Sites (9 units and below) outside	
the identified settlement limits are	
permitted under the following	
circumstances:	
1. "Evidence exists in the form of a local	
housing needs survey (or by reference to	
alternative housing need data) that there is	
a genuine demonstrable local need for	
such accommodation;	
2. It is demonstrated that the need for	
affordable housing cannot be satisfactorily	
met within existing settlement limits and	
the development is located adjacent to an	
existing settlement;	
3. The site is solely for affordable housing	
and there are clear and adequate	
arrangements to ensure that the benefits	
of affordable housing will be secured for	
initial and subsequent occupiers."	
According to the Neath Port Talbot's	
October 2020 Annual Monitoring Report,	
assessments indicate that this strategic	
policy is not being successfully	
implemented, and the policy is now subject	
to review. This is exemplified as there	
have been no applications submitted for	
the Affordable Housing Exception Sites for	
the past year. This is the third consecutive	
year where there has been no increase in	
such sites.	
We believe that if Bridgend County	
Borough Council enforce their cap on the	
number of dwellings on the sites, there is	
the potential that a similar situation may	
occur.	
The Vale of Glamorgan Council	
Policy MD10 of the Vale of Clamercan's	
Policy MD10 of the Vale of Glamorgan's	
LDP relates to development of affordable	
housing sites outside of settlement	
boundaries and states:	
"o	
"Small scale affordable housing	
developments will be permitted outside	
settlement boundaries where they have a	
distinct physical or visual relationship with	



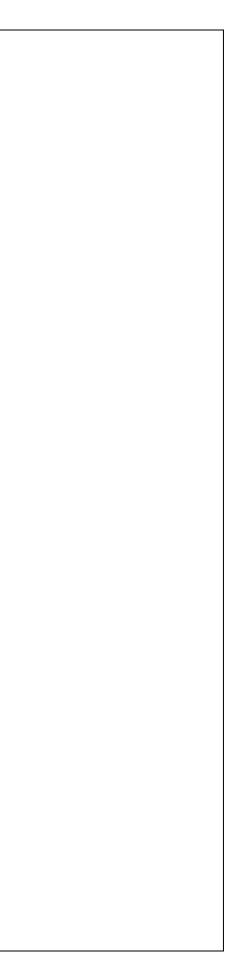
 <ul> <li>an existing settlement and where it is demonstrated that:</li> <li>1. The proposal meets an identified local need which cannot be satisfied within identified settlement boundaries;</li> <li>2. The number of dwellings is in proportion to the size of the settlement;</li> <li>3. The proposed dwelling(s) will be of a</li> </ul>	
<ul> <li>size, tenure and design which is commensurate with the affordable housing need;</li> <li>4. In cases where the dwelling is to be provided by either a private landlord or the intended occupier, secure mechanisms are in place to ensure the property shall remain affordable in perpetuity; and</li> <li>5. The development has reasonable</li> </ul>	
access to the availability and proximity of local community services and facilities." Paragraph 7.58 of the LDP provides amplification text to Policy MD10 of the LDP and this states that "Small scale for the purpose of Policy MD10 will generally mean 10 or fewer dwellings, however, in or adjoining some of the larger settlements,	
proposals for more than 10 dwellings may be acceptable if required to meet specific need and where the number of dwellings is proportionate to the size of the settlement and satisfies all the other criteria against which a housing development would be judged."	
The flexibility of this policy provided with the adopted LDP at the Vale of Glamorgan Council has allowed and seen a variety of scaled applications be granted for solely 100% affordable housing across the Authority area which has made a significant contribution towards meeting the affordable housing need. It is considered that the flexibility of the quantum has been key to the deliver of such sites.	
PembrokeshireCoastNationalParkAuthorityFurthermore,PembrokeshireCoastNationalParkAuthorityhave	



adopted their new Local Development Plan (2020) which includes an affordable housing exception site policy (Policy 49). This policy does not propose a cap on the amount of affordable units, instead the policy (Policy 49) states:		
"Affordable housing sites within or adjoining the Plan's Centres will be permitted where it can be demonstrated that: a) The site is solely for affordable housing and there are clear and adequate mechanisms to ensure that the benefits of affordable housing will be secured for initial and subsequent occupiers; and b) A genuine need for affordable housing has been identified; and c) The site is of a size and scale that is commensurate with the defined need and is in keeping with the form and character of the Centre."		
As stated above, this policy does not include a cap of units for an affordable housing exception site, instead the policy states the size of the development should be within the defined need and is in keeping with the form and character of the Centre.		
<u>City &amp; County of Swansea Council</u> The City and County of Swansea Council's LDP (adopted February 2019) also hosts an 100% Affordable Housing Exception Sites Policy (H6) and is framed in a more positive way where there is no specific cap on the number of dwellings permitted to be built on exception sites. For reference, the policy text for Policy H6 states:		
"Residential proposals on sites within or adjoining existing settlements where 100% of the proposed dwellings are for Affordable Housing for Local Needs will only be permitted where: i. The site represents a logical extension to the existing settlement and is of a scale appropriate to and in keeping with the character of the settlement;		



ii. The site is in a sustainable location		
having reasonable access to at least a		
basic range of services;		
iii. It is of a size, scale and design		
compatible with affordable dwelling		
standards and available to low or		
moderate income groups;		
iv. There are binding agreements in place		
to ensure that the initial affordability		
benefits will be retained in perpetuity for all		
successive occupiers who meet the		
Council's occupancy criteria;		
v. It is demonstrated that there are no		
satisfactory alternative arrangements to		
meet the need within the locality; and		
vi. There is no loss of land of important		
recreational, amenity or natural heritage		
value. Market housing will not be permitted		
on 100% affordable housing exception		
sites. The proposed affordable housing		
should meet the needs of local people in		
perpetuity, which will be tied to the		
planning consent by means of a legal		
agreement."		
In light of Swansea's above policy, it is		
clear that there is more of an emphasis on		
the nature and appropriateness of the site		
within its surrounding context rather than a		
specific number of permitted dwellings.		
Again, the flexibility allowed within the		
policy wording to allow a varying degree of		
interpretation on quantum (which would fit		
more within the placemaking principles of		
PPW 11) has seen a series of approvals		
within the Authority since the adoption of		
the LDP which has significantly		
contributed towards the pressing need for		
affordable housing across the strategic		
housing zones.		
Interim Conclusion		
In light of the above, Pobl wish to		
emphasise that capping the number of		
dwellings to 10 on Affordable Housing		
Exception Sites has the potential to be		
detrimental to reaching the Affordable		
Housing Market Area Targets. This is		
demonstrated where NPTC has a similar		
restriction on the number of dwellings		
	1	1



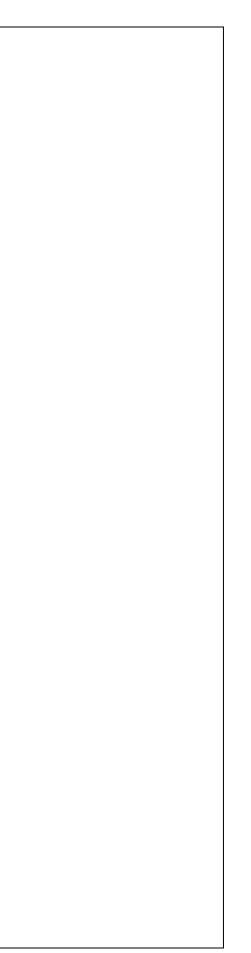
	permitted on the exception sites within the		
	LDP and this has led to there being no		
	applications coming forward on the		
	exception sites. The currently imposed cap		
	is not viable nor would it in fact make a		
	material difference to the affordable		
	housing provision to the areas that are in		
	need as identified by the Adopted Local		
	Development Plan.		
	Therefore, flexibility is welcomed within the		
	policy wording to ensure no 'cap' is		
	imposed within the policy text.		
	Summary		
	In summary, Pobl agree with the principle		
	of the current Affordable Housing Site		
	Exception Policy, however object to the		
	specifics, in particular the 'cap' of 10		
	dwellings. As such, Pobl believe that		
	Policy COM5 noted within the Bridgend		
	Deposit Plan Consultation Document		
	should be amended to be of a more similar		
	mechanism to the Vale of Glamorgan		
	Council's LDP Policy MD 10 and The City		
	and County of Swansea Council's LDP		
	Policy H6 which have seen more success		
	in delivering affordable housing. Owing to		
	the unmet need and extant backlog of		
	affordable housing, as identified within the		
	LHMA (2021) a flexible Affordable Housing		
	Exception Sites policy would assist BCBC		
	towards achieving their affordable housing		
	need. In light of the above, Pobl wish to		
	emphasise that the potential applicants		
	are committed to ensuring the most		
	suitable projects for Affordable Housing Exception Sites and consider that the most		
	appropriate approach to ensuring this will		
	be to remove the cap of units on the		
	exception sites policy text and allow for		
	greater flexibility in the policy wording for		
	Affordable Housing Exception policy		
	COM5 during the Plan Period to 2033.		
1140	The Bridgend Deposit Local Development	Proposal to	No action is considered necessary. As clearly stated in the Affordable Ho
1170	Plan (LDP) was published for consultation	remove reference	Replacement LDP directs the majority of growth towards areas that already be
	on 1st June 2021. The statutory	to any number of	services and facilities, or where additional capacity can be provided, in o
	consultation period runs for 8 weeks	dwellings from	placemaking. Development of land within or on the periphery of urban areas is
	(closing on 27th July). The Deposit LDP is	Policy COM5	on previously developed 'brownfield' sites. Whilst the Council expects the majorit

ousing Background Paper, the benefit from good infrastructure, order to facilitate sustainable s therefore prioritised, especially rity of development to take place

a draft version of the Authority's replacement LDP (covering the period	(Affordable Housing	within the defined settlement boundaries in accordance with the Plan, it is recognised that certain area specific factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery
2018-2033). Based on the updated LDP	Exception Sites).	in this manner. The Replacement LDP therefore includes an affordable housing exception policy, which is an
Delivery Agreement, the Replacement		exception to the general housing provision policies that do not otherwise permit new housing within or outside
LDP is scheduled for adoption circa Spring		settlement boundaries. However, any resultant development will still need to have reasonable access to local
2022, at which time it will replace the		community services and facilities in nearby settlements and meet the specified criteria and other relevant policies
currently adopted LDP (2006-2021) as the		of the LDP. Development will also need to respond to a pressing need identified by the LHMA and/or Local
Authority's statutory development plan		Housing Authority and comprise of no more than 10 affordable units. Contrary to the representor's views, the
Section 64(2) of the Planning and		'cap' of 10 affordable units is not considered 'arbitrary'. This is considered to be the appropriate maximum size
Compulsory Purchase Act 2004 Act		for a sustainable cluster of affordable housing as required on larger housing developments and is therefore
specifically provides that an LPA must not		equally applicable to an exception site. Affordable housing clusters of more than 10 units can otherwise become
submit an LDP unless it considers the plan		increasingly unconducive to the delivery and maintenance of balanced, mixed tenure communities.
is ready for examination. This means that		
'unsound' plans should not be submitted		The representor has quoted a number of extracts from national planning policy, all of which were duly considered
for examination. The LPA will need to		by the Council in setting an appropriate affordable housing target within the Replacement LDP (refer to the
demonstrate that the plan meets the three		Affordable Housing Background Paper). Indeed, the Replacement LDP Strategy is considered most conducive
tests of soundness:		to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also
• Test 1: Does the plan fit? (Is it clear that		delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales'
the LDP is consistent with other plans?)		placemaking principles, whilst maximising affordable housing delivery in high-need areas. However, without
• Test 2: Is the plan appropriate? (Is the		exception, none of the extracts of national policy quoted by the representor justify unrestricted affordable
plan appropriate for the area in the light of		development that would otherwise be unacceptable within or adjoining existing settlements. No policy based
the evidence?)		justification has been provided to alter the limit or capping of 10 dwellings within the affordable housing exception
• Test 3: Will the plan deliver? (Is it likely to		sites policy. The Council considers that the representor has misinterpreted the purpose of the proposed COM5
be effective?)		Affordable Housing Exception Sites Policy, which will now be reiterated for ease of reference.
Asbri Planning have been appointed by		The LHMA 2021 drew upon a range of socioeconomic, demographic and property market data in order to provide
Linc and Hale Construction to submit		detailed insights into the mechanics of the local housing markets in accordance with Welsh Government
representations to Policy COM5 -		Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenure mix and house types) to
Affordable Housing Exception Sites,		be calculated and extrapolated over the Replacement LDP period. The LHMA forms a core piece of baseline
specifically in terms of the requirement for		evidence to influence the scale, type and location of growth within the Replacement LDP.
them to comprise of no more than 10		, , , , , , , , , , , , , , , , , , ,
dwellings.		As detailed within the Affordable Housing Background Paper, the scale of affordable housing need and spatial
		distribution thereof have been key considerations when determining the overall level and location of housing in
National Policy Framework		the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background
At the national level, guidance in relation		Papers, respectively). The Plan's contribution to affordable housing provision has also been carefully analysed
to affordable housing exception sites is		through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing
contained in Future Wales and Planning		policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents
Policy Wales 11.		the scale of the affordability gap in the market and the LDP itself is not the only affordable housing delivery
		mechanism to help address it. The LHMA itself clarifies that this headline need figure should not be considered
Future Wales, the National Plan for Wales,		a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates
was published by the Welsh Government		the level of housing need within the County Borough, which the Council will seek to address through a range of
(WG) in February 2021. Policy 7 -		market interventions as far as practically deliverable. These complementary sources of supply include, although
Delivering affordable homes confirms that		are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social
•		
the delivery of affordable housing through		Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of
the planning system is one of the key		homelessness duties into the private rented sector and re-utilisation of empty properties.
priorities for the WG. Policy 7 confirms that		As also detailed within the Affordable Housing Realignaund Depart the Deplesement I, DD will easy to deliver the
LPA's through their Strategic and Local		As also detailed within the Affordable Housing Background Paper, the Replacement LDP will seek to deliver the
Development Plans planning authorities		identified affordable housing target within the designated settlement boundaries in accordance with placemaking
should develop strong evidence based		principles. COM5 does not seek to promote significant levels of affordable housing development that would
policy frameworks to deliver affordable		otherwise be out of accord with the Plan, rather, provide a mechanism to meet a pressing housing need in

housing, including setting development limited, exceptional circumstances. Moreover, affordable housing exception sites, which are exceptions to general housing provision by their very nature, are not specifically allocated within the Plan. For these reasons, plan targets based on regional estimates of housing need and local assessments. no further allowance has been made to incorporate affordable housing delivered on exception sites as a component of affordable housing supply. The affordable housing contribution from this policy is expected to be Planning Policy Wales 11 (PPW11) was purposely small in scale and exceptional in circumstance. also published by the WG in February 2021. Paragraph 4.2.34 of PPW11 As paragraph 5.3.33 of the Deposit Plan states, "Whilst the Council expects the majority of development to take confirms that: "The provision of affordable place within the defined settlement boundaries, COM5 recognises that certain area specific factors (such as housing exception sites must be limited developable land and high land prices) may be prohibitive to affordable housing delivery in this manner. considered to help meet identified COM5 is therefore an exception to the general housing provision policies of the LDP, which do not otherwise requirements and ensure the viability of permit new housing outside settlement boundaries". Therefore, an exception policy for small sites to come the local community. Where such policies forward would facilitate these aims, acknowledging that 10 units is an appropriate size for a sustainable cluster are considered appropriate it should be of affordable units. This is considered to be of an appropriate scale as detailed in paragraph 5.3.35 of the Deposit made clear that the release of housing Plan, in recognition of the fact that larger sites can otherwise become increasingly unconducive to the delivery sites within or adjoining existing and maintenance of a balanced, mixed tenure community. It should be emphasised that individual clusters of settlements for the provision of affordable more than 10 affordable units would not normally be considered appropriate on larger, private developer sites and, therefore, it is not considered justifiable for contrasting principles to be considered appropriate on exception housing to meet local needs which would not otherwise be allocated in the sites. development plan, is an exception to the The Council has proactively sought to introduce this policy into the Replacement Plan as a means of meeting policies for general housing provision. Such policies must be fully justified, setting very specific housing need in exceptional instances. The Plan seeks to prioritise delivery of affordable housing out the type of need and the kind of within the designated settlement boundaries in accordance with placemaking principles. None of the arguments development which fall within their terms. posed by the representor are considered sound justification to remove the 10 affordable unit limit proposed for The affordable housing provided on exception sites. The representor's proposal is therefore not supported. exception sites should meet the needs of local people in perpetuity. Sites must meet all the other criteria against which a housing development would be judged, such as the national sustainable placemaking outcomes. Affordable housing exception sites are not appropriate for market housing." Previously, however PPW10, at paragraph 4.2.34 confirmed that The provision of affordable housing exception sites must be considered to help meet identified requirements and ensure the viability of the local community. Where such policies are considered appropriate it should be made clear that the release of small housing sites within or adjoining existing settlements for the provision of affordable housing to meet local needs which would not otherwise be allocated in the development plan, is an exception to the policies for general housing provision. Such policies must be fully justified, setting out the type of need and the kind of development which fall within their terms.

The affordable housing provided on		
exception sites should meet the needs of		
local people in perpetuity. Sites must meet		
all the other criteria against which a		
-		
housing development would be judged.		
Affordable housing exception sites are not		
appropriate for market housing		
It is clear to note that all of paragraph		
4.2.34 of PPW 11 remains the same save		
for the removal of the word 'small'.		
Replacement Local Development Plan		
Policy COM5: Affordable Housing		
Exception Sites confirms a number of		
criteria which any proposal to development		
affordable housing exception sites outside		
of settlement boundaries need to meet.		
Criterion 2 of the policy states that: The		
proposal represents a logical extension to		
the existing settlement, does not exceed		
ten affordable dwellings and is of a scale		
appropriate to and in keeping with the		
character of the settlement The		
supporting text to the policy confirms at		
paragraph 5.3.33 that any such		
developments will still need to have		
reasonable access to local community		
services and facilities in nearby		
settlements and meet the specified criteria		
and other relevant policies of the LDP.		
Development will also need to respond to		
a pressing need identified by the LHMA		
and/or Local Housing Authority. In		
addition paragraph 5.3.34 states that the		
delivery of small affordable housing		
schemes adjoining existing settlements		
will be accepted where it can be clearly		
demonstrated that there is a pressing local		
need and this need cannot otherwise be		
accommodated within the respective		
settlement boundary. It continues that		
affordable Housing Exception Sites must		
comprise of no more than 10 units, which		
'is the appropriate size for a sustainable		
cluster of affordable housing. Sites larger		
than 10 units can become increasingly		
unconducive to the delivery and		
maintenance of balanced, mixed tenure		
communities'		



	Assessment Due to the recent changes in planning policy at the national level, as confirmed in paragraph 4.2.34 of PPW11, there is no longer a direct requirement within national policy for affordable housing exception sites to be 'small' in scale. Accordingly, criterion 2 of Policy COM5, and the refences within the supporting paragraphs to limit such schemes to an arbitrary number of 10 or less, is inconsistent with current national planning contained in PPW11. It therefore fails Test 1 and 2. We do not consider that exception sites should have an arbitrary cap on their size. There will still be a requirement for their acceptability to be assessed against all of the other test listed in Policy COM5. It is more critical that any site should have appropriate connections or linkages in terms of access on foot, or by cycling to services and facilitates or public transport options. Any site would need to meet the Placemaking Agenda and follow the site context analysis process as required by Welsh Government to meet the SHG funding requirements. On the basis of the above we request that the reference to any number of dwellings is removed from Policy COM5.		
	Rolled Over Housing Sites It is acknowledged that long term regeneration sites i.e. Coegnant Reclamation Site (COM1 (R1)), the Former Cooper Standard Site, Ewenny Road (COM1 (R2)) and Maesteg Washery (COM1 (R3)), will not be counted as part of the immediate housing land supply and are considered 'bonus sites'. However, the Council has assessed the allocations in the current LDP which have not come forward and determined that the following are suitable for allocation in the Replacement LDP: • SP2 (1) Porthcawl Waterfront 1,020 Units • COM1 (1) Parc Afon Ewenni 675 Units The total number of units to be delivered on rolled-over sites amounts to 1 695	Concerns regarding re- allocation of extant brownfield allocations	Two existing large scale brownfield regeneration sites have been proposed for re-a and Porthcawl Waterfront) within the Replacement LDP, both of which are conside of housing supply to enable delivery of the housing requirement. Before being 'rol Plan, both sites were subject to robust re-assessment of their sustainability, delivera in the same manner as all other candidate sites. In both cases, there has be circumstances to demonstrate the sites can be delivered over the Replacement LD the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial S Paper and Candidate Site Assessment). In addition to the two aforementioned 'rollover' sites incorporated within the New Hou of supply, there are also three brownfield regeneration allocations within the existing to re-allocate as Long-Term Regeneration Sites. These include Maesteg Washery, (Caerau) and the Former Cooper Standard Site, Ewenny Road (Maesteg). The reter a necessary degree of continuity with the first adopted LDP, which is essential regeneration strategy embodied within the Replacement LDP Vision. However, for in accordance with national policy, these Long-Term Regeneration Sites are not housing supply. The housing land supply will therefore not be dependent on their of fact that they require longer lead-in times, preparatory remediation-based enabling strategic master plans before they can come forward. Whilst Long-Term Regeneration in the plan to enable their delivery.
	on rolled-over sites amounts to 1,695 dwellings, and therefore forms a		in the plan to enable their delivery, they will not relied upon as contributing to the h also not be included in the windfall allowance. They are essentially 'bonus sites',

e-allocation (Parc Afon Ewenni idered deliverable components rolled forward' into the Deposit erability and viability credentials been a substantial change in LDP period, as indicated within I Strategy Options Background

Housing Allocations Component ing LDP that the Council intends ery, Coegnant Reclamation Site itention of such sites represents ial to implement the long-term for the avoidance of doubt, and ot included as a component of ir delivery, in recognition of the ing works and/or more detailed ration sites will still be allocated e housing requirement and will s', notwithstanding the fact that

substantial part of the overall planned housing requirement of 7,575 dwellings, equating to approximately 22%, or 30% of the proposed allocation of 5,661 dwellings. The Development Plans Manual (Edition 3) advises that "Allocations rolled forward from a previous plan will require careful justification for inclusion in a revised plan, aligning with PPW. There will need to be a substantial change in circumstances to demonstrate sites can be delivered and justify being included again. Clear evidence will be required that such sites can be delivered." It is considered that the deliverability of both the rolled over allocations at SP2 (1) Porthcawl Waterfront and COM1 (1) Parc Afon Ewenni is highly questionable – as set out below.	these significant brownfield sites are highly conducive to sustainable development ar of placemaking principles outlined in Planning Policy Wales. This is referenced with Background Paper, Spatial Options Background Paper, the Minimising the Loss of th (BMV) Agricultural Land Background Paper and the Candidate Site Assessment. The Council has clearly adopted a contrasting approach to extant regeneration proposed two existing large-scale brownfield regeneration sites for re-allocation tow requirement based on robust, site-specific evidence. This approach is in strict accords Plans Manual and the Council remains confident that there has been a substantial of demonstrate these two sites can be delivered, which justifies their inclusion in the Re
Implications Associated with Size of Housing Allocations and Timing of Delivery The Deposit LDP relies on a small number of large / very large housing sites to deliver its new housing allocations. There are no new sites allocated under the 100- unit threshold, and only 4 of the 10 allocations being below 675 units. Based on past problems associated with the delivery of a number of the larger sites within the adopted LDP (including Porthcawl Waterfront and Parc Afon Ewenni as discussed above for instance), and the accepted position that strategic/large sites typically take a longer time to come forward due to a number of factors (infrastructure requirements; complex land ownership; land remediation etc), it is questionable as to whether the plan is capable of delivering the required housing numbers over the plan period (even based on the 2014 household projections). By relying on large sites, this will restrict the timing of delivery until later in the plan period – it is likely to be the case that the vast majority of the housing allocations will	The Strategy seeks to deliver several large-scale Sustainable Urban Extensions, will sustainable communities that will incorporate a mix of complementary uses and delive infrastructure and/or provide new supporting infrastructure. Indeed, this latter factor is the school capacity issues across the County Borough and the need for new stratt enough in scale to support provision of a new primary school as a minimum. Sustain have been proposed for allocation where they can best support the Replacement I and can deliver mixed use development at a scale that will enhance communities. Identification of appropriate Sustainable Urban Extensions has been undertaken in Search Sequence and other requirements set out in Planning Policy Wales, as evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy O Housing Trajectory Background Paper and Minimising the Loss of BMV Agricultura The rationale for the proposed allocations within the Deposit Plan is clearly outli Assessment. Without exception, all proposed sites are supported by a large body evidence to demonstrate their deliverability. In terms of the proposal to place a greater reliance on smaller sites, several sites of the noted in the Plan-Wide Viability Appraisal, sites of several hundred units can pose this very reason. Therefore, the Deposit Plan has only proposed site allocations within the settlement and infrastructure improvements could be provided in support of the development. It is acknowledged that the representor has heavily referenced secondary research a before concluding "the delivery rates in the LDP are overly ambitious". However, it to the Local Planning Authority in respect of each proposed allocation. It is felt that, emphasis on past trends and secondary research, the representor has failed to context of the site specific evident to the Local Planning Authority in respect of each proposed allocation. It is felt that, emphasis on past trends and secondary research, the representor has failed to context of the site sprecific

and delivery of the full range within the Housing Trajectory f the Best and Most Versatile

on allocations and has only towards meeting the housing rdance with the Development al change in circumstances to Replacement LDP.

which is necessary to create iver improvements to existing or is particularly notable given rategic sites to be significant ainable Urban Extension sites at LDP Vision and Objectives

in accordance with the Site s documented in supporting y Options Background Paper, iral Land Background Paper. itlined in the Candidate Site ody of technical and viability

f this scale are far more likely ture problems and it is more ch sufficient critical mass. As their own viability issues for s where capacity was clearly nt and/or necessary facilities

h and past local delivery rates it can equally be argued that dence collected and submitted at, by placing such significant consider the enhanced site-

not start delivering units later in the plan deliverability requirements that are both enshrined in national planning policy and have been embedded into the period and therefore may not deliver their Replacement LDP process from the outset. full capacity over the plan period. There were four stages to assessing Candidate Sites, as detailed within the Candidate Site Assessment The typically lengthy timeframes Methodology: associated with the delivery of large housing sites is widely recognised and Stage 1: Potential to Support the LDP Strategy documented. A report undertaken by Stage 2: Detailed Site Assessment – Deliverability, Sustainability and Suitability Chamberlain Walker on behalf of Barratts Stage 3: Consultation with Appropriate Specific Consultation Bodies ('The Roll of Land Pipelines in the Stage 4: Sites for Inclusion in the Deposit LDP Housebuilding Development Process') in 2017 for instance identifies the following: Stage 2 of the Candidate Site Assessment involved scrutinising the sites that progressed from Stage 1 in greater detail. During Stage 2, sites were examined based on any specific issues they raised in terms of their • The Callcutt Review in 2006 estimated deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, that, across all site sizes, it took on environmental constraints and opportunities. In addition, there was an assessment of the policy context, together average 4.2 years to navigate the 'raw with the local geographical context, including known infrastructure issues. Site promoters were asked to prepare land' through the four development and submit a significant number of technical supporting studies to demonstrate each site's deliverability, viability, (A+B+C+D). The four phases sustainability and suitability. Sites without sufficient supporting evidence, did not progress to Stage 4 of the development phases are defined as Candidate Site Assessment (those sites to be included in the Deposit LDP). However, all sites that progressed follows: A) pre-planning application; (B) to Stage 4 were supported by a substantial body of work that demonstrated they were financially viable, capable planning application to planning of providing all necessary supporting infrastructure and deliverable over the plan period. This frontloading of permission; (C) planning permission to evidence ensured an appropriate range and choice of deliverable sites was proposed for allocation in sustainable start on site; and (D) under construction locations to ensure delivery of the plan's strategy. (build out) to completion. This rose to 5.8 vears for sites of 150 homes or more. The total housing provision, and spatial distribution thereof, has also been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close • A later Local Government Association dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of (LGA) study estimated that, across all site stakeholders at a Stakeholder Group Meeting. In accordance with the Development Plans Manual, the trajectory sizes, it took on average 1.7 years to was based on a cumulative analysis of realistic build rates, the capacity to deliver growth levels, phasing and navigate land through the 'post-planning timing of key sites, infrastructure requirements and delivery and viability work. As documented within the Housing permission' Phases (C+D). This rose to Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or 3.2 years for sites of 100 homes or more. the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting. In summary therefore, the representor's Data for 2017 from Barbour ABI indicates concerns are considered generic, overly pessimistic and fail to properly consider the site-specific evidence that 'post-planning permission' prepared in support of each allocation. development timescales (C+D) have increased markedly: on sites of 20 homes It is notable that the representor states, "there is no evidence whatsoever that applications on the 10 sites or more it now takes at least 4.0 years on allocated in the Deposit LDP will be determined anywhere near as quickly as the LPA considers (including preaverage from the grant of detailed application discussion, PAC and discharge of conditions), and the Council's assumptions in this regard run totally planning permission to site completion, counter to all the evidence (including Bridgend specific evidence) on lead-in times". However, equally, the compared to the earlier LGA estimates of representor has provided no site-specific evidence to substantiate these comments and justify that these 1.7 to 3.2 years. This shows that it is taking proposed allocations will not be determined as quickly as the LPA considers. This statement fails to recognise longer to deliver new housing in the 'postthe extent of site-specific evidence gathering and frontloading of the planning process and the extensive planning permission' Phases (C+D). discussions held with key stakeholders and the housing trajectory group. Added to the above is the 'Start to Finish' Moreover, an appropriate flexibility allowance (10%) has been embedded into the Deposit Plan and the basis for Second Edition (February 2020) Report which is clearly set out in the Housing Trajectory Background Paper. The flexibility allowance recognises the fact prepared by Lichfields which provides that there may be certain specific circumstances, unknown at the plan making stage, that delay the delivery of evidence in relation to lead-in times and sites, notwithstanding the robust frontloading of site delivery evidence. This is a large flexibility allowance, chosen delivery rates across a variety of sites in specifically to enable the Replacement LDP's housing requirement to remain comfortably deliverable in the event

	Nales and England. In total, 97 sites were	that a strategic site fails to come forward as anticipated at this point of plan prepar	
	assessed as part of this study, equivalent	allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable throug	•
t	o over 195,000 dwellings, providing real	a significant unforeseen scenario, such as non-delivery of a strategic site, should or	CCU
\	vorld benchmarks.		
		Since this representation was made, a further Housing Trajectory Stakeholder Grou	oup
	t is acknowledged that the Calcutt	2022. The representor was present at that meeting. At the latest Stakeholder Group	-
	Review, LGA study and Barbour ABI	regarding the completion figures, anticipated annual delivery rates for sites with p	
	eport refer to planning applications in	anticipated annual delivery rates for the proposed housing allocations. As such, there	
	England, and that there are limited	of disagreement on the completion figures or the timing and phasing of sites in the p	
	•		Jian
	examples of Welsh sites in the Lichfields	been approved by the Stakeholder Group.	
	eport (although two sites are within		
	Bridgend – Broadlands and Parc Derwen).		
	lowever, the fact that the reports focus on		
	English examples is considered		
	mmaterial in this context, particularly		
	given the lack of Welsh specific evidence.		
	This is because whilst the two planning		
5	systems in Wales and England may be		
(	diverging more and more, they are not so		
۱ N	astly different that when considering		
r	natters such as lead-in times, the		
F	evidence gathered in the above reports is		
r	not applicable. Indeed, given the Welsh		
	PAC and SAB requirements there are		
	additional processes and technical		
	approvals required in Wales that could		
	urther increase lead-in times.		
	Furthermore, a study undertaken by Arup		
	on behalf of the Welsh Government in		
	2013 identified a similar raft of issues		
	associated with bringing sites forward for		
	development, concluding that "The case		
	study research has indicated that there are		
	a number of common problems and		
	parriers within the existing planning		
	system that result in delays in the delivery		
	of planning decisions for housing. These		
	problems were replicated both across the		
	case study LPAs throughout Wales and in		
	he sample applications that were		
	examined. The problems within the system		
	seem to apply to both market and		
	affordable housing projects, with both		
	sectors suffering delays in achieving		
l k	blanning permission".		
-	The 'Start to Finish' Second Edition		
1 1	February 2020) Report assesses lead-in		

aration. With a 10% flexibility ghout the plan period even if occur.

oup meeting was held in May up, no objections were raised planning permission and the re are no outstanding matters plan period, all of which have approval period up to the first housing completion. Figure 4 from that Report (reproduced below) highlights the average timeframe from the validation of the first planning application to first completion across the 97 sites assessed.

It is noted from above that the quickest average timeframe from validation of a planning application to first completion on site of a scheme for 50-99 dwellings is 3.3 years. It could be argued that the 4.0 years for the 100-499 dwellings category should be used in this assessment given that there are no proposed allocations in the 50-99 category in the Deposit LPD, but the 50-99 category has been used for robustness. In reality the 102-140 category (which accounts for the 4 smallest allocations in the Deposit LDP) would be somewhere between 3.3 and 4.0, and nearer the 3.3 given that they are at the bottom of that cohort.

Based on the above, and assuming delivery of homes within Year 6 as set out in the draft policy (1st April 2023 – 31st March 2024), applications on the 4 smallest allocations would need to be submitted around January 2020 (already 18 months in the past) for any completions at the start of Year 6, or December 2020 for any completions towards the end of Year 6 (already 7 months in the past).

In terms of the 6 larger allocations, 4 of which are in the 500-999 dwellings category and 2 of which are in the 1,000-1,499 category (although as only just over 1,000 dwellings are scheduled to be delivered in the Plan period we have included all 6 in the 500-999 dwellings category for robustness), the lead-in times are 5.0 years. As such, applications would need to have been submitted around April 2018 to deliver any completions at the start of Year 6 or March 2019 to deliver any completions at the end of Year 6.



Of the 10 allocations above, no applications have been submitted on any of the sites. It is therefore highly unlikely that there will be any completions on the 6 largest allocations in Year 6 (as any planning submission is already at least 28 months 'late' based on the above). Even for any completions to occur in Year 6 on the other 4 allocations, applications would need to have been submitted circa 7 months ago in December 2020.

It is clear that the Start to Finish Report identifies average figures, and it is accepted that some sites may come forward quicker than the average 3.3 or 5.0 years above. Equally, however, they could take longer, and given that one site has already been allocated for 8 years and one site for 16 years, timely delivery is questionable.

The Calcutt Review, LGA study and ABI Barbour report paint a similar picture but the message is clear – the delivery rates in the LDP are overly ambitious.

Further to the above, we have undertaken a study of sites of over 100 homes allocated in the Bridgend LDP (adopted in 2013) to assess associated lead-in times. The results of this study are set out in Table 3.1 below. We have also included data from Parc Derwen given that it is listed in the Lichfields Report and all the basic data is available on the Council's website. The Broadlands development commenced delivery before the earliest JHLAS on the Council's website (2000) so this site is not included as the data is not readily available.

Based on the information contained in the above table, the average time taken from submission of the first planning application to the first completion is approx. 4.9 years (for the 9 sites above that have commenced the exact time of the first completion within that year is unknown as it is based on JHLAS data). The average



increases to approx. 5.5 years when the three sites that have not commenced are considered.

It is the case that four separate pieces of national research have been undertaken that demonstrate that lead-in times of sites (first submission to first completion) comparable in size to those allocated in the Deposit LDP are anywhere between circa 3 and 5 years.

The Bridgend specific research we have undertaken based on sites allocated within the current/adopted LDP, so benefitting from an adopted allocation (which is not the case for the Deposit allocations), shows that lead-in times are approx. 4.9 to 5.5 years.

Having reviewed the proposed ten housing allocations in the Deposit LDP as set out in COM1 and SP2 and through a thorough review of the Council's website, it has been identified that there are no planning applications submitted on any of the deposit allocations. We are also not aware of any of them being subject to PAC yet, albeit that information is not publicly available on the Council's website.

The LDP Background Paper 4: Housing Trajectory, identifies at Table 1 of Appendix 3 the Council's predicted housing trajectory and includes the "time lag to construction start in months". Three separate columns are included within this table covering 'pre-application discussions and PAC'; 'application determination'; and 'discharge of conditions'. The Council has allowed periods of between 6 weeks and 9 weeks for pre-application discussions and between 6 weeks and 8 weeks for PAC. Given the size of the sites, particularly the larger ones, these timeframes are completely unrealistic.

The Council consider that all applications are able to be determined within timeframe of between 10 and 16 weeks. However, all



applications will need to be determined at Committee, all will need Section 106 Agreements and some may require EIA. To consider that applications of this nature will be determined within, or even close to, statutory timeframes is fanciful in the extreme, particularly with such short preapplication stages. The timeframes also assume a single stage planning application submission (i.e. not outline consent followed by reserved matters).

Finally, the Council assumes that all precommencement conditions will be discharged within 8 weeks, and again the trajectory seems to assume that applications for discharge of conditions will follow immediately after consent is granted. Given the pressures which LPAs are currently under, it is considered that discharging pre commencement conditions on sites such as these within 8 weeks is unrealistic. Judicial Review periods have also not been taken into account. There also seems to be an assumption that each stage in the planning process will move straight into the next stage, which again is totally unrealistic.

There is no evidence whatsoever that applications on the 10 sites allocated in the Deposit LDP will be determined anywhere near as quickly as the LPA considers (including pre-application discussion, PAC and discharge of conditions), and the Council's assumptions in this regard run totally counter to all the evidence (including Bridgend specific evidence) on lead-in times. The trajectory is therefore not robust or sound.

Based on the more realistic timescales obtained from the evidence above, even if applications for all of the sites were submitted on the 1st August 2021 (as soon as the Deposit LDP consultation has closed, which is wholly unrealistic), based on the above national and Bridgend research, completions could not reasonably be expected until circa 2026.



This is Year 8/9 i.e. 2/3 years after the Council's predicted start date for completions on COM1 and SP2. If applications were submitted 1 month after the LDP is scheduled for adoption in April/May 2022 (to allow for PAC), then completions could not reasonably be expected until circa 2027, which is Year 9/10 i.e. 3/4 years after the Council's predicted start date for completions.		
The timing of the adoption of the replacement LDP is also a key contributory factor in terms of delivery rates as, at present, a number of the proposed allocated sites do not benefit from policy support for the principle of development, and as such any applications will be highly unlikely to be determined prior to adoption of the replacement LDP. Given that there are so few allocated sites, and a high proportion of them), then it is even more unlikely that any will be granted planning permission prior to adoption as they are more likely to be considered premature given their significant contributions to housing numbers.	Concerns regarding the adoption timescales and delays to the Delivery Agreement	The representor's concerns regarding the Delivery Agreement, and the associated delivery of homes are noted. However, since publication of the Deposit Plan, a Replace has been prepared and approved by Council on 17 <sup>th</sup> November 2021 and Welsh Gove 2021. This has prompted re-evaluation of Plan's proposed housing allocations, and the enable construction of a revised housing trajectory. The Council has been and conti to preparing a robust housing trajectory that demonstrates the timing and phasing of a is realistic and deliverable. The final selection of proposed sites is detailed within the C and Housing Trajectory Background Paper.
The first Bridgend LDP Delivery Agreement was approved in 2018 and scheduled adoption of the LDP for August/September 2021. A revised Delivery Agreement was agreed by the Welsh Government in September 2020 (10 months ago) and programmed the publication of the Deposit Plan for January to March 2021. The Deposit Plan consultation expires on the 27th July 2021, so only 10 months after the latest Delivery Agreement was adopted it is already 4 months behind programme.		
This is not a criticism of the Council, but an observation of how difficult and time- consuming plan preparation is. A pertinent example of this is that the Council's Strategic Transport Assessment has not been completed with the Deposit Plan being accompanied only by an Interim		

ated potential impacts on the lacement Delivery Agreement Government on 10<sup>th</sup> December and their timing and phasing, to pontinues to remain committed of all sites over the plan period be Candidate Site Assessment Note. Further, once published the Strategic Transport Assessment could easily require further review of the Deposit Plan and additional work.

It is therefore considered reasonable to add 4 months to the Delivery Agreement programme for Stages 5-8, therefore adoption of the plan could be circa September 2022.

It must be noted that this is a best-case scenario and is based on the current Delivery Agreement and scheduled adoption date. We have carried out additional research which illustrates the timescales for adoption of other LDPs in Wales (including Replacement LDPs), which clearly demonstrates that delays and deviations from timetables approved in Delivery Agreements are common.

On a number of occasions, LDP Delivery Agreements themselves have been revised but the data is often reported differently on Council websites and/or Delivery Agreements are not always available (so a consistent level of information is not available). We have therefore prepared the following table, with associated commentary to aid interpretation.

As part of this research, we have excluded the North Wales authorities given that Flintshire and Wrexham do not yet have LDPs. In adopted addition, Anglesey/Gwynedd and the National Park Authorities have been excluded as the former is a Joint LDP and the latter three deal only with the national park so they are not directly comparable and are subject to additional challenges. Sufficient data is not available on line for Carmarthenshire, Ceredigion, Pembrokeshire or Torfaen to be included.

We have not included an average delay because of the difference in available data. For example, Bridgend's original Delivery

Agreement is available online so the table above shows the delays from the outset. RCT's original Delivery Agreement is not available online, but it is clear from general references within LDP preparation documentation that the Delivery Agreement needed to be revised more than once. Vale of Glamorgan's LDP required substantial revisions because of a change in political administration.

There is no consistent reason for delays and the above is produced to highlight that it is evident is that LDPs are difficult and time consuming to prepare and delays seem almost inevitable.

As the Bridgend replacement LDP is already 4 months behind schedule (based on a Delivery Agreement that is only 10 months old), and that that Delivery Agreement has itself been subject to a revised timetable, the date of adoption of the replacement LDP of April/May 2022 is extremely ambitious.

Another piece of evidence that is put forward (in Table 3.3) is the date from submission of the LDP to Welsh Government through to adoption. The same LPAs as in Table 3.2 have been used for this exercise.

The average timeframe for the above LPAs from submission to adoption is 15.8 months. This includes a Replacement LDP (Merthyr Tydfil). Bridgend's Delivery Agreement suggests a period of 7-8 months, which is quicker than any LDP or Replacement LDP to date since the process commenced 15 years ago.

Taking the average of 15.8 months above, plus the 4-month delay that the Bridgend LDP Delivery Agreement is already subject to, suggests a not unreasonable adoption date of circa November/December 2023. Whilst this may be a negative view it is certainly not unrealistic given the above evidence.

Returning back to the lead-in times referenced earlier in these representations, should applications be submitted as soon as the LDP is adopted based on the above November/December 2023 date, then completions would not be expected until late 2028/early 2029, which is Year 11 in the plan. This would leave just 4 years to deliver the numbers required in the Plan, and would require unrealistic delivery rates on site to achieve these numbers.

It is acknowledged that the above evidence in relation to adoption delays for LDPs together with lead-in times for planning applications is a worst-case scenario for two different processes. It is also acknowledged that some sites may deliver completions in accordance with the predicted timeframes in COM1 and SP2. However, it is not wholly unreasonable that some sites might not deliver for a significant number of years beyond Year 6, and it seems almost inevitable that many will not deliver in Year 6.

This highlights the weakness and lack of robustness of relying on a small number of large allocations, as the Council is putting all of its eggs in not enough baskets.

All of the above therefore further calls into question the ability to deliver the number of homes identified within the Plan period (and jeopardises the plan's soundness accordingly).

It must be noted that in many of the emerging 'first round' LDP allocations in a number of Welsh LPAs over recent years, applicants often submitted applications on the basis of Deposit allocations and Council's, quite reasonably, did not determine those applications until the LDP was actually adopted. This approach clearly buys time and helps speed up delivery of emerging LDP allocations. However, given recent Ministerial Statements placing more emphasis on the

plan-led system in Wales, the disapplication of TAN1 and the lowering of the threshold for LPAs to have to refer residential applications that do not comply with the LDP to Welsh Government, there is no evidence that applicants will continue to submit applications outside [current LDP] settlement boundaries based on Deposit allocations. This is compounded by the fact that planning applications are requiring more and more detail to be submitted.

All of the above has resulted in developers being more reluctant to pursue so-called 'speculative' applications as the likelihood of success if the site is outside the settlement boundary and not in accordance with the Development Plan has been significantly reduced. This has in turn reduced the confidence in applicants submitting applications on sites outside settlement boundaries in advance of securing an LDP allocation as that is the clear advice from Welsh Ministers, including sites with Deposit allocations. The purpose of these representations is not to interrogate the planning merits of these decisions as it is clear that Welsh Ministers wish to focus on a plan-led system, but this does have a knock-on effect on LDP delivery rates as applicants are less likely to submit major applications on sites outside settlement boundaries but allocated in Deposit Plans.

Notwithstanding, as set out in paragraphs 3.16–3.18 above, the average timescale from the submission of the first application through to completions on site means that to deliver homes in Year 6 (2023-2024), applications would need to be submitted and would need to be well advanced through the formal system already, and this is not the case with any of the proposed allocations in the Deposit LDP.

The Deposit LDP is therefore fundamentally unsound as it does not allow for a range and choice of housing

sites to come forward as a	nd when they	I		
are required. In order for th				
considered sound, there				
flexibility in the event				
strategic/large sites do not d				
nor at the quantum anticipate				
through the allocation a num	5			
	which are			
deliverable and viable in the				
address the shortfall in I	2			
supply in the early part of the	, , ,			
None of the strategic hou	ising sites or			
allocations in COM1 are				
delivering any units until year	ar 6, and it is			
considered that this re	presents an			
unrealistic timeframe (as this	s would imply			
units coming forward in 202	23/24). Based			
on the research undertaken	,			
above, for sites to b				
completions in 2023/4 ther	e l			
would already need to				
submitted and the progress				
	determination,			
decision, discharge	of pre-			
commencement conditions,	•			
works, completions) would n	9			
advanced. The plan overe				
speed in which developm				
brought forward on strategic				
LDP strategy which concent	<b>e</b>			
sites potentially will not allow				
forward in a timely manner in	n response to			
market demands.				
Land at Ty Draw Farm there				
be allocated for residential de	•			
increase the prospect of	delivery of			
homes, including much need	ded affordable			
homes, in the immediate	e term. The			
delivery of residential develo	opment on the			
site would make a valuable of	contribution to			
the windfall figure of 1,06	60 homes as			
identified in Table 7 of the D				
	•			
Range and Mix of Homes				
In addition to units not co	ming forward Concerns t	e The representor's sta	atement is noted although is factually ina	accurate. The LHMA
within the early part of the pla			ographic and property market data to pr	
also the case that the Depo			s in accordance with Welsh Government (	
currently stands does not			s (e.g. tenure mix and house types) to be	

IA 2021 drew upon a range of ghts into the mechanics of the wed the type of need in different apolated over the Replacement

	adequate range of types and sizes of units to meet varied housing needs (in accordance with PPW 11 which states for instance that development plans must "ensure that all communities have access to a range of well-located and designed energy efficient market and affordable homes to meet their needs"). The over- reliance on the Porthcawl Waterfront Site for instance, which will comprise predominantly higher-density / flat based development, does not amount to the provision of a range and mix of new homes for families where there is clear demand for them, as well as the Council's aspiration to mitigate against Porthcawl's aging population profile.	units to meet varied housing needs	LDP period. The LHMA forms a core piece of baseline evidence to influence the growth within the Replacement LDP. The Replacement LDP seeks to maximise its contribution to well-being through Sur Good Design, in accordance with Planning Policy Wales. COM6 seeks to achieve the mixed, socially inclusive, sustainable communities through a range of house types a of residents at an efficient and appropriate density. Rather than specifying a numer the framework to make the most efficient use of land based on site-specific con appropriate balance of uses can be pursued in a manner that maximises the densit compromising the quality of the living conditions provided. Supporting paragraph 5.3 that, "in order to foster sustainable, mixed and balanced communities, the Counciprovide an appropriate mix of dwelling sizes and types to meet local housing ne evidence within the latest LHMA. A preponderance of larger dwelling types with four be avoided and developments must seek to provide a suitable range of housing the between different types of housing and tenures".
219	<ul> <li>COM3: On-Site Provision of Affordable Housing</li> <li>This policy relates to affordable housing. As well as setting a requirement for affordable housing to be delivered onsite and setting guidance on viability matters, the policy sets out the target affordable housing percentage for each Housing Market Area as well as for the various allocations. The approach taken is for a higher affordable housing contribution on allocations when compared to the Housing Market Area.</li> <li>Bridgend College has prepared a High Level Viability Assessment for the "Land East of Pencoed" site that it is promoting which demonstrates that the delivery of the site is viable with 20% affordable housing provision.</li> <li>Paragraph 5.108 of The Development Plans Manual Edition 3 (March 2020) states that:</li> <li>"It may be necessary to have separate targets for key sites if the evidence base suggests this is more appropriate."</li> </ul>		The rationale for the area-based and site-specific policies is clearly set out with Background Paper. Within any broad housing market area, there will inevitably be viability, the nuances of which can never be fully captured in an area-wide stu Development Plans Manual, "much more insight can be gained which can result in targets, as opposed to the broader area identified in the high level appraisal. The rather the site specific being a refinement of the high level appraisal" (WG, 2020, pa to the area-wide affordable housing requirements within COM3, there are also site- requirements. The former are based on the Plan-Wide Viability Assessment, the lattle viability testing, which has involved analysis of more specific costs, constraints and s faceted approach is paramount to ensure Council's aspirations for delivering high-qu both realistic and deliverable. This evidence has indicated that higher levels of supported on certain sites as detailed within COM3. The representor's proposal to se housing requirements for allocated sites as for the Housing Market Area that t considered unjustified and not supported.

e scale, type and location of

Sustainable Placemaking and these principles by enabling and sizes to meet the needs eric requirement, COM6 sets context, thereby ensuring an asity of developments without 5.3.39 also clearly references ncil will expect developers to needs, with reference to the bur or more bedrooms should g types to meet the needs of d to avoid a visual distinction

iples detailed within proposed d types to meet local housing to the sites development to anner and this will ensure an g needs.

ithin the Affordable Housing be pockets of higher or lower study. As outlined within the in refined affordable housing he two are not contradictory, bara 5.89). Hence, in addition re-specific affordable housing tter are based on site-specific l site requirements. This dualquality new communities are of affordable housing can be set the same target affordable t they sit within is therefore

	Whilst High Level Viability Assessments prepared by Bridgend College demonstrate that a 20% affordable requirement is viable, no justification is provided as to why there is a different target affordable housing requirement for allocated sites. Changes sought: Unless a justification is provided as to why a different target affordable housing requirement is in place for allocated sites compared to the Housing Market Areas that they sit within, then the same target affordable housing requirements should be set for allocated sites as for the Housing Market Area that they sit within.			
219	COM10: Provision of Outdoor Recreation Facilities Drawing on the standards contained within the Fields in Trust "Guidance for Outdoor Sport and Play" document, this policy sets out the amount of different forms of public open space that should be provided on development sites based on the size of the population derived from a development. The need for the provision of a range of high quality public open spaces is recognised by Bridgend College but it is essential that these standards are applied with a degree of flexibility and with consideration of existing provision nearby. For the "Land East of Pencoed" site, land on the western side of the A473 owned by Bridgend College is to be retained as playing pitches and therefore an alternative mix with less provision of playing pitches may be more suitable. It is therefore suggested that the policy is amended so that it reads as follows: <i>"Provision of a satisfactory standard of outdoor recreation space is required on all</i>	changes t sort to F COM10.	being Policy	

of outdoor recreation for public vering several Local Wellbeing healthy choice in a healthy elines and allotment standards indards detailed within COM10 within COM10 itself, "provision busing developments" and "the Sport and Children's Playspace benchmark standards set out in h, the proposal to alter COM10 Trust, is not supported.

	new housing developments. <del>based on</del> following standards:		
	<ol> <li>1) 1.2 hectares per 1,000 population for Playing Pitches;</li> <li>2) 1.6 hectares per 1,000 population for Other Outdoor Sports (non-pitch);</li> <li>3) 0.25 hectares per 1,000 population for Equipped/Designated Play Areas;</li> <li>4) 0.3 hectares per 1,000 population for Other Outdoor Provision;</li> <li>5) 0.2 hectares per 1,000 population for Allotment provision;</li> </ol>		
	The Fields in Trust standards provide a useful benchmark but the nature and type of provision will be informed by the findings of the latest Outdoor Sport and Children's Playspace Audit and Allotment Audit as well as the availability and proximity to existing outdoor recreation space. On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG."		
	Changes sought: revisions to wording of policy COM 10 as above.		
407	N/A	No changes proposed	Comments noted.
391	Land at Castle Meadows, Coity, Bridgend - (ref. 323.C1) On behalf of our client Llanmoor Developments Co Ltd, please find below comments in respect of the Deposit version of the Bridgend Replacement Local Development Plan (BRLDP), but also in the context of candidate site ref. 323.C1 – Land at Castle Meadows, Coity. The Preferred Strategy Approach to	Concerns regarding mix of sites, windfall allowance and reliance on strategic sites.	The Preferred Strategy identified a range of potential types of sites that could de Strategy. These included Regeneration Sites, Sustainable Urban Extensions, Ecc Local Settlement Sites. The Council has taken into account the full SA site asse Appendix G of the Sustainability Appraisal, to select an appropriate suite of prinfrastructure proposals to meet identified needs. Informed by this SA Report, the confirms and provides reasoned justification for the outcome of the site selection candidate site. The Deposit Plan has only proposed site allocations where capacity accommodate the respective level of growth within the settlement and/or necessar improvements could be provided in support of the development. The final selection accompanying justification, is provided in the Candidate Site Assessment.
	Housing Delivery The Preferred Strategy consultation document identified an approach which consisted of allocating a series of larger, medium and small sites to deliver the identified housing need. It was proposed that these would have been supported by		Identification of appropriate proposed allocations has been undertaken in accor Sequence and other requirements set out in Planning Policy Wales, as document the Plan. This includes the Candidate Site Assessment, Spatial Strategy Options Trajectory Background Paper and Minimising the Loss of BMV Agricultural La rationale for the proposed allocations within the Deposit Plan is clearly outlin Assessment.

deliver the Growth and Spatial Edge of Settlement Sites and assessment findings detailed in proposed site allocations and the Candidate Site Assessment tion process in respect of each city was clearly demonstrated to sary facilities and infrastructure ion of proposed allocations, and

cordance with the Site Search ented in supporting evidence to ns Background Paper, Housing Land Background Paper. The putlined in the Candidate Site

a higher than average allowance for windfall sites. The PS identified that sites of around 1000	All strategic sites key to the delivery of the plan have been subject to greater evidence their delivery, including schematic frameworks, phasing details, key transport requirements, design parameters, s106 requirements, infrastructure and costs. This degree of confidence that the sites included within the Deposit Plan are realistically d
homes could deliver the infrastructure needed to accommodate the population resulting from those sites. It then proposed	full plethora of associated development requirements, infrastructure provision ar necessary to deliver high-quality new communities. Moreover, an appropriate flexil been embedded into the Deposit Plan and the basis for which is clearly set out
that sites of 150 dwellings or less would also contribute towards housing delivery, but these were small enough so as not to result in a significant impact on local	Background Paper. The flexibility allowance recognises the fact that there may be cert unknown at the plan making stage, that delay the delivery of sites, notwithstanding the delivery evidence. This is a large flexibility allowance, chosen specifically to enabl housing requirement to remain comfortably deliverable in the event that a strategic si
infrastructure, except for some localised improvements. Finally, small extensions to settlement boundaries would provide	anticipated at this point of plan preparation. With a 10% flexibility allowance, the Ant (AABR) will remain deliverable throughout the plan period even if a significant unfor non-delivery of a strategic site, should occur. The trajectory was prepared initially the
opportunities for smaller sites to come forward.	the respective site-promoters, followed by effective collaboration and involvement wi at a Stakeholder Group Meeting. As documented within the Housing Trajectory Back no outstanding matters of disagreement on the completion figures or the timing and
Such an approach was generally supported by us at this stage, with a caveat that greater emphasis ought to be	period (including those sites with planning permission and new housing allocations) Stakeholder Group Meeting. As such, the total level of housing provision within appropriately with a flexibility allowance to ensure delivery of the housing requirement
placed on the small to medium size sites given their ability to deliver relatively quickly, often without large upfront capital	potential for non-delivery and unforeseen issues in accordance with the Developmen The windfall allowance is not considered higher than average. Edition 3 of the Development
investment, and can therefore make a significant cumulative contribution to overall annual housing completions.	stresses the importance of small and large site windfall rates as separate component states "reviewing windfall delivery rates for both small and large sites, over different t the consideration of a future extrapolation rate". The Manual also cautions against us
Thereby helping to supplement the increasing rates of housing delivery on large sites. Our position at this stage was	this purpose and suggests "the time period chosen should be sufficient to rule out an and be of a reasonable duration". Indeed, it is important for the future extrapolation ra balanced rate of completions to avoid being skewed by particularly high or low trends
that the Authority's proposal to allocate 'Edge of Settlement' was correct and should form a substantive proportion of the	year average over the whole existing LDP period (2006/07 to 2020/21) is considered purpose as this period encompasses the recession, the subsequent repercussions a economic recovery. This is especially given the fact that the Replacement LDP seeks
housing allowance. Deposit BRLDP Approach to Housing	the existing LDP's Regeneration-Led Strategy (along with some additional sustainab maintain similar settlement boundaries. An Urban Capacity Study (UCS, 2020) was p Deposit Plan to provide further analysis of the potential urban capacity of the County
Delivery Summary of the Approach The Deposit BRLDP's approach to	housing to evidence the expected small and windfall site allowance rate. This UCS is sufficient capacity within the proposed settlement boundaries to accommodate this p housing supply. It therefore demonstrates (in addition to past trends) that the small a
housing delivery does in many ways reflect that of the Preferred Strategy. Larger Strategic Sites are identified to deliver the	rate utilised in the Replacement LDP is both realistic and deliverable. It also serves a developers and SMEs who are seeking to identify potential development opportunities in the Replacement LDP. The representor's concerns are therefore unsubstantiated a
bulk of the housing need, with some medium size sites of 150 or less included. All such sites are identified as delivering units from Year 6 onwards.	Moreover, the housing trajectory will be reviewed as the plan progresses and as part framework of the Replacement LDP. Refer to the Housing Trajectory Background Pa
These are accompanied in Year 6 and onwards by some existing land bank	

(albeit dwindling numbers over the plan period), large windfall sites (a provision of

ence requirements to support rt corridors, critical access his process provides a high deliverable, considering the and placemaking principles exibility allowance (10%) has at in the Housing Trajectory ertain specific circumstances, the robust frontloading of site ble the Replacement LDP's site fails to come forward as nticipated Annual Build Rate nforeseen scenario, such as through close dialogue with with a range of stakeholders ackground Paper, there were d phasing of sites in the plan s) following conclusion of the hin the Deposit Plan is set ment, taking into account the ent Plans Manual.

elopment Plans Manual ents of housing supply and t time periods, will shape using abnormal trends for anomalies in specific years rate to be based on a ds. Therefore, the fifteened the most robust for this and the following years of eks to broadly continue with able growth) and also published alongside the ty Boroughs' settlements for identifies more than particular component of and windfall site allowance as a useful resource to ties not specifically allocated d and not supported. art of the monitoring Paper and UCS.

44 per annum) and small sites (provision of 62 per annum).

In the early stages (Years 1 to 5), the Plan identifies existing planning permissions as the only source of housing delivery and the trajectory acknowledges a 'dip' in delivery over these years. Delivery begins to increase again as the housing allocations come 'online' from year 6 onwards (see Table 3 below extracted from the Housing Trajectory background paper).

## Comments on the Approach – Large Strategic Sites

Many of the housing allocations within the emerging LDP, both strategic and nonstrategic are large and complex sites. These sites often involve multiple landowners with differing interest and reaching agreements on timescales with the LPA can be a protracted task. For example, there may be landownership which is made up of a number of different parties (e.g. a family) and they only agree things via a trust; each member may have different expectations and or interests and struggle to come to an agreement before even being able to agree a position with another party.

Issues around the delivery of larger sites have already been experienced by BCBC under the existing LDP. For example, Parc Derwen was allocated for 1,500 homes and was originally granted planning permission in outline in 2007 with the original submission having been made in 2000. It therefore took 7 years to gain outline planning permission before embarking on the RM and discharge of conditions. The development remains unfinished, with planning permission only recently having been granted for the various play areas on the site - some 20 years after the original planning application was submitted. In addition, one of the Council's proposed sites within the Deposit BRLDP, Parc Afon Ewenni was allocated within the adopted

LDP and identified as starting to deliver on



its 550 dwellings in 2011. We are now 10 years on from that point and not a single application has been submitted. There have been issues with ownership and site specific matters relating to contamination. Llanmoor Homes have been directly involved with the Land west of Maesteg Road, Tondu. The site has remained in the last two development plans with outline planning permission initially granted in 2004. Subsequent changes and further outline permissions have meant that the full allocation has yet to be delivered. The most recent reserved matters application submitted by Llanmoor for 405 dwellings, followed the outline application originally submitted in May 2016. The discharge of Outline and RM Conditions is ongoing, demonstrating it has taken over 5 years to secure an implementable consent on this large strategic site. The issues identified above are not only an issue for Bridgend, it is noted that Cardiff Council's approach in their adopted LDP was to allocate a number of large strategic sites in an attempt to deliver the required housing need. Cardiff are at the early stages of their Review, however, they recognise that their approach will need to change to ensure that the required number of completions in the early years of the plan can be delivered. Paragraphs 2.54 and 2.55 of Cardiff Council's LDP Review Report1 state: Although these rates are below targets set out in the AMR it is now evident that the Plan-led approach is now starting to successfully drive the delivery of new homes at a level not seen for the last 10 years. The 1,444 completions in 2018/19 (43% higher than 2017/18) contrast with the previous 9 years where completions averaged 725 units per annum, with no year above 1,000 units for this period. The data on housing delivery demonstrates the 'lag' between Plan adoption and homes being completed on new sites allocated in the Plan. Due to a combination of site assembly, legal and logistical factors experienced bv



landowners/developers along with the time required to secure the necessary planning and adoption consents, trajectories of delivery are slower than originally anticipated. This includes time spent securing the accompanying Section 106 Agreements which fully deliver the Council's aspirations as set out in the LDP. Overall, over the 13 years between 2006 and 2019 a total of 16,521 new dwellings were built in Cardiff which represents 40% of the overall dwelling requirement. This is also recognised on page 9 of Cardiff's 'Consultation Paper on Draft Vision, Issues and Objectives'2. It is noteworthy that the recognition of this within the document also acknowledges that this isn't just an issue for Cardiff's administrative area, but it is an issue across the UK. Cardiff's approach is to reflect the issues experienced in the first 10 years of their

experienced in the first 10 years of their plan and will involve a mixture of larger and smaller sites that can deliver housing at a more consistent level in the review of their plan.

Whilst it is recognised that Cardiff and Bridgend are different in terms of housing need, geography, population projections etc., the fact remains that larger strategic sites can be very slow in delivering the housing needed.

As highlighted above the approach adopted within the BCBC Deposit RLDP places a significant amount of emphasis on the larger sites, however, it does recognise that these would be delivered around Year 6 and beyond of the 15 year Plan. At Year 8 (2025 – 2026), the Trajectory indicates that the Strategic sites would be delivering 600+ homes. This is only 3 to 4 years away.

Many of these sites will require substantial work in putting together Environmental Impact Assessments which could take 6-12 months or more to pull together. After which an outline application would need to be submitted and approved. Based on the experience in Cardiff, this is a process which will take far longer than the statutory



determination period for a major application. Some would likely take up to 12 months to reach a resolution to grant planning permission before having to go through the process of signing a S106 Agreement; a process that can take 6 months or more. By which time we are already into Year 7 of the Plan with no reserved matters applications having been submitted. Based on the current trajectory, a year later, the Strategic sites would be delivering 600+ completions. It is noteworthy that in the first 10 year period of the Cardiff LDP only 40% of the expected housing from large strategic allocations were delivered. The reliance therefore within the BCBC Deposit RLDP

on the housing identified in year 6 and beyond being delivered in this period is highly questionable; particularly given we are now into year 4 of the Plan and the Plan has not yet been through its examination. Whilst some work may be going on in the background to prepare applications for these sites, no such applications have been submitted to-date.

Whilst the approach of including larger strategic sites is supported, it is considered that a more realistic timetable is utilised for their delivery against the trajectory.

## Comments on the Approach – Windfall Sites and Existing Permissions

The early years of the Plan and Housing Trajectory places significant reliance on existing planning permissions, with windfall sites beginning to make a contribution during Year 6. It is anticipated that some 440 dwellings would be delivered through this approach. This is a large number of housing that is unallocated and is subject to sites becoming available, market fluctuations and land availability. The approach taken by the Council of averaging out the completions over the

averaging out the completions over the last 15 years is understandable, however, the significant fluctuations in the delivery of



windfall sites is a concern particularly given the Welsh Government's Development Plan Manual's requirement to act on any shortfall where the underdelivery is identified over a two year period.

The below extract from the Housing Trajectory background paper demonstrates the fluctuations and therefore the uncertainty around delivery of such sites:

Whilst it is acknowledged that this includes a period of recession, even in postrecession times the numbers fluctuate from 98 in one year to 0 in another. Whilst in this particular example over a two year period of monitoring this would be above the 44 average for windfall sites, taking other years with a delivery of 0 and 32 would result in a significant under supply which could trigger the need to start reviewing the delivery of housing against the trajectory.

## Recommendation

It is noteworthy that within the Preferred Strategy emphasis was placed on the delivery of dwellings through a mixture of large, medium and smaller sites. Such an approach was supported but has not materialised within the Deposit Plan Bridgend County Borough Council where a significant emphasis has been placed on the larger strategic sites, along with only a small selection of medium sized sites. No allocations are made within the Plan for smaller sites of less than 100 that are capable of being delivered under a single full application rather than an outline followed by a Reserved Matters. Such sites are capable of being delivered within a short to medium timeframe and would support some of the medium sites to deliver the housing numbers whilst the larger sites are being taken through the protracted planning application process. A number of such proposals were put forward as part of the Candidate site submissions, including that at Croesty



Farm, Coity on behalf of Llammor Homes. Further discussion of this site's suitability, adherence to the overall Strategy and response to the reasons for not including it is provided below, however, this proposal would provide immediate delivery for the LDP on a site which is void of any significant constraint, has good access to active travel network, and is surrounded by built form. It is therefore considered that whilst the overall approach does have some merit, there are some grave concerns about the early years of the Plan and its ability to deliver on the numbers, given the delays that are inevitably going to occur for the larger strategic sites, along with the unknowns and fluctuations in the delivery of windfall sites. Such concerns would therefore indicate that the plan is un-sound under Test 3 – Delivery, in that there are question marks over the timing of the delivery of these sites along with the likely slippage in delivery of larger Strategic sites.				
adherence to the overall Strategy and response to the reasons for not including it is provided below, however, this proposal would provide immediate delivery for the LDP on a site which is void of any significant constraint, has good access to active travel network, and is surrounded by built form. It is therefore considered that whilst the overall approach does have some merit, there are some grave concerns about the early years of the Plan and its ability to deliver on the numbers, given the delays that are inevitably going to occur for the larger strategic sites, along with the unknowns and fluctuations in the delivery of windfall sites. Such concerns would therefore indicate that the plan is un-sound under Test 3 – Delivery, in that there are question marks over the timing of the delivery of these sites along with the lack of appropriate contingency to deal with the likely slippage in delivery of larger		Farm, Coity on behalf of Llanmoor Homes.		
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Strategic sites.				
		Strategic sites.		
	L			

Title:	Title: Do you have any comments to make on the employment strategy?			
ID	Comment	Summary of	Council response	
		changes being		
		sought/proposed		
82	No comment	No changes proposed	Comments noted.	
488	Where's the jobs for all the new people coming into Bridgend	Where's the jobs for all the new people coming into Bridgend	The Deposit Plan has been underpinned by the identification of the most appropriat and housing provision, all of which have been based upon well informed, evidence be need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferre Options). A range of growth scenarios across the whole Replacement LDP period discussed within the Strategic Growth Options Background Paper. This has con- Borough's demographic situation is likely to change from 2018-2033 and infor response for the Replacement LDP. As such the Replacement LDP identifies an ap to enable a balanced level of housing and employment provision that will achieve sus Over 30% of the County Borough's population is projected to be aged 60+ by 2033 growth across this age group, there is likely to be a broad reduction in local econo- does not facilitate sustainable levels of economic growth to offset this phenoment therefore seeks to deliver sustainable forms of growth that will attract and retain econ- within the County Borough. As justified within the Strategic Growth Options Backgroup	

riate scale of economic growth e based judgements regarding erred Strategy Strategic Growth eriod have been analysed and considered how the County formed the most appropriate appropriate plan requirement sustainable patterns of growth.

33. With absolute and relative nomic activity rates if the Plan enon. The Replacement LDP conomically active households round Paper, the Regeneration

			and Sustainable Growth Strategy is largely driven by households within the 35-44 projected to support an increase in people in workplace based employment ov accommodated through provision of up to 7,500 additional jobs.
			A positive employment land response is necessary to achieve an equilibrium betwere skilled labour force and job opportunities in order to stimulate the local to regional economic force Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix labour force boost alongside other employment trends including past take up of enced and the land best suited to meet that need over the plan period in the context and Technical Advice Note 23, justified further in the Employment Background Paper Policy ENT1 supports SP11 by allocating new employment land for development. F by safeguarding the employment function of existing business and employment site
516	"attract and retain economically active households" - in other words, bribe people with our money to come here and exploit us - instead of allowing us to be more economically active ourselves. Sometimes I think we'd all be better off if BCBC just packed up and left us alone to our own devises.	Concerns regarding employment	<ul> <li>of different sites to come forward.</li> <li>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 ide requirement to enable a balanced level of housing and employment provision th patterns of growth.</li> </ul>
			Over 30% of the County Borough's population is projected to be aged 60+ by 2033 growth across this age group, there is likely to be a broad reduction in local econor does not facilitate sustainable levels of economic growth to offset this phenomene therefore seeks to deliver sustainable forms of growth that will attract and retain econ within the County Borough. As justified within the Strategic Growth Options Backgrou and Sustainable Growth Strategy is largely driven by households within the 35-44 projected to support an increase in people in workplace based employment ov accommodated through provision of up to 7,500 additional jobs.
			A positive employment land response is necessary to achieve an equilibrium betwee skilled labour force and job opportunities in order to stimulate the local to regional eco Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix labour force boost alongside other employment trends including past take up of er based economic forecasts. The resulting evidence base has informed the scale and need and the land best suited to meet that need over the plan period in the contex and Technical Advice Note 23, justified further in the Employment Background Pape
			Policy ENT1 supports SP11 by allocating new employment land for development. F by safeguarding the employment function of existing business and employment site of different sites to come forward.
707	This page presents a picture of what could only be called Utopia. The second and fourth paragraphs - An impression is being given here that there is, or will be, a 'plethora' (an over supply) of 'employment	Concerns regarding employment	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 runderpinned by robust evidence to ensure that plans are effective and deliverable and as defined in national policy set out in Planning Policy Wales (PPW).

44 age group. This growth is over the Plan period, to be

tween new homes, a growing economy. The 2019 Economic ix 15) analysed this projected employment land and sector nd distribution of employment text of Planning Policy Wales oper, and set out in SP11.

Policy ENT2 supports SP11 ites. This will enable a range

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

33. With absolute and relative nomic activity rates if the Plan enon. The Replacement LDP conomically active households ound Paper, the Regeneration 44 age group. This growth is over the Plan period, to be

tween new homes, a growing economy. The 2019 Economic ix 15) analysed this projected employment land and sector nd distribution of employment text of Planning Policy Wales oper, and set out in SP11.

. Policy ENT2 supports SP11 sites. This will enable a range

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

	generating developments' already in existence but will not be utilised until BCBC		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
	chooses to do so thereby preventing existing unemployed people from having a job. Am I to understand that there're long lines of businesses just waiting to start up but they can't because the houses for their prospective employee's have not yet been		need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferre 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 infor response for the Replacement LDP. As such the Replacement LDP identifies an ap to enable a balanced level of housing and employment provision that will achieve susting the strateging of the response for the Replacement LDP.
	built? Really? I imagine we wouldn't need job centres if these employers were allowed to set up NOW - possibly in an existing industrial estate where there seem to be numerous unoccupied premises. As I understand this page, authorities are blocking companies from providing work until that authority decides and directs where the employer will set up and then wait		Over 30% of the County Borough's population is projected to be aged 60+ by 2033 growth across this age group, there is likely to be a broad reduction in local econor does not facilitate sustainable levels of economic growth to offset this phenomene therefore seeks to deliver sustainable forms of growth that will attract and retain econor within the County Borough. As justified within the Strategic Growth Options Backgrou and Sustainable Growth Strategy is largely driven by households within the 35-44 projected to support an increase in people in workplace based employment or accommodated through provision of up to 7,500 additional jobs.
	for the housing to be built! This doesn't come across as correct. I somehow don't think that present or future employers will accept being TOLD where they will set up business - they'll probably choose to go somewhere else - which would be to their advantage rather than be told they have to set up in a place that doesn't suit them. If, on the other hand, it is intended to imply that housing will be built first - somewhere- and then a prospective employer will be TOLD they will locate at that place, even if they		A positive employment land response is necessary to achieve an equilibrium betwe skilled labour force and job opportunities in order to stimulate the local to regional eco Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix labour force boost alongside other employment trends including past take up of et based economic forecasts. The resulting evidence base has informed the scale and need and the land best suited to meet that need over the plan period in the contex and Technical Advice Note 23, justified further in the Employment Background Pape Whilst it is beyond the scope of the LDP to guarantee that employers will come to the SP11 by allocating new employment land for development. Policy ENT2 supports employment function of existing business and employment sites. This will enable a
	regard it as an unsuitable location, I believe that employment plans will probably backfire.		come forward.
779	As previously mentioned, if Porthcawl can be designed to cater for the young professional, as well as providing services for tourist to enjoy, I think this would create an attractive proposition for Bridgend to draw businesses that want to invest in local people.	Porthcawl should be designed to cater for the young professional, as well as providing services for tourist to enjoy	Comments noted. In terms of employment, the imbalance and shortage of emplo acknowledged compared with other settlements within the County Borough, althoug of employment in the town will continue to be provided through planned growth in t tourism sectors.
847	No	No changes proposed.	Comments noted.
996	Taking already scarce parking will have a negative effect on local businesses in Porthcawl and provide minimal additional employment opportunities.	Concerns regarding parking in Porthcawl	Comments noted. In terms of car parking, it's acknowledged that a sound and rob critical to the success of the regeneration. The Council is currently preparing such a be set in the context of Planning Policy Wales, which states that a design-led appro parking should be taken, which ensures an appropriate level of car parking is integra dominate the development. It will also recognise that there are a limited number of demand is particularly high and that it would be unrealistic to provide for this den development. To do so would sterilise valuable development land to provide parking on approximately 10 days each year. Nevertheless, car parking as part of the plans for

iate scale of economic growth based judgements regarding red Strategy Strategic Growth riod have been analysed and considered how the County formed the most appropriate appropriate plan requirement sustainable patterns of growth.

33. With absolute and relative nomic activity rates if the Plan enon. The Replacement LDP conomically active households ound Paper, the Regeneration 44 age group. This growth is over the Plan period, to be

tween new homes, a growing economy. The 2019 Economic lix 15) analysed this projected employment land and sector nd distribution of employment text of Planning Policy Wales aper, and set out in SP11.

ne area, Policy ENT1 supports rts SP11 by safeguarding the e a range of different sites to

bloyment land in Porthcawl is ugh it is likely that the majority in the commercial, leisure and

obust parking strategy will be n a strategy. That strategy will proach to the provision of car rated in a way which does not of peak days each year when emand within the core of the ing that might only be needed for the proposed regeneration

		area will continue to be provided at the Hillsboro car park to the west of the regen parking could be introduced as part of the enhancement of the Eastern Promenade.
		The authority has a strong desire to facilitate and actively encourage a modal shi 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 Po as a boulevard where visitors and locals could arrive at, and depart from the regene The location of the bus terminus will enable access towards the waterfront and also t has also undertaken feasibility work to explore proposals to deliver a bus terr regeneration area. The bus terminus project is being brought forward in connection Metro Plus project and is seen as a key element of the wider regeneration plans.
if land is available ever how big or small if it meets PPG and can be utilised in some way to create new houses ,new business opportunities employment think it will be	If land is available of which meets planning policy quidance and can	Support noted. In terms of employment, Policy ENT1 supports SP11 by allocating development. Policy ENT2 supports SP11 by safeguarding the employment function employment sites. This will enable a range of different sites to come forward.
good for any area	be utilised to create new houses, new business opportunities ,employment will be good for any area	In terms of housing, an Urban Capacity Study (UCS) (See Appendix 39) has been analysis of the potential urban capacity of the County Borough's settlements for expected small and windfall site allowance rate. The UCS identifies more than su proposed settlement boundaries to accommodate this particular component of the h a useful resource to developers who are seeking to identify potential development of allocated in the Replacement LDP.
There is a severe shortage of affordable industrial land for SMEs to expand in the borough which is the result of the re- designation of industrial land such as the Brackla Industrial Estate for housing under the guise of 'mixed development'	Concerns relating to shortages of industrial land.	The Deposit Plan has been underpinned by the identification of the most appropriat 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: Preferre 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 infor response for the Replacement LDP. As such the Replacement LDP identifies an approx to enable a balanced level of housing and employment provision that will achieve sus Over 30% of the County Borough's population is projected to be aged 60+ by 2033 growth across this age group, there is likely to be a broad reduction in local econor does not facilitate sustainable levels of economic growth to offset this phenomen therefore seeks to deliver sustainable forms of growth that will attract and retain ecor within the County Borough. As justified within the Strategic Growth Options Backgrou and Sustainable Growth Strategy is largely driven by households within the 35-44 projected to support an increase in people in workplace-based employment ov accommodated through provision of up to 7,500 additional jobs.
		skilled labour force and job opportunities in order to stimulate the local to regional economic force Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix labour force boost alongside other employment trends including past take up of e based economic forecasts. The resulting evidence base has informed the scale and need and the land best suited to meet that need over the plan period in the contex and Technical Advice Note 23, justified further in the Employment Background Pape
	meets PPG and can be utilised in some way to create new houses ,new business opportunities ,employment ,think it will be good for any area There is a severe shortage of affordable industrial land for SMEs to expand in the borough which is the result of the re- designation of industrial land such as the Brackla Industrial Estate for housing under	meets PPG and can be utilised in some way to create new houses ,new business opportunities ,employment ,think it will be good for any areaof which meets planning policy guidance and can be utilised to create new houses, new business opportunities ,employment will be good for any areaThere is a severe shortage of affordable industrial land for SMEs to expand in the borough which is the result of the re- designation of industrial land such as the Brackla Industrial Estate for housing underConcerns relating to shortages of industrial land.

generation area. Some visitor le.

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

ing new employment land for ction of existing business and

In prepared of which provides for housing to evidence the sufficient capacity within the e housing supply. It serves as t opportunities not specifically

ate scale of economic growth based judgements regarding red Strategy Strategic Growth iod have been analysed and considered how the County formed the most appropriate appropriate plan requirement sustainable patterns of growth. 33. With absolute and relative nomic activity rates if the Plan enon. The Replacement LDP conomically active households ound Paper, the Regeneration 44 age group. This growth is over the Plan period, to be

tween new homes, a growing economy. The 2019 Economic ix 15) analysed this projected employment land and sector nd distribution of employment text of Planning Policy Wales oper, and set out in SP11.

			Policy ENT1 supports SP11 by allocating new employment land for development different types of businesses. Policy ENT2 supports SP11 by safeguarding the emp business and employment sites. This will enable a range of different sites to come for
			SP11 facilitates opportunities for economic growth by directing employment-generation appropriate and sustainable locations, supporting expansion of existing businesses alignment between housing and employment growth. This holistic employment lan hectares of new employment land to be brought forward and accommodate up to 7, Plan period.
			In terms of Brackla Industrial Estate, 7.7 hectares of vacant available employment from the existing LDP and will continue to be designated for employment purposes vas indicated in the Employment Background Paper.'
108 5	The proposed site between Laleston and bryntirion will only result in further green land being built on, in turn causing further congestion and traffic in the area.	Concerns relating to loss of green space and traffic.	The Deposit Plan has been underpinned through the identification of the most app growth and housing provision, all of which have been based upon well informed, e regarding need, demand and supply factors (See Appendix 42 – Background P Strategic Growth Options). A range of growth scenarios across the whole Replacer analysed and discussed within the Strategic Growth Options Background Paper. T County Borough's demographic situation is likely to change from 2018-2033 and inf response for the Replacement LDP. As such the Replacement LDP identifies an ap 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 (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 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. However, success in delivering development on brownfield land in other settlements (notable Gateway), there are limited further brownfield sites) are therefore required to implement housing in high need areas and ensure the County Borough's future housing require The Replacement LDP apportions sustainable growth towards settlements that alreadevelopment. As such, a Settlement Assessment has been undertaken (See A sustainable settlement hierarchy. Based upon the consideration of a comprefixed site appropriately directed towards the Main Settlements of B with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
			The plan preparation has involved the assessment of 171 sites, the vast majority of candidate site has been assessed against the criteria in the Candidate Site Assessment previously consulted upon (See Appendix 13 – Candidate Sites Assessment Rep detailed assessment, sites were examined based on any specific issues the deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepa technical supporting studies to demonstrate the site's deliverability, sustainability an detailed assessment, only those sites deemed appropriate were included for allocat

ent that caters for a range of nployment function of existing e forward.

ating development to the most es and ensuring strong spatial and strategy will allocate 71.7 7,500 additional jobs over the

nt land has been carried over within the Replacement LDP

ppropriate scale of economic evidence based judgements Paper 2: Preferred Strategy ement LDP period have been This has considered how the nformed 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 Nales and seeks to minimise ever, given the existing LDP's bly Bridgend and the Valleys aining. Additional viable and ement SP1, deliver affordable irements can be realised.

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

of which are greenfield. Each ment Methodology which was eport (2020)). During Stage 2 ney raised in terms of their essibility, physical character, bare and submit a number of and suitability. Proceeding this ration in the Deposit Plan.

		I	1
			As part of the proposed allocation of Land West of Bridgend, development will requirements including a range of placemaking principles and masterplan developm Policy PLA3 – Page 71). Green Infrastructure and Outdoor Recreation Facilities will in accordance with Policy COM10 and Outdoor Recreation Facilities and N Supplementary Planning Guidance. The proposed allocation will also be required to corridor between the site and Laleston to retain the separate identities and characte preventing coalescence.
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	No specific comments to make.	No changes	Comments noted
287	Support - please see covering letter submitted	No changes proposed - support	Comments noted
38	Support town centre regeneration and employment	None	Comments noted.
293	Brackla Industrial Estate is shown as an Employment Allocation under Policy ENT 1 and as a Protected Employment Site under Policy ENT2 for B1, B2 and B8 uses. Part of this allocation was previously submitted under Candidate Site Ref 293.C2 for residential / mixed use. The proposals for the site (referred to as Site A within the candidate site submission) have now changed with the land now being progressed for educational (being acquired by the Council) and discount retailer use. The emerging LDP policy should reflect the Council's aspirations for the site (being mixed educational / retail use). In terms of the proposed retail use, the current LDP allocation at the North East Brackla site includes 4,950sqm of net retail floorspace, which is yet to be delivered. This is apportioned as 4,500sqm net bulky comparison goods, together with a new local service centre of up to 450sqm net. As previously set out, PPW requires LPAs to consider de-allocation of under-utilised or under-performing sites for more efficient uses. In this respect, the current discount retail proposals at the site (which are unchanged since those set out within the candidate site submission) represent a more efficient use of the site whilst providing an offer more that better conforms with the		Proposal not supported. Brackla Industrial Estate was identified in the Economic Ev that would contribute to future employment land supply, hence the site is alloc employment land development of B1, B2 and B8 use classes. Whilst the representor alternative proposal would need to clearly justify the loss of employment land in a LDP policy framework.

will be subject to site-specific opment principles (See Deposit will be required to be delivered New Housing Development d to maintain a strategic green cter of these settlements whilst

Evidence Base Study as a site located within ENT1 for new tor's comments are noted, any accordance with the adopted site's context. A Retail Impact Assessment has been undertaken which concludes that: - Impacts associated with the proposal in the design years are low and represent no threat to the vitality and viability of the existing centres.

- The proposal represents no threat to investment on the basis of the impact and expenditure analysis. The level of impact to Bridgend Town Centre would not undermine the centres' performance or threaten future investment. This impact would also be diluted by the comparison goods turnover of the town centre, which would be largely unaffected.

- Impacts have been assessed against relevant national policy criteria, which found that they are not significant, making the policy compliant with both national and local retail guidance.

Accordingly, it is considered that the LDP allocation at Brackla Industrial Estate should take a more nuanced approach reflective of the current regeneration aspirations for the area. The allocation should not be for blanket B1, B2, B8 uses but should reflect the Council's aspirations for educational uses at the site and the discount retailer proposals which will assist in the area's regeneration. The land has long been allocated within the North East Brackla Regeneration Area. The Council's Economic Evidence Base Study (2019) (EEBS) identifies that the site has been marketed by Lambert Smith Hampton and would likely need to have come forward on a speculative basis to attract occupiers. The need for such facilities is questionable (as has been demonstrated by others responding to the RLDP consultation). The EEBS also identifies at Para 2.55 that the site would require some form of funding for the delivery of any employment use. This provides the context within which the current proposals (for education use being led by the Council and for discount retail use) should be considered. The regeneration benefits and need for the proposals is such that the LDP needs to be



location is noted, although is

nd distribution of employment et the need. In doing so, the and site allocations, including

of new employment land at Ty this would enable the delivery ereby the residential elements too early to conclude that the e to give the site more time to ecommended against limiting on of the site makes it more istrial uses within the B1 use g to future employment land

g publication of the WG 2018l and housing-led alternatives onsidered the workforce, jobs at on the amount of land the ed that "the economic impacts demographic data (the 2018ne short term by the flexibility allocated land, and in the mid uses to the 1,700 jobs are at did not consider it appropriate n order to contribute to future

tlined numerous reasons for ace (refer to Section 6 of the was needed for employment urrent position and the higher ow needed to meet the need, r allocated sites".

ENT1(11) and therefore, the d Paper.

399	allocated within numerous Development Plans. The site is suitable and available for allocation within the RLDP for residential development and will contribute to the overall soundness of the Plan. The proposals advanced by Jehu accord with the National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW and the residential development of the site is considered to be deliverable and viable. The site should accordingly be allocated within the RLDP for residential use or alternatively, as a minimum, be included within the settlement boundary as 'white land' enabling the market to dictate the most sustainable use for the site as a windfall development. Please contact us should you wish to discuss any element of these representations with SWLDL. Please also see additional information submitted. As part of the Candidate Site process, Land at Ty Draw Farm, Pyle, was put forward for inclusion in the replacement LDP as a housing allocation (Candidate Site Ref. 293.C1) at both Stage 1 (on behalf Jehu and South Wales Land Developments (in separate submissions)) and at Stage 2 (on behalf of Jehu). However, the site continues to be designated for employment use (B1, B2, B8) by Policy ENT1(11) and is identified on the Proposals Map of the Deposit Replacement LDP as an employment allocation. As set out within the Development Plans Manual (Edition 3) "The deposit plan is the plan the LPA considers is sound and able to be adopted". Further to a detailed review of the Deposit Replacement LDP, it is considered that the plan (as it currently stands) is both undeliverable and based on an unrobust evidence base, and therefore, the plan is found to be fundamentally 'unsound'. <u>Employment Land Considerations</u> BCBC Economic Evidence Base Update (2021)	De-allocate Ty Draw Farm, North Cornelly as an employment site and re-allocate as a residential site	While the representor has cited extensive marketing of the remaining 2.23ha site, th site has yet to be marketed to its full potential as more modest, yet accessible, service The site materially changed when the residential development was completed by context of a fifteen-year plan, only five years has passed since this time, and two ci influenced by the impacts of the global pandemic. It is therefore considered that the Evidence Base Study (EEBS, 2019) and Update (2021) are still entirely relevant, and site more time to come forward before concluding that it should be released as an eemployment site has not yet been readied for the market and the owner has r commitment to undertake the enabling works as required by the Section 106 Agreen is not supported. A full rebuttal is provided below. Refer also to the Employment Bac <u>Site Background and Existing Local Development Plan History</u> The representor has made numerous statements that the site has been allocated period of over 40 years'. However, the Council considers the remaining part of allocation) to now be a materially different prospect to the broader site referred to by history and current status of the site is summarised below for ease of reference. Ty Draw Farm, North Cornelly is a site adjacent to the M4, and was allocated by the Unitary Development Plan (UDP) as a Special Employment Site under Policy E6(5) was to protect and distinguish the site from other employment sites based on characteristics, particularly its peripheral yet prominent location adjacent to the cour the strategic road network. Previous UDP Policy E6(5) allocated the whole greenfield extended to 6.1ha in total.

the Council's view is that the riced employment opportunity. by the end of 2016/17. In the o of those years were heavily the findings of the Economic and it is reasonable to give the n employment allocation. The s not yet fulfilled the original ement. As such, this proposal Background Paper.

ed for employment use 'for a of the site (proposed for reby the representor. The actual

he previous adopted Bridgend (5). The purpose of this policy on its physical and locational puntryside, and its proximity to eld site for this purpose, which

ed that the submitted evidence . The <u>existing</u> LDP Inspector

The Authority's 'Economic Evidence Base	believed such new provision could be made without departing from the Plan's strate the amount of employment land in the submitted Plan exceeded that which is likely
Study' (2019) was updated by the	Plan period. The Inspector considered that such over-provision of employment land
'Economic Evidence Base Update' (2021),	term needs provided an opportunity for some employment land allocations to be div
as required to reflect the 2018-based	housing need.
household and population projections	
published in August 2020 (replacing the	On the 29 <sup>th</sup> January 2013, a report was presented to Council proposing that a number
previous 2014 based household	Farm, North Cornelly, could accommodate additional residential development to r
projections).	The change to Ty Draw Farm was justified on the basis that the site was formerly
	Government) but is now privately owned. In this regard, and at that time, there was
Before the 2021 Update is analysed it must	regeneration funding to facilitate the delivery of the site solely for employment purpos
first be pointed out that neither the 2019 or	It was acknowledged that development of the site would require considerable inve
2021 Economic Evidence Base Studies	an appropriate access due to the difficult geology and topography of the northern pa
properly assess the fact that the site has	it was considered unlikely that the site would come forward in the short to mediun
been allocated for employment for well over	purposes. Council therefore approved the proposed changes to the existing LDP
40 years, apart from one passing reference	Cornelly was allocated as a Regeneration and Mixed-Use Development Scl
to it being a 'long-standing' allocation. The	incorporating Strategic Employment development facilitated by the release of appro
report is a theoretical exercise and doesn't	
take into consideration what has actually	Hybrid Residential/Employment Planning Application
happened (or not!) on the site, and any party	
who looked at the history of the site could	The site was also the subject of a mixed-use planning application at the time (applic
not reasonably conclude that it has a good	This application proposed the facilitation of part of the site for employment purpose
prospect of employment use considering it	units. The Local Planning Authority acknowledged the lack of readily available emp
has been allocated since at least the 1970s.	the County Borough, although considered that this could be remedied by the rele
The history of the site was raised in	adopted and existing) LDP as a proposed mixed-use development. This would pro
representations at previous stages and is	units within the short term, whilst enabling the remaining part of the site for employn
referenced again below	Llowever in egreeing the eccentebility of this explication, it was considered important
Now domographic approxice have identified	However, in agreeing the acceptability of this application, it was considered important
New demographic scenarios have identified higher growth in the 20-44 years age bands	conditioned or appropriately tied to a legal agreement to ensure that the employme were implemented and not left vacant after construction of the residential development
in 2018/2019. It is understood that to	provision of serviced employment land ready for construction, ensure appropriate his
identify the economic consequences of the	and to ensure that the developer carried out any profiling or levelling of the en
new population projections, Experian were	necessary.
commissioned by Stantec to rerun their	
economic forecasting model rebased to the	Planning permission for the mixed-use development of land at Ty Draw Farm was gr
Edge 2018-based PG-short term migration	subject to a Section 106 agreement. This agreement required the developer to crea
scenario. Based upon the updated	part of the site to facilitate its development for employment use in accordance w
economic forecasting, the 2021 Economic	statement (to be submitted to and approved by the Local Planning Authority no late
Evidence Base Update Report concludes	of the occupation of the first dwelling on the site). Condition 23 of the Decision Not
that the uplift in population requires 2.8 ha	for the approval of the reserved matters in relation to the commercial use shall be
employment land per annum - the	Authority not later than the expiration of three years beginning with the date of the
implications of which are summarised:	January 2017). The proposal was submitted as a 'hybrid' application, with full planr
	residential part of the site and outline consent granted for the employment part to t
• "This balances with the available land (2	main estate road was required to be provided to enable a future developer to
ha plus the 0.8 ha buffer), meaning in	employment development on that part of the site as part of an approved reserved m
absolute terms there is no shortfall in	
provision. However, this position would	Later planning consents increased the number of residential units on the site to
mean no flexibility in the balance between	P/15/135/FUL and P/16/271/FUL refer). Persimmon Homes, who partnered with the
demand and supply, and absolutely no	Land Developments, to deliver the residential housing, confirmed that the first dwelli
	on 30 <sup>th</sup> June 2014. Therefore, in order to comply with the original Section 106 agree

tegy, pointing to the fact that y to be developed within the d against short- and mediumverted to meet the additional

er of sites, including Ty Draw meet the identified shortfall. / in public ownership (Welsh as no prospect of any public ses in the foreseeable future. estment, notably provision of part of the site. On this basis, m term for <u>employment only</u> P and Ty Draw Farm, North cheme under Policy PLA3, oximately 94 dwellings.

ication P/12/796/FUL refers). es enabled by 94 residential ployment land in the west of ease of this site in the (now rovide 94 additional dwelling ment purposes.

nt to ensure the consent was nent elements of the scheme ment. This was to secure the ighway access was provided mployment land as deemed

granted on 22<sup>nd</sup> January 2014 ate a plateau on the northern with a scheme and method er than 2 years from the date btice also stated, "application a made to the Local Planning this permission" (i.e. by 22<sup>nd</sup> aning consent granted for the the north. An access off the o access and complete the matters application.

106 dwellings (applications the site owner, South Wales ling on the site was occupied ement, the employment land

scope, certainly in the short term, for any losses in the existing stock or in the supply".

• "With demand and supply balancing, there is a lack of flexibility in the available supply, and two things are clear. Firstly, all of the sites allocated for employment use need to be retained, and secondly there is a need to look for opportunities to boost supply to provide some necessary flexibility, to allow for situations where existing allocations take longer than anticipated to come forward, or demand for employment land is stronger than anticipated".

The implications of the 2018-based projections on employment land are significant - as such, it is considered that the use of one model/methodology (Experian), as utilised in the 2021 Economic Evidence Base Update, does not present a robust evidence base upon which to found the designation of employment land over the replacement plan period. This is particularly important in light of the site's history as a long-standing and unsuccessful development plan employment roll-over site. In this regard, Welsh Government guidance ('Practice Guidance – Building an Economic Development: Evidence Base to Support a Local Development Plan') advises the following in regard to calculating future employment land requirements:

• "A dual approach is recommended where sufficient data is available, where forecasting models are used in conjunction with past completions to allow alternative outcomes to be compared. LPAs may also seek to develop multiple scenarios reflecting different approaches to growth and future uncertainty to enable a more balanced consideration of employment land requirements".

 "Neither past completions nor forecasting methodology is perfect, both can yield inaccurate results depending on the extent to which future uncertainty influences actual demand and supply".

re-profiling scheme was required to be submitted to the Council no later than 2 years from this date, which equated to 30<sup>th</sup> June 2016.

Subsequently, the Local Planning Authority received a request to revise the date for receipt of a re-profiling scheme (as required by the Section 106 agreement) from 2 years to 3 years from the date of the occupation of the first dwelling on site. The agent confirmed that the employment element had been actively marketed since the hybrid planning permission was granted in January 2014. However, it was felt that more work than originally envisioned may be required to provide a roadside frontage to aid visibility in addition to the levelling of the site. This was likely to include the removal of a 4m high roadside embankment and potential thinning of some of the trees fronting the site, which are both located on land owned by BCBC. Consideration of the acceptability of any work required in this regard would be subject to a planning application. The request to extend the timescale for submission of the re-profiling scheme was made in order to provide additional time to fully understand the work required in consultation with interested commercial parties. Members resolved to approve this Deed of Variation at Planning Committee on 9th June 2016 it was completed on 5th September 2017. The Local Planning Authority considered that such an extension was justifiable on the basis of the active marketing undertaken by the owner and the need to ensure that the right scheme was submitted for the site.

On 20<sup>th</sup> December 2016, the site owner also submitted a Section 73 application (P/16/994/RLX refers) to relax condition 23 of application P/12/796/FUL (to extend the period of time to submit reserved matters in relation to the commercial use for another 2 years from the date of this permission). As part of this application, the agent confirmed that the employment element had been actively marketed since the hybrid planning permission was granted in January 2014. However, the responses received from potential occupiers during that time indicated that more re-profiling work (than originally envisaged) would be required to provide a roadside frontage in order to make the site more attractive for employment uses. An extension of time to submit the reserved matters on the employment element of the site, to enable the plateau work to be undertaken, was therefore considered acceptable by the Local Planning Authority. Permission was granted on 10th February 2017 for Condition 23 to be relaxed. The condition imposed was "application for the approval of the reserved matters in relation to the commercial use shall be made to the Local Planning Authority not later than the expiration of two years beginning with the date of this permission" (i.e. 10<sup>th</sup> February 2019).

On 7<sup>th</sup> February 2019, the site owner submitted a further Section 73 application (P/19/92/RLX) to vary Condition 1 of Planning Permission P/16/994/RLX to extend the period of time to submit reserved matters in relation to the commercial use for another two years from the date of this permission. As part of this application, the agent again confirmed that the employment element had been actively marketed since the hybrid planning permission was granted in January 2014. The agent also referenced the fact that no re-profiling scheme had been submitted to the Council in accordance with the S106 Agreement that was later varied on 5<sup>th</sup> September 2017. Rather than pro-actively seeking to create a development plateau to help enable the employment land to be developed, the agent confirmed that, "despite its active marketing there has been no occupier interest in the site and therefore further consultation would be required with any interested parties to ensure that the form of any re-profiling scheme meets their specification".

Given the above, a further Deed of Variation was submitted to the Council alongside the latest Section 73 application to revise the date for the re-profiling scheme to be submitted to the Council from 3 years from the date of the occupation of the first dwelling on site to 7 years (i.e. 30<sup>th</sup> June 2021). Given the proposal to extend the specified time period, it was considered necessary for the applicant to enter into a Deed of Variation to the agreed Section 106 agreement, with the extension of time justified on the basis of the active marketing undertaken (the latest Deed of Variation was signed on 10<sup>th</sup> July 2020). A further extension of time to submit the reserved matters on the employment element of the site, to enable the plateau work to be undertaken, was again considered acceptable by the Local Planning Authority. Permission was granted on 10th July 2020 to vary Condition 1 of a planning permission P/16/994/RLX. The replacement condition imposed was "application for

The reliance upon one methodology brings into question the robustness of the economic evidence update.

It is considered that as the updated population projections have resulted in a lack of flexibility in the available supply of employment land (and the "higher need requirement has made the situation more acute, and more land, not less is now needed to meet the need"), the Authority essentially needs to look at the identification of suitable, viable and deliverable employment sites afresh, and not to simply rollover previous allocations, particularly in the instance of Ty Draw Farm given its history. This is in accordance with advice contained within the Development Plans Manual (Edition 3) which states in regard to Employment Allocations that "Before allocations in previous plans can be rolled forward, they need to be evidenced they can be delivered". The 2021 Update only looks specifically at two sites in addressing the additional need (i.e. the retention of Ty Draw Farm for employment, and the mid to long term enabling of the Ford Site). No new sites are considered. However, in light of the economic impacts of the increase in working age population identified in the updated Welsh Government demographic data, a fresh site search should be undertaken, rather than relying on the retention of undeliverable land at Ty Draw Farm (if the evidence base is to be considered robust, and the plan is to be found sound).

Employment Review Report Sutton Consulting (July 2021)

Sutton Consulting have been instructed (on behalf of Jehu) to undertake a review of the Authority's economic evidence base in support of these representations, and have prepared an Employment Review Report accordingly. The report prepared by Sutton Consulting is attached at Appendix A. In summary, the report concludes: the approval of the reserved matters in relation to the commercial use shall be made to the Local Planning Authority not later than the expiration of two years beginning with the date of this permission" (i.e. 10<sup>th</sup> July 2022).

Notwithstanding these developments, the site owner did not submit a re-profiling scheme to the Local Planning Authority within the timescales prescribed by the Deed of Variation (dated 10<sup>th</sup> July 2020). Equally, no reserved matters application was submitted in relation to the commercial element of the site. Hence, whilst the site has continued to be marketed since the original hybrid planning application was granted consent in January 2014, the site has been marketed without a development plateau on the remaining employment element (2.23ha) of Ty Draw Farm, North Cornelly. Lack of progress in this respect has inhibited the attractiveness of the site to employment generating occupiers, despite ongoing marketing by the owner.

# Current Development Opportunity

Whilst the representor has continually argued that "the site has been allocated for over 40 years and has not been taken up (for employment purposes)", the Council does not consider this statement to be strictly accurate. The remaining employment portion (2.23ha) of the site is now considered to be materially different to the entire greenfield site (6.1ha) that had been marketed unsuccessfully for development over this period.

The first material change is that the site is no longer owned by the Regeneration Investment Fund for Wales to which it was transferred from Welsh Government in late 2010. The site was sold as part of the Fund's portfolio of sites in March 2012 to South Wales Land Developments Ltd and is now privately owned. The sale to the private sector brought a new impetus to bring the site forward for development.

This impetus led to the second material change, the re-allocation of the site from a 100% employment site to a Regeneration and Mixed-Use Development Scheme within the <u>existing</u> adopted LDP (2006-2021). Planning consent was granted on 22<sup>nd</sup> January 2014 for a 'hybrid' application, including full planning consent for the residential part of the site to the south and outline consent for the employment part to the north. An access off the main estate road was required to be provided to enable a future developer to access and complete the employment development on that part of the site as part of an approved reserved matters application. The purpose of this allocation and later consent was to introduce an element of residential use to stimulate a serviced employment development (by providing access and services).

The first dwelling on the site was occupied on 30<sup>th</sup> June 2014 and the whole residential element of the site was complete by the end of 2016/17. However, the site owner did not submit a re-profiling scheme for the employment part of the site within 2 years from the date the first dwelling was occupied, which equated to 30<sup>th</sup> June 2016 (as required by the Section 106 agreement). Equally, the site owner did not submit an application for the approval of the reserved matters in relation to the commercial use within three years from the date of the original permission (i.e. by 22<sup>nd</sup> January 2017). This led to the third material change.

In order to provide additional time for the site owner to fully understand the work required in consultation with interested commercial parties, the timescale for submission of the re-profiling scheme was extended from 2 years to 3 years and then to 7 years from the date the first dwelling was occupied. The latest Deed of Variation was signed on 10<sup>th</sup> July 2020 to this effect. In addition, the timescale for the application for the approval of the reserved matters in relation to the commercial use has been extended twice. The latest Section 73 application (P/19/92/RLX) to vary Condition 1 of Planning Permission P/16/994/RLX was granted on 10<sup>th</sup> July 2020 and the application for the approval of the reserved matters in relation to the commercial use shall be made to the Local Planning Authority not later than the expiration of two years beginning with the date of this permission (i.e. 10<sup>th</sup> July 2022).

• A significant quantum of both office and industrial floorspace is available on the market, with the Ford engine plant to become available soon, alongside likely closures in the supply chain. There is limited evidence of speculative development in the stronger business environment of Bridgend however this is usually on plateaued development sites prepared by the public sector and supported by grant aid or structural funding.

• The subject site is constrained in terms of lack of profile and prominence whilst the sloping topography would require a substantial earthworks programme to bring the site forward for development. The site has been allocated for over 40 years and has not been taken up, in our view due to a combination of weak occupier demand and the broad viability concerns which stop new development in many places across Wales.

• The size of the site means it is no longer 'strategic' and any development of this site for more functional industrial uses is likely to conflict with the critical mass of residential property in the area.

Deliverability of Ty Draw Farm Site for Employment

Establishing the deliverability of proposed site allocations is an essential task for the LPA during the preparation stages of the LDP. The Development Plans Manual (Edition 3) specifically states that "The key objective an LPA should establish is whether a site promoter has a serious intention to develop the site and can do so within the timeframe of the plan. This links directly to the test of soundness, 'Will the plan deliver?''. The essential component of 'deliverability' has not been considered by the LPA in relation to Land at Ty Draw Farm.

The undeliverable nature of the employment land at Ty Draw Farm is evidenced by historic development plan

Considering all of these points, the remaining 2.23ha of employment land at Ty Draw Farm, North Cornelly is now considered to be a materially different development prospect to the original 6.1ha greenfield site marketed solely for employment used 'for over 40 years' as continually referenced by the representor.

Ultimately, the section 106 agreement that accompanied the original hybrid planning permission (P/12/796/FUL, that has since been varied twice) required a development plateau to be re-profiled in accordance with a scheme and method statement to be submitted an approved in writing by the Local Planning Authority. Although the owner has proactively sought to vary the deadline for doing so on two occasions, through two successive Deeds of Variation, no scheme has been proactively designed and submitted to progress with these levelling works. Whilst the owner has stated this is due to lack of market interest, the Council considers that commencement of such enabling works would stimulate market interest. For example, marketing of a levelled site with a new access would undoubtedly render the site a more attractive proposition for employment generating occupiers. The site owner's marketing to date has essentially been for a site that still requires levelling and provision of a development plateau. In order to properly test the market and seek to progress initial enquiries further, the Council considers that proactive investment in the aforementioned enabling works, as per the original hybrid planning consent, would enable the site to come forward for the employment use intended.

It has to be acknowledged that the Replacement LDP will cover a period up until 2033 and the site materially changed when the residential development was completed by the end of 2016/17. Refreshed marketing was undertaken accordingly. In the context of a fifteen year plan, only five years has passed since this time, and two of those years were heavily influenced by the impacts of the global pandemic. It is therefore considered that the findings of the Economic Evidence Base Study (EEBS) are still entirely relevant, and it is "reasonable to give the site more time to come forward before concluding that it should be released" (EEBS, 2019, para 6.44).

# EEBS 2019 and EEBS Update, 2021

This site background has been carefully considered as part of the Replacement LDP's evidence base. An EEBS was completed in 2019, which undertook an employment land review, calculated employment land requirements and considered both local and larger than local employment factors in the context of the LDP's growth strategy. The EEBS provides evidence-based recommendations on the scale and distribution of employment need, the land best suited to meet the need, plus related policies and site allocations.

The EEBS (2019) considered the history and status of Ty Draw Farm, North Cornelly, firstly recommending that the "while the site is accessible to the motorway and may attract high value uses, we don't think it sensible to limit the sites scope to only 'high value' – the location of the site makes it attractive for more 'normal demand'; including local offices and some lighter industrial uses within the B1 use class" (para 6.43). Given that the scale of the employment site has now been reduced by virtue of the completed residential development on the south of the site, the remaining employment land represents a more modest development opportunity. The Study was therefore clear that the site should not be limited to high value employment uses and should be allocated as part of the general employment land supply. The Replacement LDP has therefore proposed re-allocation of the site as an employment site rather than a strategic employment site.

The EEBS also concluded that, "as a new site, whereby the residential elements and enabling infrastructure has only recently been provided we think it would be too early to conclude that the site has no prospect of coming forward over a plan cycle" and "we think it reasonable to give the site more time to come forward before concluding that it should be released" (para. 6.44). This point is especially significant given that the site owner did not submit a re-profiling scheme to the Local Planning Authority within the timescales prescribed by the Section 106 Agreement (later varied) and has not yet submitted an application for the approval of the reserved matters in relation to the commercial use.

allocations. The site has been allocated	As such, while the representor has cited extensive marketing of the remaining 2.23
within the Development Plan for various	Cornelly, it is considered the site has never been marketed to its full potential, with co
types of employment uses since at least the	provide a development plateau. It is acknowledged that the impacts of the Covid-19 p
1970s (indeed Development Plans are not	delayed progress in this respect. However, in absence of this work being undertake
even available that show the land not	prior to marketing, the Council's view is that the site has yet to be marketed to its full
allocated for employment use). In summary	yet accessible, serviced employment opportunity.
the site has formed an employment	
allocation in the following plans:	A supplementary update to the EEBS was also undertaken in 2021 to consider the wo
	implications arising from the refreshed 2018-based projections together with impacts
Ogwr Borough Council Kenfig-Pyle Local	Plant closure in September 2020. In the context of the updated demographics,
Plan (which received a Certificate of	recommended continued retention of the site as an employment allocation for a r
Conformity in May 1985, stating that it	included: an aligned growth strategy (homes and jobs), no scope to deallocate s
conformed with the adopted County	available for employment use, a zero-vacancy rate in Pyle in 2019, a new access
Structure Plan at that time);	providing easy access to the A48/M4, and the potential allocation of a mixed-use st
Ogwr Borough Local Plan (adopted April	the east (Land East of Pyle). If allocated, this latter site will generate need for a sma
1995);	to cater for the smaller scale local servicing needs. Equally, if Land East of Pyle doe
Bridgend County Borough Council Unitary	Draw Farm would represent the only form of new employment supply in the locality. In
Development Plan 1996-2016; (UDP)	remain an important opportunity to meet the needs of and help to diversify the econ
(adopted May 2005) – 'Special Employment	the Bridgend County Borough.
Site';	
• Bridgend LDP (adopted 2013) – 'Strategic	The EEBS Update (2021) also raised two other important points, which are re-emph
Employment Site'.	the representor's submission. Firstly, it is notable that the representor has highlighted
Bridgend Deposit Replacement LDP (July	the critical mass of residential property in the area". This point is not accepted by
2021) – 'Employment Site'	rationale for the development was to provide residential development in the short
	remaining part of the site for employment purposes. As the EEBS Update (2021) site
In addition, a Section 78 appeal at the site	the promoter of the 2014 mixed use scheme considered the provision of enabling
in 2005 (APP/F6915/A/05/1175163)	encourage commercial interest in the site in the future" (para. 6.3) and provision of t
attached at Appendix B also referred to the	is likely to generate renewed interest over the lifetime of the Replacement LDP. More
planning history, stating in paragraph 12	the EEBS Update (2021), the remaining 2.23ha site "will attract relatively small scal
that "Prior to the acquisition of the site by	light industrial/office space that are compatible uses with residential and will have on
the Land Authority for Wales (LAW) in 1978,	large vehicles and the volumes will be comparatively low, and access in and out of
a letter was received from the Borough	(para. 6.3).
Planning Officer (Appendix 10 Document	
12) indicating on an informal basis that	Secondly, the representor also comments that the site lacks prominence due to a der
there was no objection in principle to	boundary with the A4229 that links to the A48. In response, and as stated within the E
residential development of the site".	this may have been a factor when the site was a lot larger and capable of accom
Paragraph 27 goes on to state that "the	entities, the site is now of modest scale (2.23 ha), which means that the type of office
site has been allocated and positively and	may come forward are more likely to service the local community, in respect of whi
actively marketed for employment	required is different. The new access road links the site to the new residential area t
development for over 25 years but has not	ground and more modest landscape buffer on the western flank means the site
been taken up. A sale board has been	prominence from School Terrace that links to the wider community of North Cornelly
maintained on or adjacent to the site since	many local light industrial sites that have far less prominence than this site will offer"
1979." This confirmed that the site has been	
allocated for employment use further back	Revised Projections and Forecast
than 1985 (to at least the 1970s), that it was	
marketed between 1979 and 2005 (and has	It is noted that the representor has cited issues with the "use of one model/methodological states and the states are stated as the states are states are states are stated as the states are states a
been since), and that the principle of	employment land requirements, whilst referencing the Development Plans Man
residential development was accepted in	develop multiple scenarios reflecting different approaches to growth. However, and co
1978, 43 years ago.	develop multiple scenarios reflecting unerent approaches to growth. However, and considered and evaluated before for
	LDP's growth strategy and employment land requirements. This is clearly explained

23ha at Ty Draw Farm, North completed levelling works to pandemic have undoubtedly aken in the first instance and ull potential as more modest,

workforce, jobs and economy cts of the Ford Manufacturing s, the EEBS Update (2021) a number of reasons. These e sites that are suitable and ss road (Cilgant Y Lein) now strategic site immediately to naller site like Ty Draw Farm oesn't come forward then Ty In either case, the site would onomy of the western part of

phasised here in response to ted the potential "conflict with y the Council as the original ort term, whilst enabling the states, "it is noteworthy that ling infrastructure could well of the road and access points preover, as also stated within cale light industrial or flexible only modest requirements for of the site can be separated"

dense woodland buffer on the EEBS Update (2021), "while mmodating bigger corporate ice/light industrial activity that which the type of prominence a to the south, and the rising site actually has reasonable elly beyond. We are aware of er" (para.6.3).

ology" in terms of calculating anual's recommendations to contrary to the representor's formulating the Replacement ined in the Strategic Growth It should be noted that in 2000 the site was subject to an application for residential use of the whole site comprising 150 dwellings. This application ran concurrent to the Bridgend UDP preparation process. Whilst the UDP Inspector stated that "it is eminently sensible for housing", the site was allocated within the Bridgend UDP for 'special' employment purposes.

The UDP Inspector's Report also contains the following commentary on the Ty Draw Farm site – which clearly establishes the fact that the site is not suitable for an employment allocation:

• "In my opinion, the site is closely related to established residential areas in the settlement and, if used for housing, would be well served by existing facilities, employment and public transport" (6.32.1). • "At the Kenfig Hill/Pyle Local Plan Inquiry in 1986, the Inspector concluded that the site would be equally suitable for housing or employment use, but that the potential of a site which enjoys exceptional access to the road and rail networks should not be wasted. He recommended that it should be allocated for special employment use. In the Ogwr Borough Local Plan, 1995, the site was allocated for B1 use, which should have widened its attractiveness to business users" (6.32.2).

• "Notwithstanding the Council's evidence that past marketing exercises could have been more intensive, there has been limited interest in this site for the last 20 years either for special employment or B1 uses, and it remains undeveloped. PPWales cautions against identifying quantities of land which cannot be taken up in the period of the Plan, and calls for realism in planning. I consider that the history of this site counts against its inclusion in the UDP for employment purposes" (6.32.3).

• "The south-east portion of the County Borough has been most successful in recent decades in attracting and developing industry and commerce. I consider that the factors accounting for those successes go Options Background Paper and the Employment Background Paper. These papers support and draw upon the evidence within the Demographic Analysis and Forecasts Report (2019), Demographics Update Addendum (2020), Economic Evidence Base Study (2019) and Economic Evidence Base Update (2021).

A suite of 2014-based scenarios and alternatives were initially analysed in combination with more recent data from Mid-Year Estimates and a broad range of historical demographic scenarios, with varying migration assumptions. This analysis informed development of three growth options (Low, Mid and High) at Preferred Strategy stage, selected on the basis of being representative of identified scenarios, reasonable in relation to the evidence base and sufficiently diverse to enable different strategic planning responses. Each option was evaluated to determine how far it correlates with the evidence base, how far it will deliver the key issues the plan is seeking to address and whether it would achieve alignment between housing and economic growth in a manner that minimises the need to commute. After detailed evaluation, the Mid Growth Option was initially justified as the most appropriate to achieve a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the region.

Since publication of the Preferred Strategy, WG published 2018-based population and household projections (in 2020), thereby updating the 2014-based equivalents. These new WG projections provide a refreshed baseline for the Replacement LDP's demographic evidence base, which were subsequently considered alongside a range of growth scenarios, including trend and housing-led alternatives. This was to ensure the Mid Growth Option, as justified at Preferred Strategy Stage, remained appropriate to underpin the Replacement LDP.

Ultimately, it was demonstrated that the refreshed PG-Short Term Scenario still supports a comparable level of dwelling growth as identified under the original Mid Growth Option. The overall scale of population and household change is also not significantly different in absolute terms. However, there is a projected change to level of employment that this population could support, due to a more youthful age structure. The higher growth in the younger adult age-groups is particularly important when considering the link between Bridgend's population change and the size and profile of its resident labour force. Hence, the latest projection estimates that a higher level of employment (+451 per annum) could be supported with dwelling provision similar in scale to the original Mid Growth Option, or up to 500 jobs per annum based on a revised Experian forecast.

The EEBS Update (2021) Study demonstrated that this proportionate increase in the working age population can be satisfactorily accommodated by the flexibility and margin built into the original employment land supply (71.7ha) identified at Preferred Strategy stage. Enabling re-development of the former Ford Manufacturing Plant (45ha) will provide additional flexibility, whilst simultaneously providing a means to replace the 1,700 jobs that have been lost and maximising a key economic opportunity located on one of the County Borough's premier industrial estates. As such, whilst the refreshed PG-Short Term Scenario does project a larger labour force within a comparable dwelling requirement, the Replacement LDP has capacity to respond positively should economic growth be triggered by the availability of this increase in labour supply.

Overall, the refreshed demographic evidence base does not warrant a fundamental departure from the growth levels underpinning the Preferred Strategy. The housing requirement of 505 dpa is still considered deliverable, realistic and positive to enable sustainable levels of growth across the County Borough. A more youthful age structure is now projected, which could generate up to 500 jobs per annum, although this uplift can be accommodated through the Replacement LDP's employment land supply. The representor's concerns about the robustness of the evidence base in this respect are therefore considered unfounded.

Employment Site Search

J37 alone is insufficient reason to persist with the Ty Draw allocation (6.3.2.7.). • "I recordude that it is eminently suitable for housing" (6.3.2.1.). • "I recommend that the site at Ty Draw Farm be allocated for housing" (6.3.2.1.). • To confirm, the site has been allocated for employment use within at lessit 4 concurrent Development less with an elssit 4 concurrent Development less with an elssit 4 socurrent Development LDP (up to 20.3.), the land will have been subject to an employment allocation for nearly 60 years. • The site was owned by the Welsh Government (LDP (up to 20.3.), the land will have been subject to an employment allocation for nearly 60 years. • The site is now in ownership of no suft Wales Land Developments LH by the Welsh Government (and former Welsh Development Agency) from 1578, until it wes disposed of by the Welsh Government (and former Welsh Development Agency) from 1578, until the wise is now in ownership of na 2012. The site is now in ownership of the Welsh Government and South Wales Land Developments Land the set have active angloyment use, but despite ongoing attent of 2013. If least the site (and a permissive planning policy enabling employment use. • The site sine course for any plant, but is stel (and a permissive planning policy enabling employment use. • The site sine Course for any plant, but is stel (and a permissive planning policy enabling employment use. • The site sine Course for any any plant, but is stel (and a permissive planning policy enabling employment use. • The site has been marketed consistently since December 2019 from Tetecher Morgan (attached at Appendix C and D) - but in summary: • The site has been marketed consistently since December 2019 from Tetecher Morgan (attached at Appendix C and D) - but in summary: • The site has been marketed consistently since December 2019 from Tetecher Morgan (attached at Appendix C and D) - but in summary: • Anarketing has courred via a variety of means, including: • A Arketing has courred via a variety of means, includi	beyond proximity to a motorway junction,	The representor has stated that "the Authority essentially needs to look at the iden
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<ul> <li>I' conclude that it is timely to review the future of this site and that it is eminently suitable for housing' (6.32, 12).</li> <li>The confirm, the site has been allocated for housing' (6.32, 12).</li> <li>To confirm, the site has been allocated for housing' (6.32, 12).</li> <li>To confirm, the site has been allocated for housing' (6.32, 12).</li> <li>To confirm, the site has been allocated for housing' (6.32, 12).</li> <li>To confirm, the site has been allocated for menyloyment use within the replacement LDP (the tases the 1970s. If the site is again reallocated for employment use within the replacement LDP (the 10.33), the land will have been subject to an employment allocation for nearly 60 years.</li> <li>The site was owned by the Weth Government (and former Welsh Development Agency) from 1978, until it was disposed of by the Weth Government and South Wales Land Developments Ltd. Both Development Agency from 1978, until it was disposed of by the Weth Government and Down in ownership of the widence base. Firstly, Welle Government use, but despite ongoing attempte to bring the site (and a permissive ployment use, but despite ongoing attempte to bring the site (and a permissive ployment use, but despite ongoing attempte to bring the site (and a permissive ployment use, but despite ongoing attempte to bring the site (and a permissive ployment use, but despite ongoing attempte to storward to remptoyment use. Secondly, the Ford Bridgend Manufacturing Plant closed in 1, 700 jobs. The EEBS Update that this proport the evidence base. Firstly, Welle Government and a bit howend the sub-star are contained within the letter of 3rd september 2019 from LSH and 5th November 2019 fr</li></ul>	•	
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<ul> <li>in 2012. The site is now in ownership of South Wales Land Developments Ltd. Both the Welsh Government and South Wales Land Developments have attempted to bring the site forward for employment use, but despite ongoing attempts to market the site (and a permissive planning policy enabling employment in its favour), the site has not delivered any employment use. The site's marketing history is lengthy, but most recently and of most relevance is the extensive marketing campaign Lambert Smith Hampton (LSH) have undertaken on this site since December 2013. Full details are contained within the letter of 3rd September 2019 from LSH and 5th November 2019 from Fletcher Morgan (attached at Appendix C and D) – but in summary:</li> <li>The site has been marketed consistently since December 2013</li> <li>Marketing has occurred via a variety of means, including:</li> <li>o A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> </ul>		Since publication of the Preferred Strategy, two fundamental changes occurred, whi
<ul> <li>South Wales Land Developments Ltd. Both the Welsh Government and South Wales Land Developments have attempted to bring the site forward for employment use, but despite ongoing attempts to market the site (and a permissive planning policy enabling employment in its favour), the site has not delivered any employment use.</li> <li>The site's marketing history is lengthy, but most recently and of most relevance is the extensive marketing campaign Lambert Smith Hampton (LSH) have undertaken on this site since December 2013. Full details are contained within the letter of 3rd September 2019 from LSH and 5th November 2019 from Fletcher Morgan (attached at Appendix C and D) – but in summary:</li> <li>The site has been marketed consistently since December 2013</li> <li>Marketing has occurred via a variety of means, including:</li> <li>O A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> </ul>		
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<ul> <li>extensive marketing campaign Lambert Smith Hampton (LSH) have undertaken on this site since December 2013. Full details are contained within the letter of 3rd September 2019 from LSH and 5th November 2019 from Fletcher Morgan (attached at Appendix C and D) – but in summary:</li> <li>The site has been marketed consistently since December 2013</li> <li>Marketing has occurred via a variety of means, including:</li> <li>A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> <li>extensive marketed consistent at the representor has overlooked the flexibility was identified at Preferred Strategy Stage, and the evident capacity to accomprise to approx.</li> </ul>	The site's marketing history is lengthy, but	local economy is not constrained from responding positively to the younger (work
<ul> <li>Smith Hampton (LSH) have undertaken on this site since December 2013. Full details are contained within the letter of 3rd September 2019 from LSH and 5th November 2019 from LSH and 5th November 2019 from Fletcher Morgan (attached at Appendix C and D) – but in summary:</li> <li>The site has been marketed consistently since December 2013</li> <li>Marketing has occurred via a variety of means, including: <ul> <li>A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> </ul> </li> </ul>		instigated through the Mid-Growth Option. However, this required retention of all
<ul> <li>this site since December 2013. Full details are contained within the letter of 3rd September 2019 from LSH and 5th November 2019 from LSH and 5th November 2019 from Fletcher Morgan (attached at Appendix C and D) – but in summary:</li> <li>The site has been marketed consistently since December 2013</li> <li>Marketing has occurred via a variety of means, including:</li> <li>A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> </ul>		
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<ul> <li>September 2019 from LSH and 5th November 2019 from Fletcher Morgan (attached at Appendix C and D) – but in summary:</li> <li>The site has been marketed consistently since December 2013</li> <li>Marketing has occurred via a variety of means, including:</li> <li>A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> </ul>		Therefore, in the mid to longer term, enabling re-development of the former Ford Mar
<ul> <li>November 2019 from Fletcher Morgan (attached at Appendix C and D) – but in summary:</li> <li>The site has been marketed consistently since December 2013</li> <li>Marketing has occurred via a variety of means, including:</li> <li>A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> </ul>		provide additional flexibility. This will simultaneously provide a means to replace the
<ul> <li>(attached at Appendix C and D) – but in summary:</li> <li>The site has been marketed consistently since December 2013</li> <li>Marketing has occurred via a variety of means, including:</li> <li>A trinque approach is required in this respect and it will be necessarily to enable not necessarily akin to the type and density of uses previously accommodated a greater degree of flexibility and choice to the employment land supply.</li> <li>Therefore, by implying the Council has simply 'rolled over' existing employment it is felt that the representor has overlooked this detailed evidence base. In additional considered", it is equally felt that the representor has overlooked the flexibility was identified at Preferred Strategy Stage, and the evident capacity to accommodated to approx. 30 local and</li> </ul>	•	lost and maximise a key economic opportunity located on one of the County Borough'
<ul> <li>Summary:</li> <li>The site has been marketed consistently since December 2013</li> <li>Marketing has occurred via a variety of means, including:</li> <li>A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> </ul>	5	A unique approach is required in this respect and it will be necessary to enable a flex
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<ul> <li>Marketing has occurred via a variety of means, including:         <ul> <li>A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> </ul> </li> <li>Marketing has occurred via a variety of means, including:         <ul> <li>A professionally designed A4 marketing brochure which were distributed to approx. 30 local and</li> </ul> </li> </ul>		
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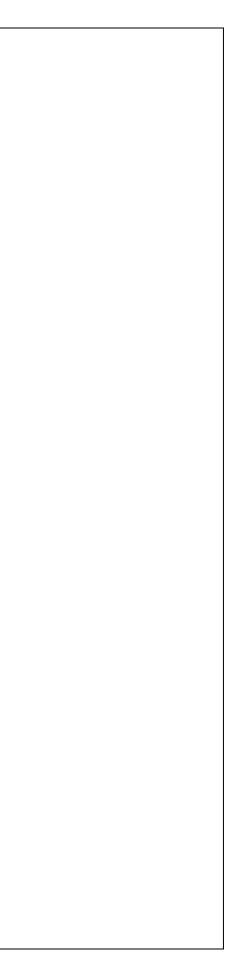
entification of suitable, viable cations". However, as clearly perty market for employment egic distribution space. This titative need assessment. As e is potential demand for new g plan. In relation to demand, consider doing so, and what market balance, we analyse e rental values that properties dence assessed the potential development sites that the ployment Background Paper, imum of 60ha of land to meet ch totalled to 71.7ha, to meet uggests (a positive margin of cy in terms of delivery, should rred Strategy adopted these uirements of a range of future ommuting and promote more

which warranted re-evaluation I household and population ations of the new projections of Plan needs to allocate for the meets to allocate for the term of the labour the EEBS (2019) remained e increase in the working age into the original employment on this basis will ensure the orking age) population profile all of the proposed allocated rcels within existing estates),

anufacturing Plant (45ha) will ne 1,700 jobs that have been h's premier industrial estates. lexible mix of economic uses, the site. This will also provide

es without due consideration, a, by stating "no new sites are the employment land supply, ate the projected boost to the

o Erection of a 16ft x 8ft marketing board at the site entrance o Listing on LSH and EG Propertylink websites o Press advertising in the Western Mail	
<ul> <li>There has been minimal concrete interest</li> <li>The LSH assessment confirms that the site is not suitable for A1 retail use given the lack of road frontage</li> <li>The LSH assessment confirms that undertaking the reprofiling works for the plateaus on a speculative basis will actually hinder, and not aid, the marketability of the site.</li> </ul>	
The site has been marketed consistently for nearly 8 years by LSH. This marketing has shown no concrete interest in developing the site for employment uses, or indeed retail uses. This marketing has been undertaken with the permissive planning policy framework which enables employment uses on site, and it has still been unsuccessful. The reasons for the lack of interest can be summarised as follows:	
<ul> <li>Development of the site by owner occupiers for B1 Employment use was not viable.</li> <li>Development appraisals produced a capital value lower than build cost. This was still the case even if the land value was assumed to be nil. This made development for owner occupation financially unviable without significant gap funding from the Public Sector.</li> </ul>	
<ul> <li>Speculative development of the site was not viable.</li> <li>A relative shortage of good quality-built employment stock has led to yield compression, a hardening of incentives and some rental growth. However speculative development remained marginal due to relatively thin occupier demand and low rates of take up.</li> </ul>	
• The site was not deemed prominent enough. Occupiers demanded a greater roadside presence or preferred to occupy	



mixed use developments at locations such as Bocam Park at Junction 35 of the M4 and Magden Park in Lintmisant. • Alternative sites are available. Atternative sites that are assilter to develop and had fewer physical constraints were available in alternative locations in the borough. The 2021 Stantac Updato Raport states that the new access road and access points provide easy access to the ad M4, but the borough is a start and access points provide easy access to the ad M4, but the 05.372 That "access to 10.37 adore is insufficient reason to persist with the Ty Draw allocation". The 2021 Stantac Update Raport also stated that "Now the road and access points have been delivered we may see renewed interest." Firstly, this is not evidence, this is pure speculation. Secondy, housing completions on this site started in 2015, when the new access roads and points were delivered. There has still been no interest in those 6 years. Planning Policy Wales 11 (February 2021) highlights at Paragraph 4.2.17 that "Maximising the use of suble prevously developed and/or underutilised land for housing development on geenfield states. For example, sites and allocations to file, industrial or retail purposes may be appropriate locations for housing. The de- allocation of under-used and underperforming sites must be considered underperforming ties must be considered through the development use four times, over a period of over 40 years, it is considered that it. Scienty front the site has been allocated for office, industrial or retail purposes: (i.e. the current		
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replacement LDP process) is fundamental to the plan achieving its employment strategy and securing an appropriate level of deliverable and viable employment land up to 2033. 2.19 It is clear that the Ty Draw Farm site is not realistically contributing to providing a choice of sites to more closely meet the requirements of different categories of employers as development has not been forthcoming, and as such it is clear that the allocation for employment use is simply inappropriate and not reflective of market conditions.

Despite the longstanding employment land designation on the site, it appears that the 'Economic Evidence Base Update' (2021) contains no assessment of the deliverability of the Ty Draw Farm site (there appears to be no assessment of deliverability within the main report and no appendices/supporting documents are indicated) - the robustness of the economic evidence base update is therefore challenged on this basis. It also does not appear that the 2021 Update considers the history of the allocation of the site, and that it is simply a theoretical exercise and the comment that now the roads and access points have been delivered on the adjacent residential site "may resulted in renewed interest" is purely speculative and not based on any evidence. Indeed, there has been no interest in the circa 6 years these access points have been in situ.

The 2019 Economic Evidence Base Study acknowledges weak demand in employment land at Ty Draw Farm – however, it sets out an argument for retaining the site as an employment allocation based on the residential elements of the site having been built out. Paragraph 6.44 of the 2019 study states that "As a new site, whereby the residential elements and enabling infrastructure has only recently been provided we think it would be too early to conclude that the site has no prospect of coming forward over a plan cycle. When originally allocated as a PLA3 site there was



no intention that it would be delivered so guickly (the land allocations made were for the whole plan period). So, while the market assessment points to general weak demand in the area, we think it reasonable to give the site more time to come forward before concluding that it should be released". This paragraph clearly states and acknowledges that the "market assessment points to general weak demand". The available evidence demonstrates that Ty Draw Farm is not deliverable as an employment allocation - no credible evidence has been put forward to challenge this finding. Whilst the market assessment demonstrates "weak demand", this evidence is discounted based on the unsubstantiated view that the site might come forward if 'given more time' (despite the fact that the site has already had at least over 40 years within which to come forward). The Authority's evidence for retaining the

site as an employment allocation is extremely weak, so much so that it is considered that the retention of Ty Draw Farm as an employment allocation will bring the plan's soundness into question i.e. the plan will fail to deliver adequate employment land over the plan period. This conclusion is reinforced by the advice contained within the Development Plans Manual (Edition 3) which states in regard to Employment Allocations that "Before allocations in previous plans can be rolled forward they need to be evidenced they can be delivered. If not, they should be deallocated. However, they could be retained and allocated in the plan for aspirational or regeneration purposes, but they should not be relied upon numerically to count towards the provision" (Page 132). The 2021 Evidence Base Update contains no evidence to suggest that the site can be delivered and the previous 2019 Evidence Base Study contains minimal evidence (i.e. give the site more time - with no substantive background). The Authority has put forward very limited (if any) actual evidence to demonstrate that a rolled-over allocation



	can be delivered, and in accordance with the Development Plans Manual the site should therefore be de-allocated for employment use.		
	<ul> <li>Based on experience of previous LDP Examinations, questions likely to be asked by the Inspector at the Examination in relation to the delivery of the plan's employment land objectives will likely include the following:</li> <li>Does each employment land allocation have a clear and adequate supporting rationale?</li> <li>What evidence demonstrates that each allocation is demonstrably deliverable?</li> <li>Based on the above, it is considered that the Ty Draw Farm allocation does not have a clear and adequate supporting rationale</li> </ul>		
	and has not been accompanied by evidence		
000	to demonstrate that it is deliverable.	De elle sete Tri	
399	Suitability of Land at Ty Draw Farm for Housing	Re-allocate Ty Draw Farm as a	The representor's objection to Ty Draw Farm being retained as an employment allo not supported by the Replacement LDP's evidence base.
	It has been demonstrated throughout the LDP preparation process that land at Ty Draw Farm is entirely suitable for a residential allocation ("eminently sensible for housing" as the UDP Inspector states). Submissions at Stage 1 and 2 of the candidate site process have provided detailed evidence and supporting survey information to demonstrate that: In accordance with the Development Plans Manual (March 2020), this submission aims to demonstrate that the following key principles are achievable in relation to the Candidate Site • The site is in a sustainable location and can be freed from all constraints; • The site is capable of being delivered and developed through the plan period; and • The development of the site is financially viable. In summary, very recently constructed residential development lies to the south	residential allocation or de- allocate it as an employment site and alter the status to 'white land' within the settlement boundary.	The Economic Evidence Base Study (EEBS, 2019) examined the required scale an need over the Replacement LDP Period and identified the land best suited to mee Study makes policy and site-based recommendations to inform emerging policies a recommendations regarding to Ty Draw Farm specifically. Planning consent was granted in 2014 for a mixed-use development with 2.23 ha of Draw Farm. The balance of the site was released for housing with the intention that th of the remaining employment land. The EEBS determined that, "as a new site, wher and enabling infrastructure has only recently been provided we think it would be to site has no prospect of coming forward over a plan cycle" and that "it is reasonable come forward before concluding that it should be released". However, the EEBS re the scope of the site to 'high value' uses and instead concluded that the location attractive for more 'normal demand', including local offices and some lighter indus class. Hence, the site was considered to have a realistic prospect of contributing supply. An Economic Evidence Base Update (2021) was subsequently conducted following based household and population projections and consideration of alternative trend at (refer to the Demographics Update Addendum (2020)). This refreshed analysis cor and economy implications of the new suite of projections along with any impact emerging Plan needs to allocate for employment uses. The 2021 Update concluded of the increase in working age population identified in the new Welsh Government of based PG-short term migration scenario) can be satisfactorily accommodated in the
	and more established residential development to the west of the site, and		and margin built into the EEBS. But this requires retention of all of the proposed al to longer term enabling the Ford Works site to be available for future employment u

allocation is noted, although is

and distribution of employment neet the need. In doing so, the s and site allocations, including

of new employment land at Ty at this would enable the delivery hereby the residential elements too early to conclude that the ble to give the site more time to recommended against limiting tion of the site makes it more dustrial uses within the B1 use ing to future employment land

ng publication of the WG 2018nd and housing-led alternatives considered the workforce, jobs act on the amount of land the ded that "the economic impacts at demographic data (the 2018the short term by the flexibility I allocated land, and in the mid at uses to the 1,700 jobs are at

there is no commercial development in the immediate surroundings, therefore the basic principle of residential development on this site is acceptable, and the proposed land use is compatible with surrounding land uses. In addition, given the proximity of residential dwellings to the south and west, B2 and B8 use classes may not be appropriate, further restricting the potential B class development to, largely, B1 only. Planning Policy Wales 11 states at Paragraph 4.2.17 that "Maximising the use of suitable previously developed and/or underutilised land for housing development can assist regeneration and at the same time relieve pressure for development on greenfield sites. For example, sites and allocations which are no longer likely to be needed for office, industrial or retail purposes may be appropriate locations for housing. The de-allocation of under-used and underperforming sites must be considered through the development plan process and could make a contribution to the housing supply if it can be demonstrated that they are deliverable for housing." The use of this underutilised land for housing development is therefore clearly in accordance with the Welsh Government's advice on the future use of underperforming sites. An overview of the submission documents previously provided to the Authority which provide a full and robust case for the suitability of the site for a housing allocation are summarised below:

LDP Candidate Site Drawing Booklet – Hammond Architectural

Hammond Architectural has produced an LDP Candidate Site Drawing Booklet to accompany this submission and to demonstrate deliverability. It has been informed by the technical studies that have been undertaken to date, as well as the extant consent. The Drawing Booklet contains a key Site Features and Constraints Plan; Development Framework least replaced the economic opportunity maximised". Ultimately, the 2021 Update did not consider it appropriate to release any of the employment sites previously recommended for re-allocation in order to contribute to future employment land supply.

The 2021 Update also re-considered the Ty Draw Farm site specifically and outlined numerous reasons for retaining this employment allocation as office, light industrial or hybrid flexible space (refer to Section 6 of the report). The 2021 Update summarised, "the EEBS in 2019 considered this site was needed for employment uses, and should not be released for other uses, and that remains our view. The current position and the higher need requirement has made the situation more acute, and more land, not less is now needed to meet the need, and the Borough cannot afford to lose neither sites in existing employment use nor allocated sites".

It is notable that the representor has stated, "very recently constructed residential development lies to the south and more established residential development to the west of the site, and there is no commercial development in the immediate surroundings, therefore the basic principle of residential development on this site is acceptable" (emphasis added). The emphasised part of this statement is not considered to be accurate. In practice, the site was the subject of a mixed-use planning application (P/12/796/FUL refers), which originally proposed the facilitation of part of the site for employment purposes enabled by residential development. Planning permission for the mixed-use development of land at Ty Draw Farm was granted on 22<sup>nd</sup> January 2014 subject to a Section 106 agreement. This agreement required the developer to create a plateau on the northern part of the site to facilitate its development for employment use in accordance with a scheme and method statement (to be submitted to and approved by the Local Planning Authority no later than 2 years from the date of the occupation of the first dwelling on the site). The proposal was submitted as a 'hybrid' application, with full planning consent granted for the residential part of the site and outline consent granted for the employment part to the north. An access off the main estate road was required to be provided to enable a future developer to access and complete the employment development on that part of the site as part of an approved reserved matters application. Ultimately, the section 106 agreement that accompanied the original hybrid planning permission (P/12/796/FUL, that has since been varied twice) required a development plateau to be re-profiled in accordance with a scheme and method statement to be submitted an approved in writing by the Local Planning Authority. Although the owner has proactively sought to vary the deadline for doing so on two occasions, through two successive Deeds of Variation, no scheme has been proactively designed and submitted to progress with these levelling works. Whilst the owner has stated this is due to lack of market interest, the Council considers that commencement of such enabling works would stimulate market interest. For example, marketing of a levelled site with vehicular access would undoubtedly render the site a more attractive proposition for employment generating occupiers. The site owner's marketing to date has essentially been for a site that still requires levelling and provision of a development plateau. In order to properly test the market and seek to progress initial enquiries further, the Council considers that proactive investment in the aforementioned enabling works, as per the original hybrid planning consent, would enable the site to come forward for employment uses. As such, and contrary to the representor's statement, the basic principle of residential development is not already considered acceptable and has not been established on the remaining 2.23ha of the site.

It is also notable that the representor has stated "given the proximity of residential dwellings to the south and west, B2 and B8 use classes may not be appropriate, further restricting the potential B class development to, largely, B1 only". The original rationale for the development was to provide residential development in the short term, whilst enabling the remaining part of the site for employment purposes. As the EEBS Update (2021) states, "it is noteworthy that the promoter of the 2014 mixed use scheme considered the provision of enabling infrastructure could well encourage commercial interest in the site in the future" (para. 6.3) and provision of the road and access points is likely to generate renewed interest over the lifetime of the Replacement LDP. Moreover, as also stated within the EEBS Update (2021), the remaining 2.23ha site "will attract relatively small scale light industrial or flexible light industrial/office space that are compatible uses with residential and will have

Plan; Concept Masterplan; and Key Parameter Plans (comprising Design Principles: Land Lise: Access & Meyemont:	only modest requirements for large vehicles and the volumes will be comparatively of the site can be separated" (para. 6.3).
Principles; Land Use; Access & Movement; Car Parking; and Phasing). The Key Parameter Plans have been prepared to spatially illustrate the Land Use strategy, high-level Design Principles, Movement and Access strategy and indicative Phasing Plan.	The representor's proposals to a) re-allocate the site for residential development, or be employment site and alter the status to 'white land' within the settlement boundary a aforementioned evidence base supports allocation of Ty Draw Farm as an employer Refer also to the Employment Background Paper. The final selection of propose documented within the Candidate Site Assessment and all of these sites are support evidence to demonstrate their deliverability.
Transport	
Asbri Transport Limited have produced a Transport Statement for up to around 66 residential units. Based on the TRICS analysis undertaken the proposed development could generate up to around 24 two-way vehicle trips to/from the surrounding local highway network in the AM and PM peak periods respectively and 254 daily vehicle trips. A comparative assessment has been made with the traffic generation forecast for the previously consented scheme of 94 dwellings and 6,000m <sup>2</sup> of B1 employment floor area and is evident that a 66 residential unit scheme would generate less peak hour and daily traffic. The site is sustainably located in the vicinity of several local amenities, schools and services in the nearby settlements of Pyle and North Cornelly.	
It is considered that this Transport Statement has demonstrated that there is no existing highway safety pattern or problem within the vicinity of the site which could be exacerbated by the proposed development. It has also demonstrated that sufficient multi-modal access can be achieved via an established and proposed network of active travel routes and existing public transport services within the vicinity of the site.	
Noise	
Hunter Acoustics, who were the acoustic consultants for the 2012 planning application, have provided an updated noise map. They conclude that road noise	

ly low, and access in and out

or b) de-allocate the site as an y are both not supported. The oyment site within ENT1(11). posed sites for housing are oported by a detailed body of levels at ground and first floor facades are indicated to be ≤60dB LAeq,16hr. This would fall under NEC B of TAN11. Standard thermal double glazing and background ventilation provided through trickle ventilators in open position is indicated to be sufficient to control internal noise intrusion to BS 8233:2014 'desirable' criteria. Garden noise levels are indicated to fall under the 55dB LAeq,16hr with standard 1.8m high close-board fences included, except for the northern plots where garden levels of 56dB LAeq,16hr are predicted. This excess is very marginal and should not be considered a significant constraint to development.

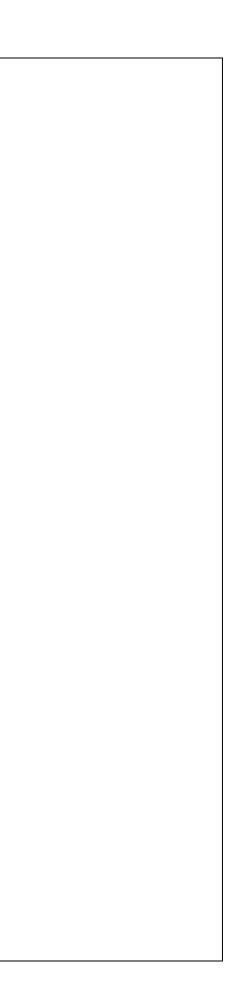
#### <u>Ecology</u>

A Preliminary Ecological Appraisal has been undertaken by Ecological Services Wales Ltd. The habitat within the site boundary is found to have low ecological value for wildlife due to the low potential for protected species or habitats within the site boundary. Whilst the site is found to have low ecological value, it still does have value for common flora and fauna. The adjacent woodland to the east of the site has moderate ecological value and careful consideration to this habitat must be given to ensure the development proposals do not inadvertently affect the woodland. The report makes a number of recommendations that should be adhered to reduce and/or avoid any negative impacts the development may have, and to provide biodiversity enhancements where possible.

### Trees

An Arboricultural Report has been produced by Arboricultural Technician Services Ltd. It concludes that the site has potential to accommodate development whilst retaining the trees of value. The significant trees on or adjacent to this site should be given due consideration in the development design process.

Drainage



A SUDS Viability Assessment has been undertaken by Quad Consult. It assesses the existing and proposed foul and surface water strategy, including an analysis of the SUDS standards that came into force in January 2019. It concludes that a SUDS compliant scheme can be accommodated within the site, and that the layout can be developed further once further engineering appraisals have been undertaken to quantify the exact volumes of attenuation required.

#### Agricultural Land Classification

The Welsh Government's predictive ALC map shows that the quality of agricultural land at the Site is classified mainly as Grade 2, with Subgrade 3a in the northeast. From a comprehensive desk-based assessment of published information on climate, geology, soils, plus a gradient assessment using detailed topographical information, the Askew assessment predicts that agricultural land quality:

(i) cannot be graded higher than Grade 2 due to an overriding climate limitation;

(ii) is likely to be limited by gradient to Subgrade 3b on strongly sloping land in the north eastern part of the site;

(iii) is likely to be limited by soil wetness to Subgrade 3a/3b in the north-western part of the site;

(iv) is likely to be limited by soil wetness in the southern half of the site to Grade 2.

The assessment concludes there is likely to be a lower proportion of Best and Most Versatile (BMV) agricultural land in ALC Grade 1, 2 or Subgrade 3a at the site than shown on the Welsh Government's Predictive ALC map online. As the site measures approximately 2.2 ha, and it is enclosed by non-agricultural land (woodland) and urban development, development of agricultural land at the site would not significantly harm agricultural interests in national planning policy, or development plan terms. It is also curious to note that the recent residential development



to the south of this site is classified as Grade 3a in the Welsh Government's predictive ALC map.

#### Geo-environmental

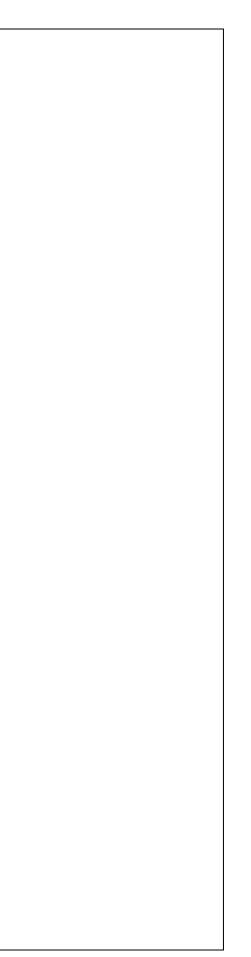
A Geo-environmental Site Investigation Report has been produced by Terra Firma. The site has been unoccupied field land throughout the years researched. No radon protection is required for new development on the investigation site. Soakaway tests were undertaken in a number of trial pits and negligible infiltration was recorded during the soakaway testing, over a period of over 2 hours. Based on these results together with the ground conditions encountered, it is considered that the use of traditional soakaways for storm water drainage will not be suitable for the proposed development.

All substances tested for were found to be present at concentrations below their respective human health threshold apart from one exceedance each of naphthalene and benzo(a)pyrene at the far north of the site in TP01 at 0.2m depth. Remedial measures will be required due to elevated concentrations of naphthalene and benzo(a)pyrene at TP01 at 0.2m depth. The affected soils are the dark brown organicrich gravelly clay.

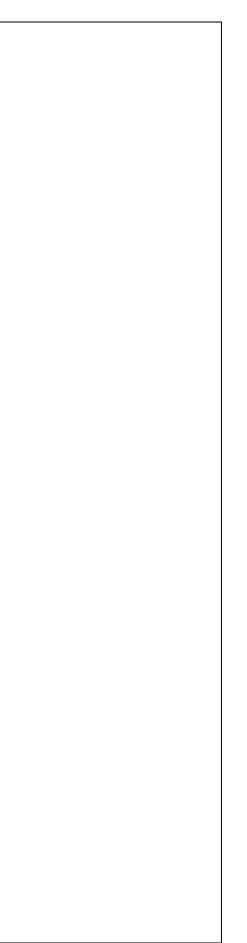
Due to the isolated contamination recorded at TP01 at 0.2m depth when compared to the concentrations recorded in other samples tested from around the site, it is considered likely that this area has either been affected by an off-site source during the construction of the adjacent road; or from fall-out from traffic. It is therefore recommended that further testing is undertaken around TP01, and alongside the road in an attempt to delimit the contamination. This could allow a 'hotspot' to be reasonably defined. The contaminated soil could then be removed from site and disposed of at a suitable landfill facility. Utilities



A Utilities Search has been undertaken by Cornerstone Projects Ltd. The Utilities	
Search does not identify any shortcomings,	
largely because of the recently constructed	
adjacent residential site.	
Viability	
A Viability Appraisal has been submitted by	
Jehu Group.	
An Alternative Option for the Site	
There is clearly a tension regarding the	
proposed best use of the site. All parties	
agree that the site lies in a location that is	
suitable for a development of this scale,	
within a Sustainable Growth Area.	
The Council considers that the site is not	
needed for residential development in the	
current Plan period but the site promoter	
considers that the delivery rates of housing	
completions is not realistic and as such the LDP will not deliver the required number of	
homes within the Plan period and therefore	
more residential sites (particularly smaller	
ones) are needed.	
The Council considers that the site is	
needed for employment use based on the	
updated report by Stantec in 2021 (although	
it is noted that the original report in 2019	
concluded that the site could be a reserve	
site). The Stantec report doesn't appear to	
have given appropriate weight to the long-	
standing allocation over at least 4	
development plans and over 40 years and	
is therefore a theoretical position and not	
one based on robust evidence. The site	
promoter's position is that the site has been	
allocated for over 40 years – it has been	
allocated in Development Plans for various types of employment uses since at least the	
1970s (indeed Development Plans are not	
even available that show the land not	
allocated for employment use), as	
confirmed by the Section 78 appeal at the	
site in 2005. The Sutton Consulting Report	
concludes that there is a substantial amount	
of available employment floorspace within	



the County Borough, in more commercially attractive areas.	
As such, a third alternative could be that the settlement boundary is extended and the site is not allocated for housing or residential use so that it would constitute white land within the settlement boundary. The inclusion within the settlement boundary and lack of a specific allocation will enable the market to dictate the future use of this land.	
The site promoter is a commercial developer therefore if a commercial opportunity arose that resulted in a larger capital receipt than a residential scheme, then it would make no commercial sense to not pursue that opportunity, and then the 'need' identified in the Stantec report would be realised.	
However, the reality is that a commercial use for this site is highly unlikely and therefore a residential development can act as a valuable windfall site to assist with the Council's housing delivery, including affordable homes.	
If not allocated for residential development within the replacement LDP, but instead just included in the settlement boundary as white land, then the site could make an important contribution to Bridgend's windfall allowance, which identifies a figure of 1,060 homes in Table 7 of the Deposit LDP.	
Conclusion	
The suite of technical studies demonstrate that the site is suitable for residential development, even without the benefit of the extant planning consent for 6,000 sqm of B1 employment, which is a material consideration.	
The site is located within the settlement boundary of North Cornelly, one of the LDP's 'Sustainable Growth Areas'. The Deposit LDP sets out that "Sustainable	



Growth Areas have been identified as areas most conducive to sustainable urban growth and appropriate urban expansion in a manner that will ensure the County Borough's housing requirements can be met. Sustainable Growth Areas have been be prioritised for growth based on their identified local housing need, accessibility, availability of amenities and employment provision in the context of their existing population bases and position in the settlement hierarchy."

The provision of housing on the Ty Draw Farm site clearly accords with the LDP's spatial strategy, and instead of the site remaining as a vacant employment allocation (as will be the case for nearly 60 years at the end of this Plan period in 2033), it is considered that this highly sustainable site presents an appropriate, viable, and deliverable (in the short term) housing allocation (which will assist the Authority in terms of delivering units within the early part of the plan period – something which the current plan will not do).

It has been demonstrated that Land at Ty Draw Farm is undeliverable as an employment allocation for a number of reasons, not least its extensive history for employment allocation (including different types of employment), in the control of both Welsh Government and a private developer, and with a supporting policy background. Its reallocation for employment land, which will take the life of the allocation to nearly 60 years by the end of the Plan period is not in accordance with the Development Plans Manual regarding rolled over allocations, and results in an unsound plan.

Finally, there is a third option for the site and that is simply to include it within the settlement boundary but not allocate it for residential or employment development, and then the market can dictate what is the most suitable use for the site, which it must be noted has been considered acceptable



	by a number of inspectors (development plans and Section 78 inspectors) for both residential and employment use.		
407	N/A	No changes proposed	Comments noted.
5	Overall Strategy The overall employment strategy, as set out in Draft Policy SP11 is broadly supported as it makes clear how the employment requirement will be met over the plan period and how this contributes to sustainable economic growth. The overall employment land strategy	t overall employment t strategy.	Comments noted. The employment strategy is considered flexible enough to rec of the market.
	should also recognise the changing demands of the market and the need for it to adapt accordingly. For example, since the start of the COVID-19 pandemic, we have seen higher levels of demand for fit for purpose logistics floorspace to accommodate the increased reliance on e- commerce and we expect that this will continue. Adaptability will be key in ensuring that the employment strategy is both flexible to accommodate alternative uses and resilient to proactively respond to changing market dynamics.		
	Draft Polices ENT2 and ENT3 Draft Policy ENT2 is concerned with protecting employment sites. It states that in order to protect the employment function of existing business and employment sites, development will be permitted on identified (existing and proposed) employment sites where they meet one of the three criteria: "a) it falls within Use Class B1, B2 or B8; b) in appropriate locations, it provides an ancillary facility or service that supports the primary employment use; or c) It is an appropriate waste management facility compatible with existing industrial and commercial activities" Waterton Industrial Estate is identified as an employment site within the Bridgend Sustainable Growth Area.	Amend the wording of ENT2 and ENT3 to enable a greater flexibility between uses	No action considered necessary - ENT2 protects sites for employment purposes to of employment land. Refer to the Economic Evidence Base Study and Employment careful management, fragmentation and pressure for alternative uses could resemployment land and premises to the detriment of the local and regional economies within the supporting text, ENT2 already allows for the development of ancillary serv the primary employment uses of sites. Such uses must be secondary in nature to They could include, for example, a small shop or trade counter selling produce from as snack bars, cafés, childcare facilities, gyms or training centres, which provide a set or users of the existing employment site. Therefore, the policy wording of ENT2 is of current form.

# ognise the changing demands

to maintain a sustainable level nt Background Paper. Without esult in a cumulative loss of nes. Nevertheless, as detailed ervices or facilities that support to the main employment use. rom the unit, or services such service to the local employees s considered appropriate in its

he Council is aware that there those falling within Class D2, d fitness/sports centres, which wever, in order to deliver the acement LDP prioritises town facilities and services to town ring intended users can easily non-B uses are permitted on wn centres, and the sequential Proposals for non-B uses will land or premises is surplus to Draft Policy ENT3 relates to proposed changes of use of allocated industrial and commercial land and premises from B-class uses to residential or other uses which will not be supported unless a number of criteria are met.

In the context of both Draft Policies ENT2 and ENT3, the need to ensure flexibility for the repurposing of sites, responding to market conditions and market signals, and consideration of securing viable and sustainable development will be critical in ensuring that large strategic sites like this site are able to be efficiently and effectively redeveloped. Restricting development on such sites to B Use Classes only may be counter productive in making the most efficient use of land and driving economic prosperity. Greater flexibility could be achieved through the inclusion of other employment generating uses including non-B-class uses. This would provide sufficient flexibility for the redevelopment of sites such as the former Ford Engine plant to reflect demand and changing market dynamics across all employment generating sectors and would drive economic growth through job retention and creation. Alternative employment generating uses should be supported where necessary to the growth and sustainability of the area, for example data centres, retail warehousing, trade counter, leisure etc. As such, these policies should be amended to enable a greater flexibility between uses.

Draft Policy ENT3 is a general employment policy that requires that properties / sites need to have been vacant for a period of at least 12 months and evidence provided that they have been marketed throughout that time for re-use at a fair market value prior to redevelopment being considered. Requiring a building to be vacant for at least 12 months could, in some cases, stifle the opportunities for alternative viable uses which could ensure that the site is in active use, particularly in fast moving markets. The issue of timing is particularly relevant in light of the UK Government's post-COVID, postthe requirements of the employment market. As such, Policy ENT3 is considered sufficiently flexible in its current form and introduction of further flexibility could otherwise result in developments that prejudice the use of the area for employment purposes. The representor's proposal is therefore not supported.

Brexit ambitions to Build Back Better, technology and climate change given changes in market sectors and the likelihood that future opportunities may differ from those pre-pandemic. Whilst demand is currently strong across the UK for new fit for purpose industrial / logistics floorspace constantly fluctuating market dynamics will not guarantee that employment sites will be suitable for such a use over the Plan period as site specific policies may specify otherwise.

The Draft Policy as currently worded requires all criteria to be met by the use of 'and' after criterion 4, which if interpreted as requiring all of the criteria, would never be able to be overcome as criteria 2 will not be applicable in most instances. The criteria is therefore restrictive and would make it challenging for land uses to respond to rapidly changing market conditions. Our suggested amendment to the policy is set out below (strikethrough is a suggested deletion; underline is suggested addition):

"The change of use of allocated industrial and commercial land and premises (including vacant land on employment sites) from Use Classes B1, B2 and B8 to residential uses will not be permitted unless site specific policies indicate otherwise. The change of use from Classes B1, B2 and B8 to other uses will also not be permitted unless it can be demonstrated that:

1) There are no other suitable sites available with reference to the retail hierarchy detailed within SP12 and other policies in this Plan; or

2) A building on an allocated employment site is required to accommodate the use; or
3) The property or site has been vacant for a period of at least 12 months and has been marketed throughout that time at a fair market value for the area and the condition of the property or site; or

4) The proposed new development will have no unacceptable impact on neighbouring existing occupiers or allocated uses; and or
5) The site is accessible by a choice of means of transport other than the car and

Draft Policy ENT5 Specifically, for Ford and its former Engine site, it is crucial that the potential for the site's redevelopment is sufficiently flexible to cover a range of uses ensuring that its redevelopment potential is future-proofed. Whilst it is rare that a 45ha brownfield employment site becomes available, it is yet to be determined whether interest would be for the whole site or in parcels, and to maintain market attractiveness non- traditional employment and enabling uses should be supported. It is vital that it addresses the key issues associated with the site and is sufficiently flexible to enable delivery of development as early in the plan period as possible. Draft Policy ENT5 as currently worded is vague and does not enable sufficient flexibility as it is currently unknown how the site could be viably brought forward and therefore the potential of the site needs to be future proofed to allow for changes in market dynamics and the sites' attractiveness. We consider that the policy should be more specific to identify the appropriate uses on the site to not constrain the sites potential. An intrusive environmental survey is underway on the site and the outcome of this will inform the sites viability / redevelopment. This and likely associated costs may therefore affect the types of uses that could viably come forward, and as such the policy should allow for alternative uses as alluded to in the supporting text. The supporting text to the policy is positive and references the need for alternative uses as alluded to in the supporting text. The supporting text to the policy is positive and references the need for alternative uses as alluded to in the supporting text. The supporting text to the policy is positive and references the need for alternative uses as alluded to in the supporting text. The supporting text to the policy wording text to have weight and ensure this is carried forward to enable development to viably come forward in light of market demand at any particular given time, it should be	No action considered necessarythe policy wording of ENT5 is considered flexible The supporting text clarifies 'ENT5 recognises that a unique approach is required in necessary to enable a flexible mix of economic uses, not necessarily akin to the previously accommodated on the site'. The representor has simultaneously requested more specific policy wording 'to ident the site to not constrain the sites potential'. However, and contrary to the represent of an SPG is considered the optimal means of providing more specific planning guid type and mix of uses. The Council remains committed to prioritising the re-developm as a key economic opportunity and will work collaboratively with Welsh Governme secure the best outcome for Bridgend. In terms of the site's proximity to a Site of Importance for Nature Conservation (SINC policies are cross-cutting in their nature and should be read as a whole. In order for taken towards nature conservation and/or areas of scientific interest in the County SP17 and provides a second tier of protection above that afforded by national policy." those sites defined in the LDP as being of regional or local importance. The regionally identified in DNP5 (which include all designated Local Nature Reserves, SINCs, Important Geodiversity Sites) are important to biodiversity and the conservation of scie Borough. Development within or adjacent to a SINC must be compatible with the natu interest of the area in accordance with DNP5. As such, no further amendments necessary in this respect.

le enough in its current form. I in this respect and it will be he type and density of uses

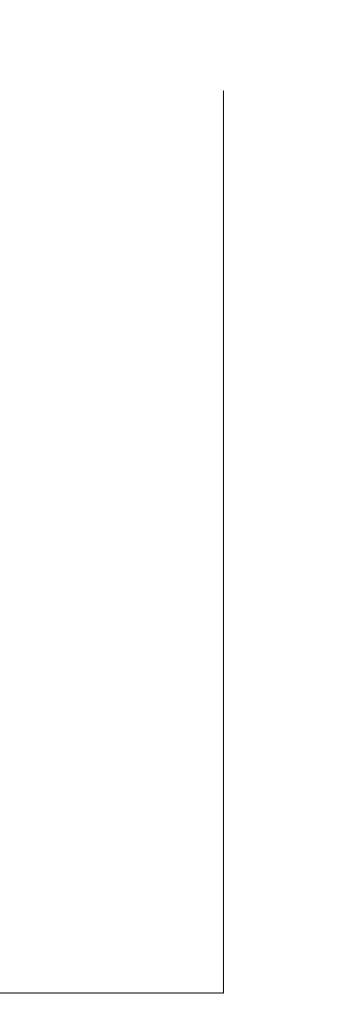
entify the appropriate uses on ntor's statement, progression juidance on the exact nature, oment of the former Ford Site ment and the landowners to

INC), the Replacement LDP's r for a holistic approach to be nty Borough, DNP5 builds on ey. This is necessary to protect ally and locally important sites Cs, and identified Regionally scientific interest in the County ature conservation or scientific ents to ENT5 are considered suggested deletion, underline is suggested addition):

"The Council will prioritise the redevelopment of the former Ford Site as a key economic opportunity and will work collaboratively with Welsh Government and the landowners to secure the best outcome for Bridgend, to support future jobs whilst seeking to replace the jobs that have been lost. The former Ford Site constitutes a pivotal economic land allocation within the successful Waterton Industrial Estate and will should be promoted brought forward as a means of economic stimulus for Bridgend County Borough and the wider regions in the first instance. However, given the past use of the site and the expected challenge around extensive enabling works, a mix of uses would be supported including development. residential The redevelopment of the site should consider adjacent ecological assets, such as the Waterton Alderwood SINC."

The full development potential and economic benefits of the, now vacant, Ford Engine site, under Draft Policy ENT5, will only be able to be fully realised if the policy is reworded to specifically address the uniqueness of the site, and flexibility is incorporated into Draft Policies ENT2 and ENT3 to enable site specific policies to take precedent.

The supporting text suggests that the exact detail is to be subject to refinement through future Supplementary Planning Guidance (SPG). It is our view that a SPG is not necessary and that this detail can be dealt with through a planning application and the pre-application engagement with the Local Planning Authority. Any requirement for a SPG will slow down the programme for redevelopment and delivery of the site as it would take a significant time to prepare and will ultimately be led by the market. This would further delay the date on which jobs and / or other amenity / use could once more be provided at this site. We therefore object to the approach and seek that this



requirement is removed in the supporting	
text to Draft Policy ENT5.	
As you are aware, the landowner is working	
with property professionals and a master	
planner to explore the potential of the site in	
terms of demand and quantum and type of	
potential future uses. It is Ford's intention to	
meet to discuss the development options	
with Bridgend County Borough Council in	
readiness for the Local Development Plan	
Examination. We will keep you informed of	
progress.	
Additionally, in order to meet the third test of	
soundness ('will the plan deliver?') the	
policy must be flexible in order to ensure	
that it is effective and can be viably	
implemented. Having a flexible policy within	
the Plan for ENT5 (Ford Engine site) which	
provides contingency to address market	
uncertainty will enable a positive future for	
the site and set it up for success rather than	
rendering it obsolete for a number of years	
because of a restrictive policy.	
The site is adjacent to the Waterton	
Alderwood SINC and the redevelopment of	
this site for a mix of uses presents an	
opportunity to enhance the SINC and	
complement its special features. This	
should be acknowledged in the policy and is	
included in the suggested policy wording	
above.	

Title:	Title: Do you have any comments to make on retail centres and development policies?				
ID	Comment	Summary of	Council response		
		changes being			
		sought/proposed			
82	No comment	No changes	Comments noted.		
		proposed.			
488	Only if jobs are made available in Bridgend	Only if jobs are	Comments noted. A positive employment land response is necessary to achieve a		
		made available in	homes, a growing skilled labour force and job opportunities in order to stimulate the		
		Bridgend	The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021		
			analysed this projected labour force boost alongside other employment trends		
			employment land and sector based economic forecasts. The resulting evidence ba		
			and distribution of employment need and the land best suited to meet that need		
			context of Planning Policy Wales and Technical Advice Note 23, justified further in th		
			Paper, and set out in SP11.		

e an equilibrium between new the local to regional economy. 1 Update (See Appendix 15) ds including past take up of base has informed the scale of over the plan period in the the Employment Background

516	I can read and interpret statistics. There was no pandemic statistically speaking. Nothing to do with lockdowns or social restrictions as is amply evident from similar societies that had no such restrictions. You have been play your part in an experiment that is destroying our communities and economy. You have half destroyed Bridgend town and it sounds like you want to go the whole way. Out of town retail developments are undermining our communities, our society, and impoverishing us. Protecting "the established retail hierarchy" sounds like a plan to further undermine us at the behest of those who do not vote you into existence.		Policy ENT1 supports SP11 by allocating new employment land for development. If by safeguarding the employment function of existing business and employment sits of different sites to come forward In terms of retail, Strategic Policy SP12 of the Replacement Plan will promote Town throughout the County Borough as hubs of socio-economic activity and the focal p services which support the needs of the communities they serve. As part of the technical supporting evidence base the Council have prepared a Rete of which sets out evidence-based recommendations on retail need, the distribution - primary shopping areas to inform policies and site allocations. Additionally, the Cou sense check of the evidence base in light of the pandemic (See Appendix S1 – Bac Policy Review). The 2019 Retail Study already identified a shift in commuter s shopping, which the pandemic has accelerated. The LDP recognises that high stre especially in the short-term, hence it contains more flexible planning policies and recentres, recognising their changing roles and functions. It will be increasingly importa a wider array of uses than just retail, including community, health, leisure, resider spaces alongside areas of open space. The Replacement LDP ultimately seeks to allow the traditional role and function of evolve and adapt appropriately. The hierarchy will be used positively to ensure Town throughout the County Borough as hubs of socio-economic activity and the focal p services which support Borough as hubs of socio-economic activity and the focal p services which support Borough as hubs of socio-economic activity and the focal p services which sets out evidence-base the light of the pandemic (See Appendix 51 – Bac O which sets out evidence-base in light of the pandemic (See Appendix 51 – Bac Policy Review). The 2019 Retail Study already identified a shift in commuter showed adapt appropriately. The hierarchy will be used positively to ensure Town throughout the County Borough as hubs of socio-econneic activity.
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. Policy ENT2 supports SP11 sites. This will enable a range

vn, District and Local Centres points for a diverse range of

etail Study (See Appendix 16) n of need and the definition of ouncil have also undertaken a ackground Paper 11: Covid-19 r spending habits and online treets will continue to change I retail boundaries within town tant for them to accommodate ential and flexible co-working

of established retail centres to wn, District and Local Centres unity facilities. This will both creased social and economic

wn, District and Local Centres points for a diverse range of

etail Study (See Appendix 16) n of need and the definition of buncil have also undertaken a ackground Paper 11: Covid-19 spending habits and online treets will continue to change retail boundaries within town tant for them to accommodate ential and flexible co-working

ve been reviewed against the lesteg, the Primary Shopping ondary Shopping Areas have create greater flexibility and

the impacts of the pandemic. e locations will remain key to

			The Replacement LDP ultimately seeks to allow the traditional role and function of evolve and adapt appropriately. The hierarchy will be used positively to ensure Town continue to be the principal locations for new retail, office, leisure and commun capitalise on and enhance the vitality and viability of centres, whilst generating increativity.
707	With the best will in the world, having seen the results of what the pandemic has done to retail shopping it would be difficult to predict any future for retail centres. However, in the fourth and fifth paragraphs it is mentioned that 'town centres' should accommodate 'health and well-being' centres/facilities. Have thoughts and plans changed 180'? That's exactly the opposite of what was done in Porthcawl!! So what happened there? It is interesting to note that after it was claimed that a new health centre could not be built on 'Portway car park' because the land was unavailable a new health centre was compelled to be built in Newton. As soon as the building work started at Newton a chunk of money suddenly became available to acquire the lease in and around Salt Lake. The Portway centre was closed down and health facilities moved AWAY from the town centre. Now they need to be CLOSE to a town centre. Can no-one make up their mind? A health centre near to the town in Porthcawl, with a sizeable car park to hand, would have benefitted many an aged person and help to keep the town functioning. Instead we have the Newton health centre with many a bumped marker post and dinged car within	Concerns regarding Porthcawl town centre	Comments noted. Strategic Policy SP12 of the Replacement Plan will promote Town throughout the County Borough as hubs of socio-economic activity and the focal poservices which support the needs of the communities they serve. As part of the technical supporting evidence base the Council have prepared a Reta of which sets out evidence-based recommendations on retail need, the distribution or primary shopping areas to inform policies and site allocations. Additionally, the Counsense check of the evidence base in light of the pandemic (See Appendix 51 – Back Policy Review). The 2019 Retail Study already identified a shift in commuter sphopping, which the pandemic has accelerated. The LDP recognises that high streespecially in the short-term, hence it contains more flexible planning policies and recentres, recognising their changing roles and functions. It will be increasingly importar a wider array of uses than just retail, including community, health, leisure, residen spaces alongside areas of open space. The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have existing distribution of uses and likely future requirements. In Bridgend and Maes Areas have been condensed to create a consolidated retail core. Additional Secon been identified on the proposals map for Bridgend, Maesteg and Porthcawl to cr promote the potential for a wider range of uses. The Replacement LDP ultimately seeks to allow the traditional role and function of evolve and adapt appropriately. The hierarchy will be used positively to ensure Town continue to be the principal locations for new retail, office, leisure and communicapitalise on and enhance the vitality and viability of centres, whilst generating increativity.
779	the confines of the very tight parking.	Ensure some	Comments noted. A food store is proposed for Salt Lake. Marketing for a new fo
	some retail facilities are available to people in the Sandy Bay/Salt Lake area, whilst providing access to retail in the town centre itself. i.e. extended cycle lane across the promenade and bike hiring facilities.	retail facilities are available to people in the Sandy Bay/Salt Lake area, whilst providing access to retail in the	autumn 2020 whereby numerous bids (five in total) were received and appraised. A which each bid was carefully assessed against a planning development brief result identified as the preferred bidder. Subject to a planning application, the foodstore wi all-new residential, leisure, retail development at Salt Lake as well as new areas terminus, active travel facilities and more.
		town centre itself	Eastern Promenade, if there is market demand for such uses. Ancillary commercial u along the potential Recreational Route along Sandy Bay. In these locations retail u will be particularly encouraged.
			The active travel requirements within the regeneration area are expected to facilit modes of transport across the site, both in an east to west and north to south axis.

f established retail centres to wn, District and Local Centres unity facilities. This will both creased social and economic

wn, District and Local Centres points for a diverse range of

etail Study (See Appendix 16) n of need and the definition of buncil have also undertaken a ackground Paper 11: Covid-19 r spending habits and online treets will continue to change retail boundaries within town tant for them to accommodate ential and flexible co-working

ve been reviewed against the lesteg, the Primary Shopping ondary Shopping Areas have create greater flexibility and

f established retail centres to wn, District and Local Centres unity facilities. This will both creased social and economic

foodstore was carried out in A robust selection process in sulted in Aldi Stores Ltd being will be constructed alongside as of green open space, bus

tial development fronting the I units will also be considered I uses, restaurants and cafes

ilitate the use of sustainable In addition to facilitating the

			use of sustainable modes of transport within the site, any forthcoming proposal will be connectivity to the existing Town Centre and the wider settlement of Porthcawl.
847		No changes proposed	Comments noted.
996	Taking parking from the town centre and tourist areas will mean it is less convenient to shop locally, driving people to out of town accessible shopping areas.	Concerns regarding parking in Porthcawl	Comments noted. In terms of car parking, it's acknowledged that a sound and rob critical to the success of the regeneration. As part of the strategy, the site will accon car park on the existing Hillsboro car par enabling more ground floor space to be giv development. Consideration should be given to alternative future uses as, overtime, to Porthcawl Waterfront will be principally by public transport including park and ride the number of private vehicles requiring parking facilities. Consultations confirmed concept of a multi storey car park whilst recognising it will change the immediat Hillsboro Place.
			The authority has a strong desire to facilitate and actively encourage a modal shift 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 Po as a boulevard where visitors and locals could arrive at, and depart from the regene The location of the bus terminus will enable access towards the waterfront and also the has also undertaken feasibility work to explore proposals to deliver a bus term regeneration area. The bus terminus project is being brought forward in connection Metro Plus project and is seen as a key element of the wider regeneration plans.
329	personally would like to see more enterprises come to the valleys has they have been demised by the mines disappearing years ago	Would like to see more enterprises come to the valleys	Comments noted. The Strategy recognises the need to deliver wider regener communities at a scale which acknowledges their infrastructure capacity, top constraints. Therefore, Maesteg and the Llynfi Valley is allocated as a Regeneration fact that it demonstrates the largest capacity to accommodate regeneration-led communities. There are individual sites within this area that already have the benefi are the subject of development briefs or master planning exercises to facilitate their A substantial number of these sites are also brownfield or are under-utilised, whilst als hubs, thereby demonstrating high credentials in terms of sustainable development a it is acknowledged that some will require longer lead-in times, preparatory remedia and more detailed strategies to facilitate delivery.
			The Ogmore and Garw Valleys are not identified as areas that will accommodate sign of their topographical and viability based constraints. However, these areas would be regeneration and are therefore designated as Regeneration Areas in recognition approaches are required to incite community investment opportunities.
108 5	There are enough retail centers already in the area. Where the site is proposed there are already three small food/convenience shops (Filco, Premier and One Stop). There	Concerns relating over-development and retail.	range of services which support the needs of the communities they serve.
	is also already a post office in bryntirion, a Spar in Cefn Glas and a post office in Laleston. There does not need to be any further retail developments in the area. I understand that further retail developments already planned in Broadlands.		As part of the technical supporting evidence base the Council have prepared a Reta of which sets out evidence-based recommendations on retail need, the distribution of primary shopping areas to inform policies and site allocations. Additionally, the Coursense check of the evidence base in light of the pandemic (See Appendix 51 – Back Policy Review). The 2019 Retail Study already identified a shift in commuter s shopping, which the pandemic has accelerated. The LDP recognises that high stree especially in the short-term, hence it contains more flexible planning policies and recentres, recognising their changing roles and functions. It will be increasingly important a wider array of uses than just retail, including community, health, leisure, resident spaces alongside areas of open space.

### be expected to improve active

obust parking strategy will be commodate a new multi storey given over to public realm and ne, the aspiration is that travel ide schemes, greatly reducing ed widespread support for the liate outlook of properties on

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

nerative benefits to Valleys opography and geographical on Growth Area, reflecting the ed growth within the Valleys nefit of planning permission or eir delivery and regeneration. also being aligned to transport and placemaking. However, diation-based enabling works

ignificant growth in recognition benefit from community based on of the fact that a range of

mote Town, District and Local the focal points for a diverse

etail Study (See Appendix 16) n of need and the definition of ouncil have also undertaken a ackground Paper 11: Covid-19 spending habits and online treets will continue to change retail boundaries within town trant for them to accommodate ential and flexible co-working

Agree	Support	Comments noted
Agree	Support	Comments noted
Agree	Concerns relating over-development and retail.	The demand/supply for larger convenience retailing is likely to be less sensitive to the However, use of sequential tests alongside careful management of out-of-centre I avoid promotion of unsustainable travel patterns. The Replacement LDP ultimately seeks to allow the traditional role and function of evolve and adapt appropriately. The hierarchy will be used positively to ensure Town continue to be the principal locations for new retail, office, leisure and commun capitalise on and enhance the vitality and viability of centres, whilst generating increactivity. In terms of retail provision, Strategic Policy SP12 of the Replacement Plan will promotent the county Borough as hubs of socio-economic activity and the range of services which support the needs of the communities they serve. As part of the technical supporting evidence base the Council have prepared a Reta of which sets out evidence-based recommendations on retail need, the distribution of primary shopping areas to inform policies and site allocations. Additionally, the Cou sense check of the evidence base in light of the pandemic (See Appendix 51 – Back Policy Review). The 2019 Retail Study already identified a shift in commuter s shopping, which the pandemic has accelerated. The LDP recognises that high stree especially in the short-term, hence it contains more flexible planning policies and the avider array of uses than just retail, including community, health, leisure, residen spaces alongside areas of open space. The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have existing distribution of uses and likely future requirements. In Bridgend and Maes Areas have been condensed to create a consolidated retail core. Additional Secon been identified on the proposals map for Bridgend, Maesteg and Porthcawl to core promote the potential for a wider range of uses. The Replacement LDP ultimately seeks to allow the traditional role and function of evolve and adapt appropriately. The hierarchy will be used positively to ensure Towor
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	the area. Where the site is proposed there are already three small food/convenience shops (Filco, Premier and One Stop). There is also already a post office in bryntirion, a Spar in Cefn Glas and a post office in Laleston. There does not need to be any further retail developments in the area. I understand that further retail developments already planned in Broadlands.	the area. Where the site is proposed there are already three small food/convenience shops (Filco, Premier and One Stop). There is also already a post office in bryntirion, a Spar in Cefn Glas and a post office in Laleston. There does not need to be any further retail developments in the area. I understand that further retail developments already planned in Broadlands.

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of established retail centres to wn, District and Local Centres unity facilities. This will both creased social and economic

			· · · · · · · · · · · · · · · · · · ·
254	Policy SP12		Comments noted
	We welcome the identification of Bridgend Town Centre as a 'Sub-regional Centre' – which rightly sits at the top of the defined hierarchy of retailing, commercial and service centres. We also support the commitment to protecting the established retail hierarchy (Paragraph 5.4.42) by focusing development on identified centres. Policy SP12 confirms that the centres identified within the hierarchy will be a focus for new retail, commercial, leisure, health, community, public services and appropriate employment developments. The wide range of uses identified as being appropriate within the defined centres is welcomed. This recognises that retail and commercial centres are highly sustainable locations to shop, socialise, work and conduct business. Policy SP12 fails to acknowledge that defined centres are by their nature also highly sustainable places to live. The supporting text (Paragraph 5.4.40) recognises that the co-location of facilities and services within centres will help support their long-term health and vitality as convenient and attractive places to live, work, shop, socialise, study, access services for health and well-being and to conduct business. The supporting text (Paragraph 5.4.43) also recognises that mixed use development, including those with residential provision above ground floors, should be encouraged. There is, however, no reference to residential development within the policy itself. The Replacement LDP should support this opportunity. It should also acknowledge that some groundfloor residential development may be appropriate as part of mixed use regeneration schemes. Whilst the policy supports a wide range of uses within defined centres, it also places restrictions on the type of floorpsace considered appropriate at groundfloor – to retail, community or commercial (although it	wording should support residential development within retailing and commercial centres	Policy SP12 identifies the Retail and Commercial Hierarchy which, in compliance w policy of PPW, promotes Town, District and Local Centres as hubs of socio-ecomo points for a diverse range of services which support the needs of the communities supporting policies acknowledge that these centres are moving away from their tradi- to encourage a wider variety of services and facilities given their sustainable location As the representor has recognised, the supporting text to SP12 acknowledges the ro can play in increasing the vitality and viability of these centres. In appropriate circur elements of residential development. The supporting policies to SP12 provide further may be considered acceptable. In the absence of any suggestion of alternative policy felt necessary to repeat the wording of the supporting text or that of Policy ENT7 or E

e with the Town Centre First phomic activity and the focal es they serve. SP12 and its aditional retail roles and seek ons.

role mixed use development cumstances, this can include her guidance as to when this cy wording, it is therefore not r ENT8 in Policy SP12.

is noted that Paragraph 5.4.43 refers to retail and/or commercial floorspace only). Whilst the general principle of requiring such uses at groundfloor is supported, the		
Replacement LDP should allow sufficient flexibility for other uses to come forward where appropriate.		
The supporting text (Paragraph 5.4.47) notes that the Retail Study identifies that Bridgend Town Centre has a higher proportion of vacancy rates. The Study also identified gaps in the range of leisure uses available within the centre. The supporting text therefore states that the Replacement LDP will promote more flexibility by increasing the range of community, leisure, and social facilities on offer. Restrictions to groundfloor uses should not be applied too rigidly – instead allowing opportunities for office, leisure, entertainment, cultural and community facilities to support the vibrancy, vitality and attractiveness of centres.		
Policy ENT6		
Our client owns and manages the Bridgend Shopping Centre, which is identified as part of a wider 'key site' (referred to as 'Southside') where refurbishment / redevelopment will be favoured. The wider key site also includes land at Cheapside, Brackla Street and the Police Station. Our client welcomes the identification of the Bridgend Shopping Centre as part of the	Policy ENT6(1) should be extended to include land to the east Policy ENT6 should refer to	Policy ENT6 supports the regeneration of retail and commercial centres, thre redevelopment of key sites and buildings for retail, commercial, leisure, education uses. The Replacement LDP also acknowledges and supports the projects and emerging Bridgend Town Centre Masterplan to improve the quality of the town centre more flexibility by increasing the range of community, leisure, and social facilities on site is one such project identified within the Masterplan and is incorporated within the Commercial Centre.
Southside regeneration area. The shopping centre will form a key part of any future regeneration plans.	other acceptable uses – including residential	The key sites identified in Policy ENT6 are rollover sites from the existing LDP and pr retail floor space that goes above and beyond providing for the quantitative need id As such, it is not felt that additional sites need to be specifically identified or allocated framework is in place to enable the regeneration of previously developed and b
However, the extent of the Southside 'key site' should be extended to include additional land to ensure the comprehensive regeneration of the area. The boundary of the Southside 'key site' should extend further to the east – to include additional land off Brackla Street and Cheapside (including the existing ALDI store, Brackla Multi-storey Car Park and Brackla House). This extended boundary is required to enable the comprehensive	The policy and supporting text should be amended to: • Extend the boundary of the Southside key site to include additional land to the east (at	commercial centres. Additionally, no such sites were promoted through the Candida Policy ENT6 recognises that existing town and district centres represent the most s retail proposals. The Retail Study has calculated comparison and convenience constant market shares approach, which assumes that existing shopping patterns LDP period (2018 – 2033). The Study identifies limited quantitative needs acros qualitative retail needs in Bridgend (to improve comparison fashion, leisure environment) and Porthcawl (to improve main food shopping offer). This reflects ma to influence demand for new retail and commercial leisure floorspace across the LD likely to have become more pronounced as a result of the Coronavirus pandemic, retail closed and online shopping becoming the norm. In terms of location, as exis
	<ul> <li>where appropriate.</li> <li>The supporting text (Paragraph 5.4.47) notes that the Retail Study identifies that Bridgend Town Centre has a higher proportion of vacancy rates. The Study also identified gaps in the range of leisure uses available within the centre. The supporting text therefore states that the Replacement LDP will promote more flexibility by increasing the range of community, leisure, and social facilities on offer. Restrictions to groundfloor uses should not be applied too rigidly – instead allowing opportunities for office, leisure, entertainment, cultural and community facilities to support the vibrancy, vitality and attractiveness of centres.</li> <li>Policy ENT6</li> <li>Our client owns and manages the Bridgend Shopping Centre, which is identified as part of a wider 'key site' (referred to as 'Southside') where refurbishment / redevelopment will be favoured. The wider key site also includes land at Cheapside, Brackla Street and the Police Station. Our client welcomes the identification of the Bridgend Shopping Centre as part of any future regeneration plans.</li> <li>However, the extent of the Southside 'key site' should be extended to include additional land to ensure the comprehensive regeneration of the area. The boundary of the Southside 'key site' should be extended to include additional land off Brackla Street and Cheapside (including the existing ALDI store, Brackla Multi-storey Car Park and</li> </ul>	<ul> <li>where appropriate.</li> <li>The supporting text (Paragraph 5.4.47) notes that the Retail Study identifies that Bridgend Town Centre has a higher proportion of vacancy rates. The Study also identified gaps in the range of leisure uses available within the centre. The supporting text therefore states that the Replacement LDP will promote more flexibility by increasing the range of community, leisure, and social facilities on offer. Restrictions to groundfloor uses should not be applied too rigidly – instead allowing opportunities for office, leisure, entertainment, cultural and community facilities to support the vibrancy, vitality and attractiveness of centres.</li> <li>Policy ENT6</li> <li>Our client owns and manages the Bridgend Shopping Centre, which is identified as part of a wider 'key site' (referred to as 'Southside') where refurbishment / redevelopment will be favoured. The wider key site also includes land at Cheapside, Brackla Street and the Police Station. Our client welcomes the identification of the Bridgend Shopping Centre as part of the Southside regeneration area. The shopping centre will form a key part of any future regeneration plans.</li> <li>However, the extent of the Southside 'key site' should be extended to include additional land to ensure the comprehensive regeneration of the area. The boundary of the Southside 'key site' should extend further to the east – to include additional land off Brackla Street and Cheapside (including the existing ALDI store, Brackla Multi-storey Car Park and Brackla House). This extended boundary is</li> </ul>

through the refurbishment or tion and other complementary and measures identified in the entre environment and promote on offer. The wider 'Southside' the boundary of the Retail and

I provide a quantum of potential d identified in the Retail Study. ated given the supportive policy d brownfield sites in retail and didate Site Assessment.

t sustainable locations for new ce retail needs based on the rns will remain stable over the ross the County Borough and e and the general shopping market trends which are likely LDP period. These trends are nic, when all but non-essential xisting town centres, Bridgend

mixed use regeneration of the area	Brackla	and Porthcawl represent the most sustainable locations for new retail development f
<ul> <li>mixed use regeneration of the area, including the necessary reconfiguration of the existing road layout. The policy confirms that the refurbishment or redevelopment of key sites for retail, commercial, leisure, education and other complementary uses will be favoured.</li> <li>The breadth of uses identified in Policy ENT6 is welcomed. Notwithstanding this, we would like to see specific reference within Policy ENT6 to other uses that may be appropriate as part of any regeneration proposal – in particular residential. The wider Southside site has clear potential to accommodate new residential development. Policy ENT6 specifically refers to the provision of 9,900 sq m of retail and food and drink uses as part of the Southside key site. The supporting text (Paragraph 5.4.58) also refers to the mixed use regeneration of Southside including 9,990 sq m of 'reconfigured and refurbished existing space at the Bridgend Shopping Centre'.</li> <li>Whilst our client supports the identification of floorspace for retail and food/drink as part of the regeneration of the Southside area, Policy ENT6 should clearly state that other</li> </ul>	prescriptive regarding the amount and nature of floorspace to be brought forward. • Be sufficiently flexible to allow a wide range of uses – including retail, commercial, leisure, education, community and residential.	and Porthcawl represent the most sustainable locations for new retail development f and social perspective. The Deposit LDP will seek to encourage retail proposals to si well served by existing public transport networks meaning they are best placed to those without access to a car). This strategy has clear social and environmental be car dependency and making use of existing infrastructure. PPW acknowledges town of for retail and leisure uses. In terms of form and scale, the Retail Study confirms designations in Bridgend provide sufficient capacity to meet long-term compariso confirms that long-term convenience needs could be delivered early in the plan per food shopping facility in Porthcawl to meet evidenced qualitative needs. The Policy ENT6 allocations are not intended to be restrictive, just to demonstrate existing centres to meet the identified need. This will help prevent inappropriate assisting rather than hindering regeneration efforts.
uses would also be appropriate as part of the regeneration proposals (including leisure, community, education and residential).		
It is important that Policy ENT6 allows sufficient flexibility in terms of the nature and quantum of floorspace to be brought forward as part of any future regeneration plans. It should not be overly prescriptive as this could unduly restrict the ability of future regeneration proposals to respond to market demand and the changing nature of town centres. This is supported by PPW (Paragraph 4.3.22), which states that planning authorities should not prescribe rigid floorspace limits on allocated sites that would unreasonably inhibit the retail industry from responding to changing demand and opportunity. PPW also		

nt from both an environmental o sites in town centres that are to serve residents (including benefits in terms of reducing vn centres as the best location ms that the regeneration site rison needs. The Study also period to provide a new main

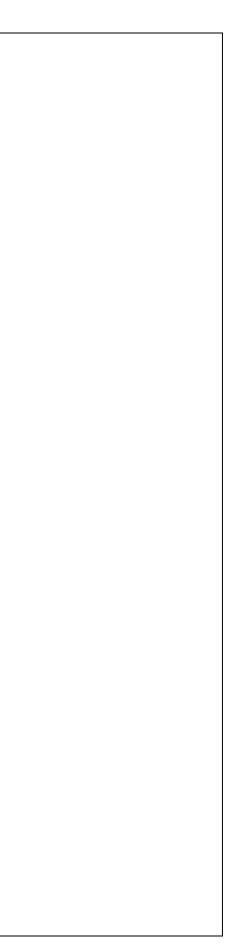
ate that capacity exists within iate development elsewhere,

 		-
recognises that mixed use developments, which combine retailing with entertainment, restaurants and, where appropriate, residential in a comprehensive and planned way should also be encouraged (Paragraph 4.3.34). The Southside area is identified as a 'Retail and Commercial Development Site' on the Proposals Map. The Replacement LDP should be clear that the Southside area has the potential to accommodate a much wider range of uses, including education and residential.		
In summary, our client welcomes the inclusion of the Bridgend Shopping Centre within the wider Southside regeneration site.		
However, the policy and supporting text should be amended to:		
• Extend the boundary of the Southside key site to include additional land to the east (at Brackla Street/Cheapside).		
<ul> <li>Not be overly prescriptive regarding the amount and nature of floorspace to be brought forward.</li> </ul>		
• Be sufficiently flexible to allow a wide range of uses – including retail, commercial, leisure, education, community and residential.		
Policy ENT7		
Policy ENT7 requires proposals at groundfloor to be for Class A1 floorspace – unless specific criteria are met. The supporting text (Paragraph 5.4.62) provides further context – stating that the policy is intended to enforce strict criteria to protect the viability and vitality of Primary Shopping Areas.	We recommend that Criterion (1) and (2) are deleted from Policy ENT7	The criteria contained within Policy ENT7 are not considered to be overly restrictive. an element of control and a degree of subjectivity when assessing future developm Policy ENT7 is considered to provide sufficient flexibility for a range of proposals to have been devised to enable such proposals to be assessed on a case-by-case to suggested. By doing so, rather than having a negative impact on town centres, the effect by ensuring that proposals are of sufficient quality to help increase and pro- vitality of town centres. This is something that the representor has alluded to in the
Our client has significant concerns that, as currently worded, the policy fails to provide sufficient flexibility regarding the type of uses acceptable within Primary Shopping Areas.		

ve. They are intended to provide provide proposals.

Is to come forward. The criteria be basis, as the representor has the Policy will have the opposite promote the attractiveness and their representation.

Whilst the policy is intended to protect the viability and vitality of Primary Shopping Areas, we are concerned that enforcing strict criteria in this way could have a negative impact on town centres. It is vital that the Replacement LDP recognises, and reflects, the changing nature of retail and town centres, which have moved away from the traditional expectation of the high street. Whilst retail uses will generally underpin retail and commercial centres, it is vital that centres offer a diverse range of uses. Attracting a		
wider range of uses (including food/drink and leisure) is crucial to driving up footfall, increasing dwell time and extending uses across the day and night.		
Our client owns and manages the Bridgend Shopping Centre. A large proportion of the centre is identified as Primary Shopping Frontage on the Proposals Map (with two units falling within the Secondary Shopping Frontage). The centre currently has three vacant units.		
Whilst the vacant units may be occupied by retail uses in the future, the Replacement LDP should not unduly restrict other appropriate town centres uses at the 'Mall Level' of the centre. This would be overly restrictive and would most likely result in units remaining vacant, rather than being let. The centre currently comprises a mix of Class A1, A2 and A3 uses at ground floor level. A unit at the 'Plaza Level' has also been let to a D2 gym use. Moving forward, it should remain acceptable to let vacant units within the centre for other appropriate town centre uses, such as food/drink, leisure and services.		
As recognised by the Retail Study, such uses are capable of driving footfall and improving the vitality and vibrancy centres. In light of the above, Policy ENT7 should be amended to provide greater flexibility when attracting new occupiers to town centres.		



	We recommend that Criterion (1) and (2) are deleted from Policy ENT7. This would still retain a degree of control over non-A1 uses, but would provide greater flexibility and allow uses to be considered on a case by case basis. Criterion 4 (as per the current policy) would still require proposals to demonstrate that the vitality, viability and character of the centre is not harmed. The other criteria (currently (3) and (5) would ensure that proposals do not create dead frontages or give rise to other issues (including traffic, amenity etc). This approach would also be more in line with that proposed in relation to Secondary Shopping Areas.		
	For clarity, the Replacement LDP should acknowledge that part of the defined Primary Shopping Area within Bridgend Town Centre forms part of the Southside key site (under Policy ENT6). The extent/location of the Primary Shopping Area will need to be reviewed as this scheme progresses. Please note - comments re: Policy ENT7/ENT8 are made at the end of this form due to space limitations		
554	Welcome more retail as maestrg is becoming a ghost town	No changes proposed – more retail needed in Maesteg	Strategic Policy SP12 of the Replacement Plan will promote Town, District and L County Borough as hubs of socio-economic activity and the focal points for a diver- support the needs of the communities they serve. As part of the technical supporting evidence base the Council have prepared a Ret of which sets out evidence-based recommendations on retail need, the distribution primary shopping areas to inform policies and site allocations. The Study identified a habits and online shopping, which the pandemic has accelerated. The LDP reco continue to change especially in the short-term, hence it contains more flexible boundaries within town centres, recognising their changing roles and functions. It w for them to accommodate a wider array of uses than just retail, including communit and flexible co-working spaces alongside areas of open space. The Primary Shopping Area boundary for Maesteg has been reviewed against the and likely future requirements. As such, the Primary Shopping Area has been consolidated retail core. An additional Secondary Shopping Area has been identified and promote the potential for a wider range of uses. The Replacement LDP ultimately seeks to allow the traditional role and function of evolve and adapt appropriately. The hierarchy will be used positively to ensure Tow

d Local Centres throughout the diverse range of services which

Retail Study (See Appendix 16) ion of need and the definition of ed a shift in commuter spending ecognises that high streets will ble planning policies and retail It will be increasingly important unity, health, leisure, residential

he existing distribution of uses been condensed to create a ified to create greater flexibility

of established retail centres to own, District and Local Centres

			continue to be the principal locations for new retail, office, leisure and commun capitalise on and enhance the vitality and viability of centres, whilst generating incr activity.
28	/ No		Comments noted
38	Support town centre first approach and general town centre regeneration. please refer to covering letter submitted on Coastal's behalf.	None	Comments noted.
139	<ul> <li>Policy ENT6 allocates retail and food and drink floorspace at Southside (Bridgend Town Centre) and Porthcawl Waterfront. The Policy states that complementary proposals outside these areas will be supported within allocated mixed use Strategic sites where:</li> <li>a) it forms part of a site specific proposal and included in a masterplan;</li> <li>b) it is sited in an appropriate, central location within a community that it is to serve, and close to a public transport corridor;</li> <li>c) it is of scale to meet and identified and evidenced need; and</li> <li>d) it would not harm vitality, viability and attractiveness of a designated centre.</li> <li>It is notable that the Deposit Plan differs from the Adopted LDP in that no specific floorspace allocations are made in respect of strategic sites, and of concern, no mention is made of proposed mixed-use sites such as Parc Afon Ewenni, despite the scale of development proposed, and already established need for commercial facilities to serve the development and surrounding areas.</li> <li>The supporting text at 5.4.60 does refer to large-scale or mixed-use developments, and that there is a case for providing a new retailing centre at a scale and size proportionate to the site as a whole.</li> </ul>	floorspace thresholds for all Strategic Sites and large-scale residential or mixed-use development allocations, and allocate 2,900sqm net retail floorspace on Parc Afon Ewenni	Policy ENT6 seeks to facilitate the provision of new locally scaled convenience goo the need can be identified. In the case of large-scale residential developments, the new retailing centre incorporating other retailing, leisure and commercial uses at as to the site as a whole. Masterplan Development Principles are outlined for the Strat 5. The policy framework is therefore considered appropriate in its current form. The (2019) Retail Study has calculated comparison and convenience retail needs be shares approach, which assumes that existing shopping patterns will remain stable – 2033). The Study identifies limited quantitative needs across the County Borough in Bridgend (to improve comparison fashion, leisure and the general shopping envi improve main food shopping offer). This reflects market trends which are likely to infu and commercial leisure floorspace across the LDP period. A refreshed (2022) Retail Study Update has been undertaken to re-examine retail r This Study analysed trends affecting the retail sector which may impact and influer county borough and how this may change over time. It also assessed future i convenience retail floorspace to 2033, based on existing market shares. The 2022 St for 12,790 sq.m of additional comparison retail sales area floorspace over the whole which there is medium-term capacity for 6,291 sq.m sales area (by 2028). The S comparison need identified should be met within existing town centres in the first i Planning Policy Wales' Town Centre First' principle. Refreshed primary survey wo than sufficient capacity (i.e. vacancies) within town centres to accommodate the c floorspace identified. Conversely, the 2022 Study evidences less capacity in the cor to the Aldi foodstore commitment at land at Salt Lake, Porthcawl (Planning Applic This leaves capacity for just 403 sq.m of additional convenience retail sales area floo period (up to 2033), of which, there is no capacity for additional convenience retail medium term. The 2022 Study concludes that the strategic sites offer th

unity facilities. This will both acreased social and economic

oods retailing provision where here is a case for providing a a scale and size proportionate rategic Sites in Policies PLA1-

based on the constant market ole over the LDP period (2018 gh and qualitative retail needs nvironment) and Porthcawl (to offluence demand for new retail

il need within the BCBC area. Jence local retailing within the e needs for comparison and Study now evidences capacity ole plan period (up to 2033) of e Study recommends that the st instance in accordance with work has shown there is more e comparison retail sales area convenience goods sector due lication P/21/835/FUL refers). loorspace over the whole plan ail floorspace in the short and portunity to deliver the shortfall ion to accommodate the small

he Retail Background Paper, need identified will be met by wn Centres, the re-use and es on new strategic sites. This the circumstances where new ere they can demonstrate they ansport.

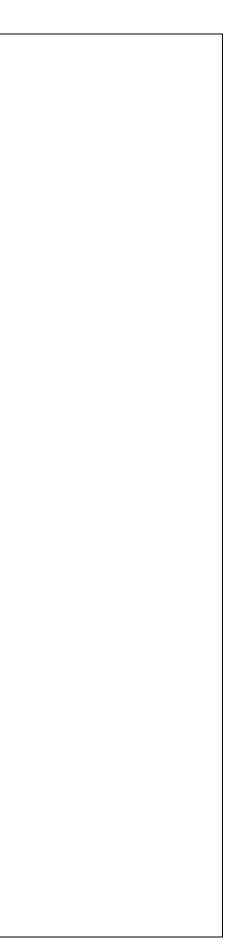
the circumstances where new ere they can demonstrate they ansport.

<ul> <li>provided in all sites where there is substantial housing growth.</li> <li><u>Justification</u> In support of the proposed retail floorspace, the Parc Afon Ewenni Retail Report is submitted and confirms the following: <ul> <li>Notwithstanding the Bridgend Retail Study (2018) conclusions that there is minimal convenience goods capacity during the plan period, our assessment has shown that there is substantial overtrading of the existing stores closest to the site. The Retail Study (2018) has simply forecast growth from this point without appropriate regard to the trading conditions of existing stores</li> <li>Existing stores in Zone 1 (within which the site is situated) are considered to be overtrading by some £34.2M (26% above average levels). </li> <li>The degree of overtrading is considered to be evident in the congested nature of the stores, car parks and highways network around the stores.</li> <li>The proposed c. 2615sqm of convenience goods provision would only equate to around £12.3M of this expenditure, and even less when taking account of committed floorspace by virtue of the adopted LDP allocation and the extant planning permission.</li> <li>There is a clear retail need to support the increase in the size of the Local Centre proposed, enabling the facilities to both provide for future residents of the development and neighbouring areas, as well as a modest proportion of trade from beyond by virtue of the site's prominent location on a key transport corridor into Bridgend. <ul> <li>Given the degree of overtrading of existing stores, particularly in terms of Discount Foodstores, the modest amount of trade diversion can be accommodated without any credible threat to existing stores and the </li> </ul></li></ul></li></ul>	The Council equally recognises the important role that local shopping facilities play in and appreciates that their provision can mean a vital service is provided to local peopl growth this may result in the need to provide new local convenience goods retailing ei- new development to meet the everyday needs of the residents. This is likely to occur commercial centres identified in SP12. Policy ENT6 therefore seeks to facilitate the scaled convenience goods retailing provision where the need can be identified. In residential or mixed-use developments incorporating a significant element of resident case for providing a new retailing centre incorporating other retailing, leisure and cc and size proportionate to the site as a whole. The Mixed-Use Strategic Development provide site-specific requirements for these sites and Require masterplans to be prep Council prior to development to demonstrate how these principles will be delivered in manner. The proposal to set additional retail thresholds within ENT 6 is therefore not Moreover, PPW (Edition 11) references the potential impacts of retail developments and commercial centres, including changes "in turnover and trading ability, consume patterns, footfall, as well as affect centre regeneration strateliges and existing or prop in the development plam" (para 4.3.25). PPW also states, "all retail planning applicatio of 2,500 sq. metres or more gross floorspace that are proposed on the edge of ro rout commercial centres should, once a need has been established, be supported by a (para 4.3.26). The representor's proposal is not supported and would be of detriment principle enshrined in national policy and promoted by the Replacement LDP Strategr

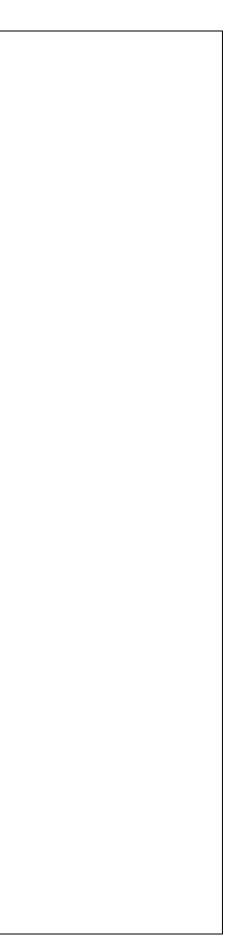
in serving their communities ople. In areas of new housing either within, or close to, the ur outside of the retailing and the provision of new locally . In the case of large-scale ential development, there is a commercial uses at a scale ent Site Policies (PLA1-5) all repared and agreed with the d in an appropriately phased not supported.

nts outside designated retail mer choice, traffic and travel roposed retail sites allocated ations or retail site allocations outside designated retail and a retail impact assessment" ace at Parc Afon Ewenni) is y a retail impact assessment. ent to the Town Centre First egy.

vitality, viability and attractiveness of designated centres.		
• The proposed increase can therefore be considered acceptable in retail policy terms, and significantly assist in the deliverability of this important brownfield regeneration opportunity.		
Proposed Changes - Deposit Plan Policy & Proposals Map		
Policy ENT6 (Retail and Commercial Development)		
Policy ENT6 relates to Retail and Commercial Development and therefore applies to new retail and leisure development within the sites described within the policy wording. The proposed alterations to accommodate the Parc Afon Ewenni proposal are set out below:		
<ul> <li>"The regeneration of retail and commercial centres, through the refurbishment or redevelopment of key sites and buildings for retail, commercial, leisure, education and other complementary uses, will be favoured. The following sites are identified as key sites:</li> <li>1) Southside – Land at the Bridgend Shopping Centre, Cheapside, Police Station and Brackla Street, Bridgend – 2.31ha (including 9,990m<sup>2</sup> of retail and food and drink)</li> <li>2) Porthcawl Waterfront Regeneration Area, Porthcawl – 2,500m<sup>2</sup></li> </ul>		
Outside of the above, retail, leisure and appropriate complementary commercial proposals will be supported within allocated mixed use Strategic sites and large-scale residential or mixed-use development allocations only where:		
a) It is specifically identified as an opportunity as part of a site specific proposal and included within the masterplan as an integral element of a		



planned new neighbourhood to reinforce a	
sense of place;	
b) It is sited in an appropriate, central	
location within the community that it is to	
serve, and within close proximity to a	
public transport corridor;	
c) It is of an appropriate scale to meet an	
identified evidenced need; and	
d) It would not negatively impact upon the	
vitality, viability and attractiveness of a	
designated Centre".	
We would also suggest consideration is	
given to establishing floorspace thresholds	
for all Strategic Sites and large-scale	
residential or mixed-use development	
allocations would be beneficial and provide	
the certainty offered by the proposed	
wording in respect of Southside and the	
Porthcawl Waterfront Regeneration Area. In	
doing so, we would request the Parc Afon	
Ewenny is allocated for 2,900sqm net retail	
floorspace. The proposed change to the	
policy wording is supported by the reasoned	
justification already outlined at paragraph	
5.4.60 of the Deposit Plan, which states:	
"The Council recognises the important role	
that local shopping facilities play in serving	
their communities and appreciates that	
their provision can mean a vital service is	
provided to local people. In areas of new	
housing growth this may result in the need	
to provide new local convenience goods	
retailing either within, or close to, the new	
development to meet the everyday needs	
of the residents. This is likely to occur	
outside of the retailing and commercial	
centres identified in SP12. <u>Policy ENT6</u>	
therefore seeks to facilitate the provision	
of new locally scaled convenience goods	
retailing provision where the need can be	
identified. In the case of large-scale	
residential or mixed-use developments	
incorporating a significant element of	
residential development, there is a case	
for providing a new retailing centre	
incorporating other retailing, leisure and	
commercial uses at a scale and size	



proportionate to the site as a whole". (our underlining)

In line with the Placemaking objectives to PPW 11, the proposals would provide highquality retail with good linkages to the surrounding communities, to enable them to undertake their convenience shop and socialise within easy walking / cycle distance of new homes. This approach accords with PPW 11 paragraph 3.50 which states: "Planning authorities should adopt policies to locate major generators of travel demand, such as housing, employment, retailing, leisure and recreation, and community facilities (including libraries, schools, doctor's surgeries and hospitals), within existing urban areas or areas which are, or can be, easily reached by walking or cycling, and are well served by public transport".

#### **Conclusion**

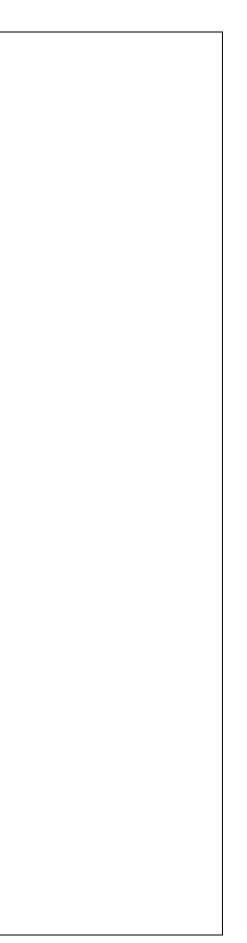
• Whilst the Bridgend Retail Study (2018) suggests that there is no quantitative need for significant convenience goods floorspace within the plan period, a finegrained analysis of Zone 1 stores survey derived turnover against company average (benchmark) sales densities has identified substantial overtrading of existing stores. This is particularly the case for the existing Lidl and Aldi stores which are estimated to be trading at well over double of their company average levels.

• The approach taken by the Retail Study (2018) to only forecast growth of the base year effectively masks this overtrading and protects it to the benefit of the existing stores. It can hide adverse implications of overtrading such as store congestion, which could in part be eased by increased floorspace provision and competition. Accordingly, there is a clear need for further convenience floorspace in Bridgend.

• The quantitative need for further floorspace is supported by a qualitative need, including the reduction of overtrading of existing stores, improving the conditions



within those stores and also their car parks and the surrounding highway network. The provision of a higher end foodhall unit is considered to be a key benefit to consumers, increasing competition and choice within Bridgend, and lessening the need to travel out of the town to equivalent existing facilities.		
• In sequential terms, it is considered that the primary role of the proposed development will be to provide a local centre to meet the needs of the emerging community, as well as serving neighbouring areas which are noted to be underserved. The scale of development is such that it can also serve a wider area as a result of its excellent central location and transport links along a key corridor into the town from the east.		
• Given the proposed development will be convenience goods focused, with a discount foodstore and a higher end foodhall, the majority of the turnover will be convenience goods focused, and the majority of the trade diversion will fall upon existing foodstores in Zone 1. The aforementioned assessment of actual vs benchmark performance has confirmed that all main foodstores in the Zone are trading above average levels and are therefore highly unlikely to be subject to any significant impacts which could leave them vulnerable. Accordingly, it stands to reason that there can be no suggestion that the proposed development would cause an unacceptable impact to a designated centre.		
• The proposed increase in retail floorspace on the Parc Afon Ewenny site has been demonstrated to be acceptable in relation to the relevant retail policy tests, and would therefore enhance the viability of the site allocation coming forward to make a significant contributions towards the substantial infrastructure costs associated with the development of the site.		



219	ENT6: Retail and Commercial Development This policy allocates two sites within Bridgend Town Centre as Retail and Commercial Development Sites and sets out policy support for proposals that results in their delivery. As BCBC will be aware, Bridgend College have an aspiration to deliver new campus within Bridgend Town Centre and therefore support the identification of Southside (and the police station site at Cheapside within it) as a Retail and Commercial Development Site and of education being identified as a suitable land use. Support: Policy ENT6 is supported.	ENT6: No changes being proposed.	Comments of support noted.
407	N/A	No changes proposed	Comments noted.

Title:	Do you have any comments to make on the ro	enewable energy mi	neral resources and waste management policies?
ID	Comment	Summary of changes being sought/proposed	Council response
82	Policy ENT10 (Low Carbon Heating Technologies for New Development). This is covered by Building Regulations with increases to Part L proposed for 2022 and 2025. The requirement for an Energy Masterplan is triggered by 'major development' which is defined by WG as 10 units or more. BDW consider that a higher threshold should be used and stress that it is not viable to incorporate low carbon heating technologies on such small sites.	Proposal to set a higher threshold within ENT10.	The Council has an aspiration for all new homes to be net zero carbon in the first ins Area Energy Strategy and Renewable Energy Assessment identifies those areas co development for district heat, hybrid and electric-heating solutions in combination with fabric retrofit. Policy ENT10 outlines a sequential approach that requires new major d sustainable heating and cooling systems have been selected in the first instance, wh financially viable. The requirement for new major development to be accompanied by an Energy Ma contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, energy efficiency and energy conservation, planning authorities should consider in policies requiring applications for major development to be accompanied by an Energy energy technologies that could be incorporated into the development. A respon developer should also accompany the application. If planning authorities feel that in been given to energy issues in project design, they may refuse planning permission the threshold beyond 10 units is therefore not justified and not supported.
	Policy ENT11 (Energy Efficiency Provision Within the Design of Buildings). The requirement for an Energy Masterplan is triggered by 'major development' which is defined by WG as 10 units or more. BDW consider that a higher threshold should be used.	Proposal to set a higher threshold within ENT11.	ENT11 continues the Council's current approach to seeking more energy efficient and development that is environmentally sustainable in a wider sense in order Objectives for the County Borough and national policy objectives. ENT11 seeks to standard of any new development is optimised to achieve energy efficiency an Development proposals must demonstrate that sustainable design standards are inter construction and operation, ensuring that they are considered at the beginning of requirement for new major development to be accompanied by an Energy Mas

instance. The Bridgend Local considered to be suitable for with different levels of targeted r development to demonstrate where technically feasible and

Masterplan follows the advice es, "In order to further promote er including development plan ergy Report. This independent ncy and appropriate renewable oonse to that report from the t insufficient consideration has ion". The proposal to increase

nt and lower carbon housing, er to achieve the Vision and to ensure that the design and and zero carbon emissions. Integral to the proposal through g of the design process. The fasterplan follows the advice

			contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states,
			energy efficiency and energy conservation, planning authorities should consider in policies requiring applications for major development to be accompanied by an Energy report should include recommendations to the developer relating to energy efficiency
			energy technologies that could be incorporated into the development. A resport developer should also accompany the application. If planning authorities feel that in
			been given to energy issues in project design, they may refuse planning permission
			the threshold beyond 10 units is therefore not justified and not supported. Further gu
			principles and requirements set out in ENT11 will be provided within a future Su Design SPG.
448	More people means more cars. These	Concerns	Comments noted. Whilst it is beyond the scope of the LDP to control the ownersh
	people in affordable housing cannot afford	regarding	Policy 5: Sustainable Transport and Accessibility will ensure that development must
	electric Tesla cars but will bring old diesel	increase of motor	a way that minimises the need to travel, reduces dependency on the private car and
	vehicles into Bridgend	vehicles as a result of proposed	to employment, education, local services and community facilities. Development w contribute towards the provision of, active travel scheme, public transport measure
		developments	other transport measures, in accordance with the Bridgend Local Transport Plan a
			Network Plan (See Appendix 29).
			Strategic site allocations identified by policies PLA1-PLA5 detail the site-spec
			masterplan development principles and development requirements. Such requireme
			orientated development that prioritises walking, cycling and public transport use, w
			vehicle dependency. Well-designed, safe walking and cycling routes must be incor
516	Zero carbon is zero life. It is a destructive	Concerns	to foster community orientated, healthy walkable neighbourhoods. Under the Environment (Wales) Act (2016), Wales is required to reduce net green
010	and immeasurably stupid goal. Any strategy	regarding zero	least 80% by 2050, with interim targets and carbon budgets established to ensur
	based on the idea that reducing carbon is a worthy goal is flawed at its core. This	carbon aims	Government have also introduced targets specifically related to local energy generative achieved by 2030.
	strategy needs to be based on science, not ideology.		A Renewable Energy Assessment (REA) (See Appendix 17) identifies the contribution
			is potentially able to make towards meeting the national renewable energy target
			technology (See Table 20, page 160). The REA has been informed by The We
			Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners
			The Assessment estimates the current and future energy demands of the Count
			progress in meeting these demands from local low carbon energy generation assets. within the County Borough boundary has been subject to a resource assessment
			renewable and low carbon energy project deployment from a resource perspective.
			Strategic Policy 13 (and supporting development management policies) will assist the
			to a low carbon, decentralised energy system that works for its individuals, comm
707	So for this is the only subject that I am	No obongoo	encouraging renewable and low and zero carbon energy projects.
707	So far, this is the only subject that I can readily agree with as being practical.	No changes proposed.	Comments noted.
847	No	No changes	Comments noted.
		proposed	
996	No	No changes proposed.	Comments noted.
329	yes good idea and the way forward but has	Renewable	Support noted. Affordability of renewable energy serving households is a non-mater
Í	has to contribute to with in the area in which	energy needs to	
1	its happened like wind farms etc ,and	be affordable	

es, "In order to further promote r including development plan ergy Report. This independent onse to that report from the insufficient consideration has on". The proposal to increase guidance on implementing the Sustainable Construction and

ship of private cars, Strategic ist be located and designed in ind enables sustainable access will be required to deliver, or ures, road infrastructure, and in and the Bridgend Integrated

ecific requirements including nents include pursuing transitwhilst reducing private motor corporated throughout the site

enhouse gas emissions by at sure this target is met. Welsh heration and ownership, to be

ution that the County Borough gets through various forms of Welsh Government's Practice ers, September 2015.

unty Borough, along with the ts. Against this backdrop, land ent to identify the potential for e.

the County Borough transition nmunities and businesses by

terial planning consideration.

			-
	renewables energy need to be affordable to house olds if there is need for change		
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	No specific comments to make.	No changes	Comments noted
554	We need more renewable energy	No changes proposed – more renewable energy needed	The Council recognises the significant role of renewable energy has to play. The Renewable Energy Assessment (See Appendix 17). The Assessment estimates the demands of the County Borough, along with the progress in meeting these dema energy generation assets. Against this backdrop, land within the County Borough be a resource assessment to identify the potential for renewable and low carbon energy resource perspective. A number of technologies have been considered, including, we solar pv, biomass energy, energy from waste, hydropower energy and building integravailable within the County Borough. In order to reduce future energy demand introduced that seek to maximise the energy efficiency of new development, integrational section.
			wider development proposals, and ensure that low carbon heating systems are inst
287	No		Comments noted
253	Policy ENT10 (Low Carbon Heating Technologies for New Development). This is covered by Building Regulations with increases to Part L proposed for 2022 and 2025. The requirement for an Energy Masterplan is triggered by 'major development' which is defined by WG as 10 units or more. BDW consider that a higher threshold should be used and stress that it is not viable to incorporate low carbon heating technologies on such small sites.	Proposal to set a higher threshold within ENT10.	No action is considered necessary. The Council has an aspiration for all new homes first instance. The Bridgend Local Area Energy Strategy and Renewable Energy A areas considered to be suitable for development for district heat, hybrid and e combination with different levels of targeted fabric retrofit. Policy ENT10 outlines requires new major development to demonstrate sustainable heating and cooling s in the first instance, where technically feasible and financially viable. The requirement for new major development to be accompanied by an Energy Ma contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states energy efficiency and energy conservation, planning authorities should consider policies requiring applications for major development to be accompanied by an Energy energy technologies that could be incorporated into the development. A respon developer should also accompany the application. If planning authorities feel that in been given to energy issues in project design, they may refuse planning permission the threshold beyond 10 units is therefore not justified and not supported. As Government, Energy Masterplans for major developments and exploring heat networ
	Policy ENT11 (Energy Efficiency Provision Within the Design of Buildings). The requirement for an Energy Masterplan is triggered by 'major development' which is defined by WG as 10 units or more. BDW consider that a higher threshold should be used.	Proposal to set a higher threshold within ENT11.	16 (Future Wales). No action is considered necessary. ENT11 continues the Council's current approace efficient and lower carbon housing, and development that is environmentally sust order to achieve the Vision and Objectives for the County Borough and national politito ensure that the design and standard of any new development is optimised to accer carbon emissions. Development proposals must demonstrate that sustainable of to the proposal through construction and operation, ensuring that they are considered design process. The requirement for new major development to be accompanied follows the advice contained within paragraph 5.8.4 of Planning Policy Wales (Edition to further promote energy efficiency and energy conservation, planning authoritied development plan policies requiring applications for major development to be accompanied by the proposal policies requiring applications for major development to be accompanied by the planning policies requiring applications for major development to be accompanied by the planning policies requiring applications for major development to be accompanied by the planning policies requiring applications for major development to be accompanied by the planning policies requiring applications for major development to be accompanied by the planning policies requires the properties of the planning policies process.

## he Council has undertaken a the current and future energy mands from local low carbon boundary has been subject to rgy project deployment from a wind energy, ground mounted tegrated solar pv.

se the use of local resources nd, strict policies have been egrate energy generation into stalled.

es to be net zero carbon in the Assessment identifies those electric-heating solutions in s a sequential approach that systems have been selected

Masterplan follows the advice es, "In order to further promote er including development plan ergy Report. This independent acy and appropriate renewable onse to that report from the insufficient consideration has ion". The proposal to increase As also confirmed by Welsh works directly align with Policy

oach to seeking more energy istainable in a wider sense in olicy objectives. ENT11 seeks achieve energy efficiency and e design standards are integral idered at the beginning of the ied by an Energy Masterplan ion 11), which states, "In order ties should consider including mpanied by an Energy Report.

			This independent report should include recommendations to the developer relatin appropriate renewable energy technologies that could be incorporated into the devel report from the developer should also accompany the application. If planning auth consideration has been given to energy issues in project design, they may refuse proposal to increase the threshold beyond 10 units is therefore not justified and not su by Welsh Government, Energy Masterplans for major developments and exploring H with Policy 16 (Future Wales). Further guidance on implementing the principles a ENT11 will be provided within a future Sustainable Construction and Design SPG.
170	Policy ENT10: and ENT11: require an Energy Masterplan for 'major development' which is defined by Welsh Government as 10 units or more. The HBF consider this is too low a threshold which will result in additional costs to SME developers. The relationship between the requirements of these policies and Building Regulations also needs to be carefully considered particularly with the upcoming changes to Part L of the Building regulations in 2022 and 2025.	Proposal to set a higher threshold within ENT10 and ENT11.	No action is considered necessary. The Council has an aspiration for all new homes first instance. The Bridgend Local Area Energy Strategy and Renewable Energy A areas considered to be suitable for development for district heat, hybrid and e combination with different levels of targeted fabric retrofit. Policy ENT10 outlines a requires new major development to demonstrate sustainable heating and cooling sy in the first instance, where technically feasible and financially viable. ENT11 continues the Council's current approach to seeking more energy efficient and development that is environmentally sustainable in a wider sense in order Objectives for the County Borough and national policy objectives. ENT11 seeks to standard of any new development is optimised to achieve energy efficiency an Development proposals must demonstrate that sustainable design standards are inte construction and operation, ensuring that they are considered at the beginning of the The requirement for new major development to be accompanied by an Energy Palications for major development to be accompanied by an Energy report should include recommendations to the developer relating to energy efficiency energy technologies that could be incorporated into the development. A respondevelopment, Energy Masterplans for major developments and exploring heat netword for future Wales). The proposal to increase the threshold beyond 10 units is the supported. Further guidance on implementing the principles and requirements set ou within a future Sustainable Construction and Design SPG.
221	Policy ENT10 (Low Carbon Heating Technologies for New Development) Persimmon Homes West Wales are committed to sustainable development. The current policy wording however requires preparation of an 'Energy Masterplan' for all new major developments. This policy approach differs to Future Wales: the National Plan (2040), which requires an 'Energy Masterplan' for large scale mixed- use developments of 100 or more dwellings	Proposal to set a higher threshold within ENT10	No action is considered necessary. The Council has an aspiration for all new homes first instance. The Bridgend Local Area Energy Strategy and Renewable Energy A areas considered to be suitable for development for district heat, hybrid and e combination with different levels of targeted fabric retrofit. Policy ENT10 outlines a requires new major development to demonstrate sustainable heating and cooling sy in the first instance, where technically feasible and financially viable. The requirement for new major development to be accompanied by an Energy Ma contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, energy efficiency and energy conservation, planning authorities should consider in policies requiring applications for major development to be accompanied by an Energy report should include recommendations to the developer relating to energy efficiency
	or 10,000 sqm or more commercial floorspace. As such, the current policy approach set out in the Deposit Plan is		energy technologies that could be incorporated into the development. A respon developer should also accompany the application. If planning authorities feel that in been given to energy issues in project design, they may refuse planning permission".

ting to energy efficiency and velopment. A response to that uthorities feel that insufficient se planning permission". The supported. As also confirmed g heat networks directly align and requirements set out in

es to be net zero carbon in the Assessment identifies those electric-heating solutions in s a sequential approach that systems have been selected

nt and lower carbon housing, er to achieve the Vision and to ensure that the design and and zero carbon emissions. Integral to the proposal through the design process.

Masterplan follows the advice es, "In order to further promote r including development plan ergy Report. This independent cy and appropriate renewable onse to that report from the insufficient consideration has i". As also confirmed by Welsh works directly align with Policy herefore not justified and not out in ENT11 will be provided

es to be net zero carbon in the Assessment identifies those electric-heating solutions in s a sequential approach that systems have been selected

Masterplan follows the advice es, "In order to further promote r including development plan ergy Report. This independent cy and appropriate renewable onse to that report from the insufficient consideration has a". As also confirmed by Welsh

	therefore clearly not in general conformance with the National Plan. The policy should be in line with the requirements of the National Plan unless evidence can be provided to demonstrate reasoned justification to support diverge. It is anticipated the intention of the policy is for major development to provide an Energy Statement, and therefore it is suggested the policy wording is amended to read: " New major development must: 1) Be accompanied by an 'Energy Masterplan' 'Energy Statement' that demonstrates the most sustainable heating and cooling systems have been selected"		Government, Energy Masterplans for major developments and exploring heat netwo 16 (Future Wales). The proposal to increase the threshold beyond 10 units is the supported. Future Wales does indeed state "Large scale mixed-use development should, win network with a renewable / low carbon or waste heat energy source. Planning applicat should prepare an Energy Masterplan to establish whether a heat network is the m option and, for feasible projects, a plan for its implementation." However, Future Wale potential for heat networks below this threshold and developers and planning author opportunities wherever possible. The design of new development should max accommodate a heat network. Particular consideration should be given to the form phasing of development" (p. 93). Overall, Future Wales' spatial strategy places a str to make the best use of our resources. Therefore, the Council does not agree with t that "the current policy approach set out in the Deposit Plan is therefore clearly not in the National Plan".
	Policy ENT11 (Energy Efficiency Provision within the Design of Buildings)For the same reasons set out in the commentary above relating to Policy ENT10, the policy wording relating to ENT11 is suggested should read: " New major development must be accompanied by an 'Energy Masterplan' 'Energy Statement' that demonstrates that the following principles have been incorporated"	Proposal to set a higher threshold within ENT11	No action is considered necessary. ENT11 continues the Council's current approa efficient and lower carbon housing, and development that is environmentally susta order to achieve the Vision and Objectives for the County Borough and national polit to ensure that the design and standard of any new development is optimised to ach zero carbon emissions. Development proposals must demonstrate that sustainable du to the proposal through construction and operation, ensuring that they are conside design process. The requirement for new major development to be accompanied follows the advice contained within paragraph 5.8.4 of Planning Policy Wales (Edition to further promote energy efficiency and energy conservation, planning authorities development plan policies requiring applications for major development to be accomp This independent report should include recommendations to the developer relatin appropriate renewable energy technologies that could be incorporated into the devel report from the developer should also accompany the application. If planning auth consideration has been given to energy issues in project design, they may refuse pla confirmed by Welsh Government, Energy Masterplans for major developments ar directly align with Policy 16 (Future Wales). The proposal to increase the threshold to not justified and not supported. Further guidance on implementing the principles a ENT11 will be provided within a future Sustainable Construction and Design SPG.
219	SP4: Mitigating the Impact of Climate Change This policy outlines how development should mitigate against the impact of climate change, listing seven means that this can be done. The second and fourth criteria encourages development to be "low/zero" carbon. There is a requirement for the wording to be amended so that it is clear that it is not setting a requirement for developments to be net zero carbon and instead to consider options for the use of	SP4: proposed change to policy wording: 2 <sup>nd</sup> and 4 <sup>th</sup> criterion.	word 'zero' under criteria 2 and 4. While the Council has an aspiration for all new ho

vorks directly align with Policy herefore not justified and not

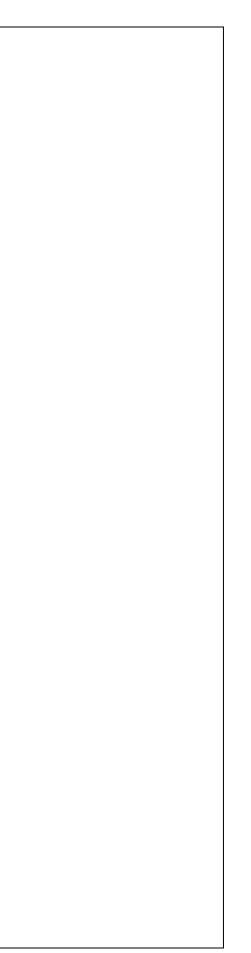
where feasible, have a heat ications for such development most effective energy supply ales also states, "there is also thorities should explore these aximise the opportunities to orm, density, mix of uses and strong emphasis on the need h the representor's statement t in general conformance with

bach to seeking more energy stainable in a wider sense in licy objectives. ENT11 seeks chieve energy efficiency and design standards are integral dered at the beginning of the ed by an Energy Masterplan on 11), which states, "In order ies should consider including npanied by an Energy Report. ting to energy efficiency and velopment. A response to that uthorities feel that insufficient planning permission". As also and exploring heat networks beyond 10 units is therefore and requirements set out in

unnecessary to strike out the homes to be net zero carbon ed on all future development nes a sequential approach for considered appropriate in the

erminology for Strategic and are unsubstantiated and not d to ensure more certainty for

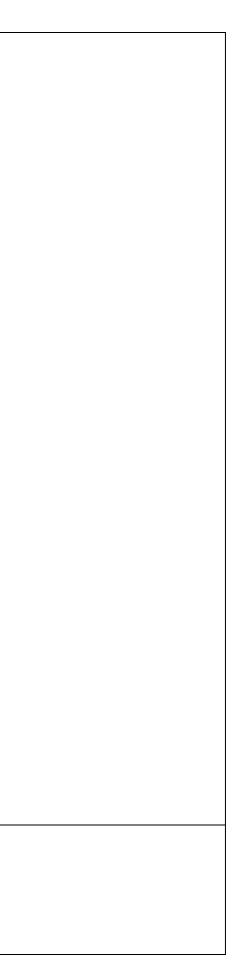
construction techniques that mitigate the impact of climate change.	
It is therefore suggested that this policy reads:	
"All development proposals must <b>should</b> make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change. Means of achieving this may include:	
1) Having a location and layout which reflects sustainable transport and access principles, thereby reducing the overall need to travel (active travel);	
<ol> <li>Having low / zero carbon energy requirements by reducing energy demand, and promoting energy efficiency;</li> </ol>	
3) Utilising low carbon, local materials and supplies (adopting circular economy principles);	
4) Encouraging the development of renewable and low / zero carbon energy generation;	
5) Having a design, layout and landscaping which: (i) helps wildlife and habitats to adapt to the changing climate; (ii) assists cooling of the urban environment, including the use of passive building techniques where appropriate;	
6) Using resources more efficiently, including averting waste generated from demolition and minimising waste water use and pollution;	
7) Directing development away from flood risk areas, and avoiding development that increases the risk of flood and coastal erosion, including through the deployment of sustainable urban drainage systems where relevant.	
All applications for development proposals must clearly demonstrate how they	



	contribute to climate change mitigation and adaption."		
	Changes sought: amend policy wording of SP4 as above.		
407	SP4: Mitigating the Impact of Climate Change This policy outlines how development should mitigate against the impact of climate change, listing seven means that this can be done. The second and fourth criteria encourages development to be "low/zero" carbon. There is a requirement for the wording to be amended so that it is clear that it is not setting a requirement for developments to be net zero carbon and instead to consider options for the use of construction techniques that mitigate the impact of climate change. It is therefore suggested that this policy reads: "All development proposals mustshould make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change. Means of achieving this may include: 1) Having a location and layout which reflects sustainable transport and access principles, thereby reducing the overall need to travel (active travel); 2) Having low / zero carbon energy requirements by reducing energy demand, and promoting energy efficiency; 3) Utilising low carbon, local materials and supplies (adopting circular economy principles); 4) Encouraging the development of renewable and low/zero carbon energy generation; 5) Having a design, layout and landscaping which: (i) helps wildlife and habitats to adapt to the changing climate; (ii) assists cooling of the urban environment, including the use of passive building techniques where appropriate; 6) Using resources more efficiently, including averting waste generated from demolition and minimising waste water use and pollution; 7) Directing development away from flood risk areas, and avoiding development that increases the risk of flood and coastal erosion, including through the deployment of	SP4: proposed change to policy wording: 2 <sup>nd</sup> and 4 <sup>th</sup> criterion.	In response to the representor's proposed changes to Policy SP4, it is considered u word 'zero' under criteria 2 and 4. While the Council has an aspiration for all new h in the first instance, Policy SP4 does acknowledge that this may not be achieved hence the use of the word 'low' to ensure flexibility. In addition, Policy ENT10 outline low carbon heating technologies in new development. Therefore, Policy SP4 is co current form.

d unnecessary to strike out the w homes to be net zero carbon ved on all future development lines a sequential approach for considered appropriate in the

	sustainable urban drainage systems where		
	relevant. All applications for development		
	proposals must clearly demonstrate how		
	they contribute to climate change mitigation		
	and adaption." Changes sought: amend		
	policy wording of SP4 as above.		
	It is therefore suggested that this policy		
	reads: "All development proposals must		
	should make a positive contribution towards		
	tackling the causes of, and adapting to the		
	impacts of Climate Change. Means of		
	achieving this may include: 1) Having a		
	location and layout which reflects		
	sustainable transport and access principles,		
	thereby reducing the overall need to travel		
	(active travel); 2) Having low / zero carbon		
	energy requirements by reducing energy		
	demand, and promoting energy efficiency;		
	3) Utilising low carbon, local materials and		
	supplies (adopting circular economy		
	principles); 4) Encouraging the		
	development of renewable and low/zero		
	carbon energy generation; 5) Having a		
	design, layout and landscaping which: (i)		
	helps wildlife and habitats to adapt to the		
	changing climate; (ii) assists cooling of the		
	urban environment, including the use of		
	passive building techniques where		
	appropriate; 6) Using resources more		
	efficiently, including averting waste		
	generated from demolition and minimising		
	waste water use and pollution; 7) Directing		
	development away from flood risk areas,		
	and avoiding development that increases		
	the risk of flood and coastal erosion,		
	including through the deployment of		
	sustainable urban drainage systems where		
	relevant. All applications for development		
	proposals must clearly demonstrate how		
	they contribute to climate change mitigation		
	and adaption."		
104	Renewable Energy Systems Ltd (RES) is		
9	the world's largest independent renewable		
	energy company active in onshore and		
	offshore wind, solar, energy storage and		
	transmission and distribution. A British		
	company, headquartered in the UK and at		
	the forefront of the industry for almost 40		
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		-
years, RES has delivered more than 21GW of renewable energy projects across the globe and supports an operational asset portfolio exceeding 10GW worldwide for a large client base. From our local office in Cardiff, RES has been at the forefront of wind farm development in Wales since the early 1990s and has developed a number of projects across the country.		
As a company actively promoting renewable energy projects throughout Wales, and indeed having a current Development of National Significance project inside Bridgend CBC, is concerned about the rationale, evidence base, policy interpretation and policy wording in respect of renewable energy projects in the County. As such it submits formal objections to a number of policies and supporting text in the Deposit Draft for consultation (DD) in this consultation stage. RES has examined the Renewable Energy Assessment (REA), to which reference is made on a number of occasions in the DD and on which reliance is placed by the Council at various stages for its policy formulation and target setting. It is necessary for RES to refer where necessary to this document in the formulation of its objections.	Concern raised over the Renewable Energy Assessment (REA).	PPW places a requirement on planning authorities to develop an evidence base to renewable energy and low carbon energy policies. The Welsh Government's Pract Renewable and Low Carbon Energy – A Toolkit for Planners, September 2015, "the T 2015) is identified within PPW as it provides a methodology for developing an evider based renewable energy policies for inclusion within Local Development Plans (LDP The Council recognises that it has a significant role to play. Previous work that the Systems Catapult (ESC) undertook forms an integral part of the evidence base, Energy Assessment. This Assessment has been informed and guided by the Toolkit, been updated to account for the local and temporal context of the Bridgend Local Dev where appropriate. The Assessment estimates the current and future energy demar along with the progress in meeting these demands from local low carbon energy gen backdrop, land within the County Borough boundary has been subject to a resource potential for renewable and low carbon energy project deployment from a resource technologies have been considered: • Wind energy; • Ground mounted solar PV; • from waste; • Hydropower energy; and • Buildings integrated solar PV. 5.4.80 Prev with the Council under the Smart Systems and Heat programme (ETI, 2018b, E potential for low carbon heating within the County Borough. This was drawn on to inf potential and opportunities. The potential resource available has been compared w demands and it is considered unlikely that all of Bridgend County Borough's future estimates of deploying the level of ground mounted solar PV potential identifit Therefore additional energy generated in other parts of the country and offshore w Renewable Energy Assessment was prepared by the Carbon Trust to underpit Development Plan and has been signed off by Welsh Government and is considered to base its renewable energy policies.
The first key point is that under LS3 – under key environmental issues – there is the statement that there is a need to consider the increasing development pressure for wind farms in Valleys areas in the context of appropriate siting and design to minimise visual impacts on scenic landscapes. This seems to reflect some of the stakeholder comments in the REA about the Valleys having had more than their fair share of wind energy – and that was before the	Objection: reference should be made to Future Wales Pre- assessed Areas (PAA) under National /Regional issue NR5. Objection: reference should	NR5 – references Future Wales / National Development Framework. Therefore, NRs in the current form. Agreed LS3 should reference Future Wales / National Development Framework.
	of renewable energy projects across the globe and supports an operational asset portfolio exceeding 10GW worldwide for a large client base. From our local office in Cardiff, RES has been at the forefront of wind farm development in Wales since the early 1990s and has developed a number of projects across the country. As a company actively promoting renewable energy projects throughout Wales, and indeed having a current Development of National Significance project inside Bridgend CBC, is concerned about the rationale, evidence base, policy interpretation and policy wording in respect of renewable energy projects in the County. As such it submits formal objections to a number of policies and supporting text in the Deposit Draft for consultation (DD) in this consultation stage. RES has examined the Renewable Energy Assessment (REA), to which reference is made on a number of occasions in the DD and on which reliance is placed by the Council at various stages for its policy formulation and target setting. It is necessary for RES to refer where necessary to this document in the formulation of its objections.	of renewable energy projects across the globe and supports an operational asset portfolio exceeding 10GW worldwide for a large client base. From our local office in Cardiff, RES has been at the forefront of wind farm development in Wales since the early 1990s and has developed a number of projects across the country.Concern raised over the Renewable Energy projects in thoughout Wales, and indeed having a current Development of National Significance project inside Bridgend CBC, is concerned about the rationale, evidence base, policy interpretation and policy wording in respect of renewable energy projects in the County. As such it submits formal objections to a number of policies and supporting text in the Deposit Draft for consultation (DD) in this consultation stage. RES has examined the Renewable Energy Assessment (REA), to which reference is made on a number of occasions in the DD and on which reliance is placed by the Council at various stages for its policy formulation and target setting. It is necessary for RES to refer where necessary to this document in the formulation of its objections.Objection: reference should be made to Future Wales Pre- assessed Areas (PAA) under National /Regional issue Impacts on scenic landscapes. This seems to reflect some of the stakeholder comments in the REA about the Valleys having had more than their fair share ofObjection:

to inform the development of actice Guidance: Planning for a Toolkit" (Welsh Government, dence base to inform spatially DP).

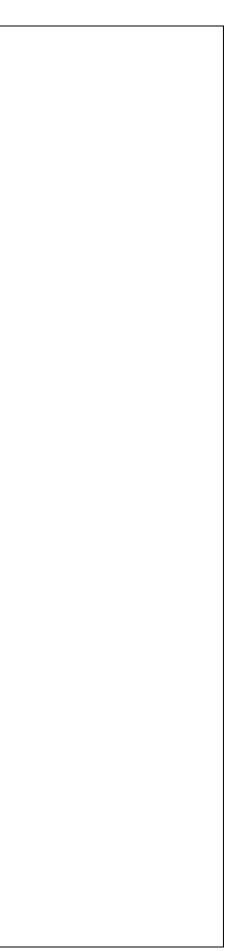
the Council and the Energy e, along with the Renewable kit, although the methods have Development Plan 2018-2033, nands of the County Borough, eneration assets. Against this ce assessment to identify the ce perspective. The following • Biomass energy; • Energy revious work was undertaken ESC, 2018b) relating to the inform the low carbon heating I with projected future energy e energy needs will be able to Borough. This is due to the tified within the Assessment. will also be relied upon. The rpin the Replacement Local ed a 'sound' platform on which

IR5 is considered appropriate

Assessed Areas (PAAs) were devised	Wales and Pre-	
bringing development much closer to them.	Assessed Areas	
Already by this point in 2.6.5 there is	(PAA) under	
reference a couple of pages earlier	Environmental	
identifying Future Wales as a key driver of	issue LS3 –.	
policy, but without referring to its key role for		
national and local planning policy of the		
PAAs, or indeed the fact that Future Wales		
is now part of the statutory development		
plan at a higher level than the LDP. Nor is		
there any reference to the PAAs in NR5 on		
renewable energy, although there is a		
cross-reference to the REA. RES suspects		
that these only partial references to the		
most important change in Welsh planning		
on renewable energy for at least 16 years		
reflect the fact that the REA was being		
prepared while the ARUP Studies for Future		
Wales were emerging and that the REA was		
finalised at a time when Future Wales still		
contained an approach of Priority Areas for		
wind and solar rather than the final version		
early in 2021 when the PAAs were		
confirmed.		
Policy SP3 on page 60 identifies the need	Objection to	The proposed change is rejected as the Bridgend RLDP does not seek to make an
to respond to the climate emergency by	para's 5.4.80 but	in Future Wales / National Development Framework. The RLDP will identify the PA
maximising opportunities for renewable and	in 5.4.81.	
low carbon energy generation, which sits	Reference should	
rather uncomfortably with the REA and its	be made to	
reduction in the potential for wind in the	Planning Policy	
unrealistic hope that the loss of potential	Wales that makes	
wind energy can be made up by more	it clear at 5.9.18	
reliance on solar.	that Councils	
In the section on renewable energy from	should take the	
page 155, it can be seen that the Council	PAAs directly into	
has followed the REA view that it was	their new	
unlikely that the Council could reach its	development	
target of meeting all its energy demands	plans without	
from renewable and low carbon sources	amendment. It is	
due to the impracticalities of deploying solar	important for the	
panels in large enough numbers - and	LDP to make this	
hence it would have to rely on electricity	point explicitly	
generated in other parts of the country and	clear by setting	
offshore to meet the shortfall. This is in	out that the PAAs	
5.4.80 but in 5.4.81 they go on to say that	in Future Wales	
"with this in mind" they have set ambitious	are carried	
renewable energy development targets to	forward directly	
maximise local resources. That is a non-	without any	
	without any changes into their	

any amendments to the PAAs PAAs.

just does not sit comfortably with the	LDP Proposals	
preceding paragraph and indeed the details	Map.	
of the REA. If you have identified a large	- 1	
onshore wind resource through the REA,		
and you basically need every MW that you		
can deliver if you are to approach the 2033		
targets of meeting all your energy needs		
from renewable and low carbon sources,		
then "ambitious" renewable energy targets		
should mean just that and not the approach		
taken here. The Council has clear evidence		
from Government that it is to host extensive		
areas which on landscape grounds are		
deemed suitable for large-scale		
development, but as regards the remainder		
of their area their whole approach to		
landscape sensitivity essentially puts all but		
two of their LCAs into the highest possible		
category of sensitivity – a stance that ARUP		
and Future Wales do not accept is a bar to		
development. The fact that Landscape		
Character Area 6 which has a large slice		
inside PAA9 in Future Wales is also a		
Special Landscape Area on their current		
LDP shows that their overall approach to		
defining wind farm search areas is		
unrealistic in the context of a major shortfall		
overall of deliverable capacity. The REA		
suggested at Section 8.2.2 on Page 109		
that given councils were allowed to refine		
the SSA under TAN8 it was likely to be		
worth the Council considering a similar		
exercise for the new PAAs. In reality that		
cannot happen since PPWales makes it		
clear at 5.9.18 that Councils should take the		
PAAs directly into their new development		
plans without amendment. It is important for		
the LDP to make this point explicitly clear by		
setting out that the PAAs in Future Wales		
are carried forward directly without any		
changes into their LDP Proposals Map.		
changes into their EDF i Toposais map.		
RES now turns to SP13 which is the	Objection to	Appropriate amendments will be made to SP13.
renewable and low carbon energy policy.	Policy SP13:	
Here the key tests are what proposal this	proposed change	
policy is aimed at. The REA took the view	to criteria b).	
that DNS applications inside the PAAs		
would be determined under Policy 17 and		
18 of Future Wales as it has now been		
finalised, and that it would be applications		



<ul> <li>below the 10MW limit which the Review of the LDP would be addressing. However, Criterion (b) in SP13 is a real problem for any application that comes forward inside the PAAs but is for less than 10MW. This is perfectly feasible, the only real policy issue being raised is as to whether a small scheme in the PAA might prejudice the consenting and implementation of a much larger scheme. However for the purposes of the LDP Review, it is a fact that any application under 10MW would be dealt with under the planning acts through an application to the Council rather than the Planning Inspectorate. While Policies 17 and 18 of Future Wales would still apply, the Council would seek to apply SP13 alongside, and here a developer is expected to mitigate the landscape and visual effects of a scheme. How a developer could be expected to "mitigate" the effects of say a 150m turbine is a serious issue that the policy cannot seriously accommodate. It has been a reality for the last thirty years that wind turbines are highly unlikely to be argued as being neutral or a landscape enhancement, and therefore this begs the question as to how one might even start to mitigate the effects. Future Wales and PPWales refer to seeking to minimise the effects which is a far more sensible term.</li> <li>SP13 in fact conflicts with Future Wales Policy 17 in that a small scheme inside the PAA has already received the benefit of a presumption in favour of approval as regards its potential landscape effects, and yet SP13 1(b) would still as a matter of fact be applicable against it. The policy should make it clear how Future Wales treats the landscape effects for a sub 10MW</li> </ul>	Objection: SP13 conflicts with Future Wales / National Development Framework.	will be required to undertake a landscape and Visual Impact Assessment. Para 5.4 supporting development management policies) will assist the County Borough a decentralised energy system that works for its individuals, communities and b renewable and low and zero carbon energy projects. SP13 outlines the criteria aga Local Authority-wide scale will be assessed. Only proposals (outside the PAAs) significant impact on the landscape and/or visual amenity will be required to undertal Impact Assessment and other relevant technical assessments to identify like
Policy 17 in that a small scheme inside the PAA has already received the benefit of a presumption in favour of approval as regards its potential landscape effects, and yet SP13 1(b) would still as a matter of fact be applicable against it. The policy should	conflicts with Future Wales / National Development	For the avoidance of doubt, Para 5.4.85 has been amended to clarify that only pro- will be required to undertake a landscape and Visual Impact Assessment. Para 5.4 supporting development management policies) will assist the County Borough to decentralised energy system that works for its individuals, communities and be renewable and low and zero carbon energy projects. SP13 outlines the criteria aga Local Authority-wide scale will be assessed. Only proposals (outside the PAAs) significant impact on the landscape and/or visual amenity will be required to undertal Impact Assessment and other relevant technical assessments to identify like demonstrate that adequate mitigation has been incorporated into the development'.
The second part of SP13 relates to the three Local Search Areas that have come forward from the REA and only two are for wind – namely the only two LCAs that are only moderate to high in sensitivity terms for the largest scale turbines. That is of course already undermined by the PAAs in Future		

proposals outside of the PAAs 5.4.85 now reads 'SP13 (and the transition to a low carbon, d businesses by encouraging against which proposals up to As) which are likely to have a pertake a Landscape and Visual likely significant effects and nt'. Wales which do not neatly conform to the LCAs that the Council has accepted from their REA as the only two Search Areas in their new Plan. The use of Landscape Character Areas' sensitivity as effectively the sole determinant of suitable areas for wind farms is thus flawed from the outset, and also highlighted by the fact that Llynfi Afan, which neighbours the Upper Ogmore Wind Farm DNS was allowed on appeal in Neath Port Talbot in a landscape character type effectively identical to the LCA6 in which Upper Ogmore sits. The text supporting SP13 also goes on to

state that Future Wales asserts that communities will be protected from significant cumulative impacts to avoid unacceptable situations such as settlement being surrounded by large wind schemes. However, this appears to be a reference to visual effects, because the cumulative landscape impacts of a wind farm inside a PAA have already been assessed by ARUP and hence the reason why the former Strategic Search Areas under TAN8 have been markedly altered to exclude areas which have, under TAN8, seen major developments already. That is why the site of Pen y Cymoedd inside TAN8 Area F is now outside PAA9. Indeed, what Policy 18 in Future Wales does refer to is that "The cumulative impacts of existing and consented renewable energy schemes should also be considered" in the context of all the relevant criteria in Policy 18 as opposed to the landscape impacts for the PAAs which are covered under Policy 17 with no reference to cumulative landscape impacts. The first criterion of Policy 18 indeed states that landscape impacts are to be assessed on wind farm proposals on land which sits outside the PAAs so that there are no unacceptable impacts. One area of omission is in 5.4.85 where it states that SP13 deals with all applications below the 10MW level for wind farm, and here there is a factual error. It states that for such projects, a full landscape assessment will be required to identify and mitigate against the landscape (and visual) effects of



	such a development. If you are in a PAA and proposed a scheme below 10MW you will be assessed against Future Wales and		
	SP13, but you are still entitled to rely on the		
	ARUP studies and the 6 presumption in favour of a wind farm inside a PAA. A		
	requirement here to assess and mitigate		
	against the landscape effects runs counter		
	to Future Wales Policy requirements and so		
	is not tenable for a site inside the PAA.		
	It is far from clear in the DD how the Council	Objection: table	The REA has been carried out in accordance with the REA toolkit – no change is co
	thinks that PAA developments will	10 is unclear in	
	contribute towards its own County target.	relation to its	
	Realistically, if the Y Bryn project between	proposed targets.	
	the Afan and Llynfi valleys on forestry land		
	for around 50MW (possibly half in Bridgend)		
	does come to fruition, then that would be		
	25MW towards their target. If the Upper		
	Ogmore DNS scheme now at a hearing also received consent then that would be		
	another 25MW. That is more than half way		
	towards their eventual 81MW target in		
	Table 10 of the Plan – reached by diluting		
	the 174MW the REA saw as potential		
	(which included 64MW of existing capacity)		
	and trying to offset that loss by putting it into		
	solar where the Council seems seem to		
	think that in just 12 years it will get solar from about 13MW to 218MW from a		
	resource they believe is potentially as much		
	as 3835MW. The use of the term DNS for		
	wind farms over 10MW does not mean that		
	this is somehow moved out of the ambit of		
	local target setting, and indeed it is clear		
	that in the REA there are certain areas		
	which are now in the PAAs (although they		
	were called Priority Areas at the time of the		
	REA being prepared) and the potential capacity of each of these is identified in the		
	REAs, including the site of Upper Ogmore.		
	A further note of caution is a point that		
	needs to be formally clarified in Table 10		
	where the wording of all the text and tables		
	is far from clear as to whether the figures for		
	"targets" are indeed for extra capacity over		
	and above the figure for commitments in the		
	middle row in Table 10 or actually the much		
Ĺ	lower figure of a final target including the		

considered necessary.

_			
	64MW specified there. It has been assumed		
	as a matter of common sense that the LDP		
	targets are indeed for further capacity over and above the middle column.		
	SP17 refers to denying consent where	Objection: SP17	All polices are inter-related in their nature and need to be read in conjunction with o
	development will have an adverse impact		an understanding of the overall policy direction of the Replacement LDP, therefor
	on the character of the landscape, and		considered unnecessary.
	development in the countryside under		
	DNP4 will only be permitted where it retains		
	or enhances the character and		
	distinctiveness of an SLA. It is evident from		
	the ARUP Reports that they took into		
	account the presence of SLA designations		
	in defining the PAAs, but under SP17 and		
	DNP4 it would be feasible for the Council to		
	seek to reject a wind farm below 10MW		
	inside the PAA on the basis of both these		
	policies, which would again conflict with the		
	aims of Future Wales. Indeed one can go		
	further and suggest that for any wind farm		
	inside 7 LCAs 1 and 8 it would be difficult to		
	meet the requirements of DNP4 and if any		
	part of them lies inside the SLA that would		
	also be the case for SP17. Achieving even		
	the very modest targets in Table 10 could		
	be compromised if this were the case, and		
	certainly as far as the issue of the SLA is		
	concerned there are numerous examples in		
	the area around Bridgend CBC where		
	consents have been given either locally or		
	more critically on appeal where the wind		
	farm site lay within an SLA. Indeed, Llynfi		
	Afan was consented on appeal in 2013 in an		
	area which was proposed to become an		
	SLA in the emerging Neath Port Talbot		
	LDP, and even despite its permission the		
	Council went on to confirm the designation		
	in the final version of their plan.		
L			

# h one another in order to gain fore, the proposed change is

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
82	Policy DNP8 (Green Infrastructure) requires all major developments to submit a Green Infrastructure Assessment. BDW would like clarification of whether this would apply to developments over 10 units (as per WG definition) and if so, it is suggested that a higher threshold should be used. Further clarification is required on what level of bio- diversity net gain is required.	Proposal to set a higher threshold within DNP8	Policy DNP8 seeks to ensure that Bridgend's green infrastructure assets are valued managed through a green infrastructure network. DNP8 clearly states that all n required to submit a Green Infrastructure Assessment. Major developments are devunits or more. Such schemes will need to be designed to take into account the eassets to ensure no fragmentation or loss of connectivity whilst maximising ecosystel services. As such, the proposal to apply these requirements to sites of a larger threshold guidance on Green Infrastructure as part of development will be prepared as Suppler in support of the sustainable placemaking and the creation of high quality and biodiverses.
717	There is not enough detail of the green space that will be set aside in each development	Lack of detail setting out amount of green space within proposed development	Comments noted. In terms of Strategic Development Sites, Policies PLA1-PL requirements including masterplan development principles and development require will ensure that sites retain and provide suitable buffers to habitats, particularly h Ancient and/or Semi-Ancient Woodland), and SINCs. Additionally, green infrastruct facilities will be required to be delivered in accordance with Policy COM10 and Outdown New Housing Development Supplementary Planning Guidance.
516	If you want to enhance and protect the natural landscape of BCB, get rid of Natural Resource Wales and their mindless barbaric forestry practices here in the Garw Valley. There could be ample local employment in forestry here but all we get is destructive clear-cutting of immature trees by external contractors who couldn't care less about the mess they leave behind. This is not "sustainable economic growth" but unsustainable economic destruction.	Concerns regarding Natural Resources Wales	Comments noted. The Council will feed comments back to Natural Resour acknowledges that the County Borough has a rich and varied biodiversity with a broa and unique, rich landscapes. Policies within the Deposit Plan have been refreshed ar LDP and will continue to protect the county borough's environment in line with natic Environment Act 2016. These policies cover development in the countryside, spec regional nature conservation sites, trees, hedgerows and development, green infrastr and natural resources protection and public health.
707	The general content of this subject appears to be sound but again - the clash between preserving scenic areas and building everywhere provides a contradiction. Development needs great thought. I do not know the Bridgend area too well even though I've lived in Porthcawl for over 30 years. Working overseas and coming home to be a full time carer has prevented me from exploring my surroundings. What I do know about is Porthcawl, which I rarely have the chance to wander away from, and in my conversations with locals and tourists at the seafront, when having a beverage, is that they all tend to agree that filling the	Concerns regarding parking in Porthcawl	Comments noted. In terms of car parking, it's acknowledged that a sound and rob critical to the success of the regeneration. As part of the strategy, the site will accon car park on the existing Hillsboro car par enabling more ground floor space to be giv development. Consideration should be given to alternative future uses as, overtime, to Porthcawl Waterfront will be principally by public transport including park and ride the number of private vehicles requiring parking facilities. Consultations confirmed concept of a multi storey car park whilst recognising it will change the immediat Hillsboro Place. The authority has a strong desire to facilitate and actively encourage a modal shift 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 Por as a boulevard where visitors and locals could arrive at, and depart from the regene The location of the bus terminus will enable access towards the waterfront and also the also undertaken feasibility work to explore proposals to deliver a bus terminus terminus is to bus terminus.

ued, protected, enhanced and major developments will be evelopments of 10 residential e existing green infrastructure tem resilience and ecosystem shold is not supported. Further lementary Planning Guidance diverse living environments.

PLA5 detail the site specific uirements. Such requirements hedgerows, trees (including ucture and outdoor recreation door Recreation Facilities and

endix 37). The IDP provides a nt of allocated sites for the d could not proceed. The IDP

urces Wales. The Strategy oad range of species, habitats and updated from the existing tional planning policy and the ecial landscape areas, local / structure, nature conservation

obust parking strategy will be ommodate a new multi storey given over to public realm and ne, the aspiration is that travel de schemes, greatly reducing ed widespread support for the liate outlook of properties on

hift towards increased use of ell as being part of the wider Portway of which will function neration site and town centre. the town centre. The Council erminus within the Porthcawl

	parking area at Salt Lake with houses/shops/supermarket would be a very bad move for the town given its tourism appeal. The comments I've heard is that it would deter people from visiting if they could not rely on easy parking. Both the old and the young use the parking availability to enjoy the fair, the rocks, the beach, the water, the prom and the dining venues. Remove the parking, the visitors will go elsewhere.		regeneration area. The bus terminus project is being brought forward in connection Metro Plus project and is seen as a key element of the wider regeneration plans.
847	No	No changes proposed	Comments noted.
996	Removing natural environment to provide additional housing is a contradiction of this policy.	Removing natural environment to provide additional housing is a contradiction of this policy	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 ide requirement to enable a balanced level of housing and employment provision th patterns of growth, support existing settlements and maximise viable affordable hour. The distribution of growth is further evaluated and justified in the Spatial Strategy (See Appendix 43 – Background Paper 3). The strategy prioritises the developme 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 throe 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. Howevy 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 services, facilities and employment opportunities and are most conducive to development. As such, a Settlement of Pyle, Kenfig Hill and North Cornelly. The plan preparation has involved the assessment for 171 sites. Each candidate site the criteria in the Candidate Site Assessment Methodology which was previously corn 13 – Candidate Site Assessment Report (2020)). During Stage 2 detailed assessib based on any specific is

## on with Cardiff Capital Region

the most appropriate scale of ell informed, evidence based ackground Paper 2: Preferred ole Replacement LDP period nd 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, 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 ement SP1, deliver affordable irrements can be realised.

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

te has been assessed against consulted upon (See Appendix ssment, sites were examined ation, neighbouring land uses, opportunities. Site promoters es to demonstrate the site's

			deliverability, sustainability and suitability. Proceeding this detailed assessment, appropriate were included for allocation in the Deposit Plan.
			In terms of allocated Strategic Development Sites, Policies PLA1-PLA5 detail the including masterplan development principles and development requirements. Such resistes retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Model and), and SINCs. Additionally, green infrastructure and outdoor recreated to be delivered in accordance with Policy COM10 and Outdoor Recreation Facebook Development Supplementary Planning Guidance.
329	yes i agree must keep some character of the surrounded area ,but also allowing adoption of houses that can adapt a design to compliment the surrounding area that meet other criteria and allowing to extend areas that and close to unban Areas	Ensure development compliments surrounding areas	Comments noted. The distribution of growth is evaluated and justified in the Spatial St Paper (See Appendix 43 – Background Paper 3). The strategy priorities the develue the periphery of sustainable urban areas, primarily on previously developed brownfiel 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 Wa developmental pressure on Best and Most Versatile (BMV) agricultural land. Howev success in delivering development on brownfield land in other settlements (notably Gateway), there are limited further brownfield regeneration opportunities remained leverable sites (including some greenfield sites) are therefore required to implem housing in high need areas and ensure the County Borough's future housing require services, facilities and employment opportunities and are most conducive to a development. As such, a Settlement Assessment has been undertaken (See Af sustainable settlement hierarchy. Based upon the consideration of a compreh sustainable growth will be appropriately directed towards the Main Settlements of Br with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly. Furthermore, the Council has reviewed all settlement boundaries within the County B are still appropriate in light of the Replacement LDP Strategy and / or would constitut to existing boundaries. This review (See Appendix 38) has informed settlement bor Replacement LDP. Development will be required to contribute to creating high quiplaces that support active and healthy lives and enhanced. There is a presumption countryside and only in exceptional circumstances will development to the sceptable. In terms of design, all development will be required to contribute to creating high quiplaces that support active and healthy lives and enhance the community in which

it, only those sites deemed

ne site specific requirements requirements will ensure that including Ancient and/or Semitation facilities will be required Facilities and New Housing

Strategy Options Background elopment of land within or on eld sites. It continues to focus ting LDP, hence, Porthcawl, nrough their designation as ent opportunities within these Vales and seeks to minimise ever, given the existing LDP's oly Bridgend and the Valleys aining. Additional viable and ment SP1, deliver affordable irements can be realised.

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

P Borough to determine if they sute appropriate amendments boundaries within the Deposit ttlement boundaries and into Countryside (alongside other Policy DNP1 will ensure that n against development in the e.

quality, attractive, sustainable hey are located, whilst having Policy 3: Good Design and successful delivery of the ontext in terms of size, scale, nd density.

d-use Strategic Development eek to contribute and address preparation process. A key her densities at key points in

108 5	This objective is simply not met if the proposed development between Laleston and bryntirion goes ahead.	Concerns relating to loss of green space.	The Deposit Plan has been underpinned through the identification of the most app growth and housing provision, all of which have been based upon well informed, e regarding need, demand and supply factors (See Appendix 42 – Background P Strategic Growth Options). A range of growth scenarios across the whole Replacer analysed and discussed within the Strategic Growth Options Background Paper. T County Borough's demographic situation is likely to change from 2018-2033 and inf response for the Replacement LDP. As such the Replacement LDP identifies an ap 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 (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 thr 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 requires The Replacement LDP apportions sustainable growth towards settlements that alres services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment has been undertaken (See A sustainable growth will be appropriately directed towards the Main Settlements of B with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
			The plan preparation has involved the assessment of 171 sites, the vast majority of candidate site has been assessed against the criteria in the Candidate Site Assessment previously consulted upon (See Appendix 13 – Candidate Sites Assessment Rep detailed assessment, sites were examined based on any specific issues the deliverability, general location, neighbouring land uses, existing use(s), access environmental constraints and opportunities. Site promoters were asked to prepart technical supporting studies to demonstrate the site's deliverability, sustainability and detailed assessment, only those sites deemed appropriate were included for allocation.
			As part of the proposed allocation of Land West of Bridgend, development will requirements including a range of placemaking principles and masterplan developm Policy PLA3 – Page 71). Green Infrastructure and Outdoor Recreation Facilities will in accordance with Policy COM10 and Outdoor Recreation Facilities and N Supplementary Planning Guidance. The proposed allocation will also be required to corridor between the site and Laleston to retain the separate identities and characte preventing coalescence.
874	Proposed Policy DNP6 relates to Biodiversity, Ecological Networks, Habitats and Species. The policy wording itself states that "All development proposals must contribute to biodiversity net gain and		The supporting text to Policy DNP6 promotes a range of opportunities identified Biodiversity Action Plan (see Appendix 33) that development proposals must see biodiversity net gain or ecological enhancement. The measures identified in the bu order or ranked as to their importance. The proposed change to the policy wordir measures and elevate it to be included in the policy itself. This would give the impress

ppropriate scale of economic evidence based judgements Paper 2: Preferred Strategy ement LDP period have been This has considered how the nformed 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 ement SP1, deliver affordable irements can be realised.

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

of which are greenfield. Each ment Methodology which was eport (2020)). During Stage 2 ney raised in terms of their essibility, physical character, pare and submit a number of and suitability. Proceeding this ration in the Deposit Plan.

vill be subject to site-specific oment principles (See Deposit vill be required to be delivered New Housing Development to maintain a strategic green ter of these settlements whilst

ified within the BCBC Local eek to implement to achieve oullet points are not in priority ding would extract one of the ession of being more important

	<i>improved ecosystem resilience, as demonstrated through planning application submissions."</i> The supporting text states (5.5.39 and 5.5.40) that Development proposals must achieve biodiversity net gain or ecological enhancement through implementing a range of opportunities as identified within the Action Plan. These include promoting recreation linkages, allowing interactions between the population and open areas; and promoting recreation and enjoyment of nature through green infrastructure networks, active travel, signage and raising awareness of local biodiversity. We believe that the policy should reflect the supporting text in promoting recreation linkages and promoting recreation linkages and promoting active travel. We therefore suggest that the policy reads:	"All development proposals must contribute to biodiversity net gain and improved ecosystem resilience or ecological enhancement, including promoting recreation linkages, recreation and enjoyment of nature including through green infrastructure networks and active travel, as demonstrated	than the other measures listed. Similarly, to include all measures in the policy wor too unwieldy. For this reason, the proposed change is not considered necessary.
	"All development proposals must contribute to biodiversity net gain and improved ecosystem resilience or ecological enhancement, including promoting recreation linkages, recreation and enjoyment of nature including through green infrastructure networks and active travel, as demonstrated through planning application submissions"	through planning application submissions"	
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	Policy SP18: Conservation of the Historic Environment The policy states that there is a general presumption in favour of the preservation or enhancement of the significance of historic assets and their settings (including Archaeologically Sensitive Areas and Archaeological Remains). The Proposals Map confirms that parts of Bridgend Town Centre are designated as 'Sites or Areas of Archaeological Significance'. This includes part of the Southside regeneration area. In such cases it is important that Policy SP18 allows sufficient flexibility for any future regeneration proposals to carefully consider archaeology as part of the design process,	Concerns regarding flexibility of Policy SP18	Comments noted. Any future planning proposals affecting a site or Area of Archaeole to demonstrate compliance with Policy SP18 and the supporting development supporting text to the policy at paragraph 5.5.92 is quite clear of the need for high sited development that is both in keeping and scale with its location, and which is a the historic built and natural environment. More often a heritage asset and its setting p where the restoration, incorporation and sustainable reuse of historic buildings or f local identity (respecting local design characteristics) and the sense of place to the and businesses.

vording would make the policy

eological Significance will need nt management policies. The gh quality design and carefully is sensitive to the character of ng present a design opportunity or features helps to strengthen he benefit of local communities

rather than necessarily requiring preservation/enhancement in situ.		
I agree that things should be looked after	No changes proposed	Comments noted
No		Comments noted
Policy DNP8 (Green Infrastructure) requires all major developments to submit a Green Infrastructure Assessment. BDW would like clarification of whether this would apply to developments over 10 units (as per WG definition) and if so, it is suggested that a higher threshold should be used. Further clarification is required on what level of bio- diversity net gain is required.	Proposal to set a higher threshold within DNP8	No action is considered necessary. Policy DNP8 seeks to ensure that Bridgend's gre valued, protected, enhanced and managed through a green infrastructure network. major developments will be required to submit a Green Infrastructure Assessmen developments of 10 residential units or more. Such schemes will need to be design existing green infrastructure assets to ensure no fragmentation or loss of com ecosystem resilience and ecosystem services. As such, the proposal to apply these larger threshold is not supported. Further guidance on Green Infrastructure as p prepared as Supplementary Planning Guidance in support of the sustainable place high quality and biodiverse living environments.
Policy DNP8: requires the submission of a Green Infrastructure Assessment for all major developments over 10 units, the HBF suggests a higher threshold to avoid SME developers being unduly burdened.	Proposal to set a higher threshold within ENT8.	No action is considered necessary. Policy DNP8 seeks to ensure that Bridgend's grevalued, protected, enhanced and managed through a green infrastructure network. major developments will be required to submit a Green Infrastructure Assessment developments of 10 residential units or more. Such schemes will need to be design existing green infrastructure assets to ensure no fragmentation or loss of content ecosystem resilience and ecosystem services. As such, the proposal to apply these larger threshold is not supported. Further guidance on Green Infrastructure as p prepared as Supplementary Planning Guidance in support of the sustainable place high quality and biodiverse living environments.
N/A	No changes proposed	Comments noted.
	preservation/enhancement in situ.         I agree that things should be looked after         No         Policy DNP8 (Green Infrastructure) requires all major developments to submit a Green Infrastructure Assessment. BDW would like clarification of whether this would apply to developments over 10 units (as per WG definition) and if so, it is suggested that a higher threshold should be used. Further clarification is required on what level of bio-diversity net gain is required.         Policy DNP8: requires the submission of a Green Infrastructure Assessment for all major developments over 10 units, the HBF suggests a higher threshold to avoid SME developers being unduly burdened.	preservation/enhancement in situ.No changes proposedI agree that things should be looked afterNo changes proposedNoNoPolicy DNP8 (Green Infrastructure) requires all major developments to submit a Green Infrastructure Assessment. BDW would like clarification of whether this would apply to developments over 10 units (as per WG definition) and if so, it is suggested that a higher threshold should be used. Further clarification is required on what level of bio- diversity net gain is required.Proposal to set a higher threshold should be used. Further clarification is required on what level of bio- diversity net gain is required.Policy DNP8: requires the submission of a Green Infrastructure Assessment for all major developments over 10 units, the HBF suggests a higher threshold to avoid SME developers being unduly burdened.Proposal to set a higher threshold within ENT8.N/ANo changes

Title:	itle: Do you have any comments to make on the key proposals? Maesteg and the Llynfi Valley			
ID	Comment	Summary of	Council response	
		changes being		
		sought/proposed		
82	No comments	No changes	Comments noted.	
		proposed		
516	I'll let Llynfi Valley residents comment on	No changes	Comments noted.	
	this.	proposed		
707	Don't know the area.	No changes	Comments noted.	
		proposed.		
847	No	No changes	Comments noted.	
		proposed		
996	No	No changes	Comments noted.	
		proposed		
329	No	No changes	Comments noted.	
		proposed		
254	No specific comments to make.	No changes	Comments noted	
400	Policy COM1: Housing Allocation	No changes	Comments noted.	
		proposed –		
	Jehu support the allocation of land south	supports	Preparation of the Replacement LDP has involved the assessment of 171 candidat	
	east of Pont Rhyd-y-cyff (Site Ref.	COM1(3) as a	has been assessed against the criteria in the Candidate Site Assessment Method	

green infrastructure assets are k. DNP8 clearly states that all nent. Major developments are igned to take into account the onnectivity whilst maximising ese requirements to sites of a s part of development will be acemaking and the creation of

green infrastructure assets are rk. DNP8 clearly states that all nent. Major developments are signed to take into account the connectivity whilst maximising lese requirements to sites of a s part of development will be acemaking and the creation of

date sites. Each candidate site odology which was previously

COM1(3)) as being identified as a separate allocation to land south of Pont Rhyd-y-cyff (Site Ref. COM1(4)) and land south west of Pont Rhyd-y-cyff (Site Ref. COM1(5)). Whilst The Jehu Group supports the inclusion of these other allocations, the provision of separate housing allocations under Policy COM1 enables flexibility over the delivery of each site and in turn a sustainable housing supply across the plan period. Furthermore, and as previously stated within representations to the PS, the delivery of land south east of Pont Rhyd-y- cyff (Site Ref. COM1(3) should not be fettered by the deliverability of the other allocations to land south of Pont Rhyd-y-cyff (Site Ref. COM1(4) and land south west of Pont Rhyd-ycyff (Site Ref. COM1(5).	separate housing allocation.	consulted upon (See Appendix 13 – Candidate Sites Assessment Report (2020)). I assessment, sites were examined based on any specific issues they raised in terms of location, neighbouring land uses, existing use(s), accessibility, physical character, and opportunities. Site promoters were asked to prepare and submit a number of te to demonstrate the site's deliverability, sustainability and suitability. Proceeding this those sites deemed appropriate were included for allocation in the Deposit Plan.
Jehu note that Table 4.3 of the Sustainability Appraisal of Proposed Allocations to be within the RLDP identifies that the land east of Bridgend Road (Candidate Site Ref. 325.C1) is considered to have a likely significant adverse effect on SA10b (water and flood risk) and SA14a (landscape). In addressing both of these identified effects the following information is provided to demonstrate that the proposal will not result in any likely significant adverse effects.		The Sustainability Appraisal (SA) of the Deposit Plan identifies all new candidate sit adverse or beneficial effects when assessed against SA site assessment criteria provides the resulting SA policy level mitigation schedule. Table 6.5 within the SA (a Deposit Plan) provides a summary version of the resulting SA policy level mitigation policies should be engaged in the determination of applications for development pr This is to ensure the avoidance of likely significant adverse effects (which the SA has occur).
Water and Flood Risk		
Vectos have provided a Flood Consequence and Drainage Appraisal of the site which was provided as part of the Stage 2 Candidate Site submissions, acknowledging that part of the site is covered by flood zones C2 and B. However, no development is proposed within these flood zones as all development will be	Alteration of Sustainability Appraisal Scoring - Land South East of Pont Rhyd-y- cyff (COM 1(3)) to no longer be scored negatively in relation to water and flood risk (SA10b).	It is fully acknowledged that Jehu have reaffirmed commitment to work with the Ce ensure a sustainable solution for the disposal of foul drainage is achieved durin application stages of the proposal. However, this does not negate the need for a ro the SA policy level mitigation over the RLDP period. This is important to ensure the st containing the specific policy tests are utilised when assessing future development acts as mitigation for site-specific likely significant adverse effects as assessed thro not considered appropriate to amend the SA scoring in relation to SA10b Water and F in anticipation of this adverse effect being mitigated, rather ensure any development appropriate policy-level mitagation to avoid otherwise predicted individual likely occurring at planning application stage.

During the Stage 2 detailed of their deliverability, general er, environmental constraints f technical supporting studies his detailed assessment, only

sites likely to have significant eria. Table 5.2 within the SA A (see also Appendix 6 of the on schedule to confirm which proposals on allocated sites. has predicted could otherwise

Council and Welsh Water to uring the pre-application and robust mechanism to secure e strategic or thematic policies ent proposals. The framework hrough the SA. It is therefore d Flood Risk in the SA Report ment proposal complies with by significant adverse effects

compliant with PPW and TAN 15. Jehu acknowledge that within the additional gualitative criteria set out within Table D1.C which contains the detailed Sustainability of Candidate Housing Sites that in considering 'drainage management and site capacity' the intention is for foul drainage to be treated at its Maesteg Waste Water Treatment Works (WWTW). However, Welsh Water have reported that there is limited capacity at this facility. Whilst there is limited capacity identified by Welsh Water, it does not mean that the proposal will have an adverse effect on water quality and the water environment as Jehu will work with the Council and Welsh Water to ensure a sustainable solution for the disposal of foul drainage is achieved during the pre-application and application stages of the proposal. It is therefore considered, inappropriate for the land south east of Pont Rhyd-y-cyff to be scored negatively in this regard and should no longer be considered to result in a likely significant adverse effect on water and flood risk (SA10b).

#### Landscape

A Landscape and Visual Appraisal (LVA) was carried out by Catherine Etchell Associates. Whilst detailed analysis of the special landscape features of the Western Uplands Special Landscape Area has not been undertaken at this stage, the LVA has demonstrated how the proposal responds to planning policy in particular LANDMAP and Green Infrastructure. The LVA details the site's keys assets in landscape terms are all to be retained which accords with the approach of the Landscape Character Assessment (LCA) and ensures that the existing landscape infrastructure will be in place to screen and soften the proposed development and provide wildlife corridors which link to surrounding countryside. Intervisibility with the surrounding countryside is remarkably low, even without leaf cover, by virtue of the surrounding wooded valley landscape. The development will be screened and integrated into the landscape

Alteration of Sustainability Appraisal Scoring - Land South East of Pont Rhyd-ycyff (COM 1(3)) to no longer be scored negatively in relation to SA14a (Landscape).

It is fully acknowledged that Jehu have commisioned an initial Landscape Visual Appraisal, which concludes with a series of recommendation for consideration of further refinements of the masterplan of the site as it advances to planning application stage which. It is also acknowledged that Jehu feel this provides the basis to demonstrate the proposed development of land south east of Pont Rhyd-y-cyff will not result in any likely adverse effects on the Western Uplands SLA and that this will be further demonstrated through the supporting Landscape and Visual Assessment at the planning application stage. However, this does not negate the need for a robust mechanism to secure the SA policy level mitigation over the RLDP period. This is important to ensure the strategic or thematic policies containing the specific policy tests are utilised when assessing future development proposals. The framework acts as mitigation for site-specific likely significant adverse effects as assessed through the SA. It is therefore not considered appropriate to amend the SA scoring in relation to SA14a Landscape in the SA Report in anticipation of this adverse effect being mitigated, rather ensure any development proposal complies with appropriate policy-level mitagation to avoid otherwise predicted individual likely significant adverse effects occurring at planning application stage.

by the tree corridors within the site, and will ensure that the valued landscape character described by LANDMAP and the LCA is not unduly compromised by the development. The LVA concludes with a series of recommendation for consideration of further refinements of the masterplan of the site as it advances to planning application stage which are considered to minimise any adverse effects. On this basis, it is considered that the proposal will not result in any significant adverse effects on landscape. Jehu consider that the proposed development of land south east of Pont Rhyd-y-cyff will not result in any likely adverse effects on the Western Uplands SLA which will be further demonstrated through the supporting Landscape and Visual Assessment at the planning application stage. At which point, the proposal will demonstrate that the design of the proposal does provide an attractive transition between the urban area and countryside as required by Policy DNP4: Special Landscape Areas. In any event, the land south east of Pont Rhyd-y-cyff is proposed to be removed from the Western Uplands SLA as part of the allocation of the site for development which is also reflected in the revised Settlement Development Boundary Review (2021). Jehu support the proposed deposit settlement boundary extension at Pont- Rhyd-y-cyff to enable the allocation and delivery of housing as identified in the DCD. Conclusion

Jehu support the allocation of land south east of Pont Rhyd-y-cyff (Site Ref. COM1(3) as a separate allocation to the other land allocated for development to the south and south west of Pont Rhyd-y-cyff to ensure unfettered delivery of the site and to ensure a sustainable supply of housing in this location. Jehu consider the site will not result in likely significant adverse effects on water and flood risk or landscape for the reasons outlined above. Technical matters relating to drainage and landscape will be



		1	
	addressed in detailed technical reports at the planning application stage which is anticipated to come forward in the early stages of the RLDP period.		
550	Ewenny road maesteg needs serious consideration in maximising housing and employment, especially as there is opportunities to develop land in the area. A satisfactory walking route would also be beneficial to the wider community		Comments noted. The Ewenny Road site is located within the existing urban area of Maesteg which is in Growth Area (as defined by SP1). The proposed development of the site presents the future regeneration of the area and would play a significant step in the Comprehensive development would improve the appearance of the site, whilst also residents, new job opportunities and facilities for local people. The site is located in new residential development due to the proximity to the town centre, public transport To this end, Policy PLA8 (7) safeguards part of the site for the provision of a new paper provide an opportunity for effective interchange between active travel, public transport as a long-term regeneration site ((COM1 (R2)), which the Council will remain com help deliver the housing requirement.
554	There are several issues at maesteg washery area already so more housing will make matters worse there	No changes proposed – concern over Maesteg Washery site	The Maesteg Washery site (Policy COM1 (R3)) presents a significant opportunity for the area and would play a significant step in the revitalisation of Maesteg. The L brownfield regeneration site will require remediation-based viability issues to be addr forward and the site is in an area characterised by low house prices and little deve the site is allocated as a long-term regeneration site, which the Council will remain of to help deliver the housing requirement. In this way, the remediation strategy, neo- master planning can be progressed in a manner that ensures the future redevelopm greatest positive impact on the surrounding community.
287	Support - please see covering letter submitted As set out above, Land South of Pont Rhyd- y-cyff has been included as a housing allocation within the Deposit Plan, to provide a total of 102 units, including 15 affordable units, in years 6-15 of the plan period to 2033. The inclusion of the site is welcomed by our client, who would like to take this opportunity to further provide and express their support for the Deposit Plan. Moreover, the identified delivery timescales and quantum of units for the site are agreed with and considered to be entirely suitable and appropriate. Our client would also like to take this opportunity to also highlight their support for the inclusion of the other two housing	(COM1(4)), Land South East of Pont Rhyd-y-Cyff (COM1(3)) and Land South West of Pont Rhyd-y- Cyff (COM1(5)).	Comments noted
	allocations within Pont Rhyd-y-cyff, these being Land South East of Pont Rhyd-y-cyff (ref. COM1(3)) and Land South West of		

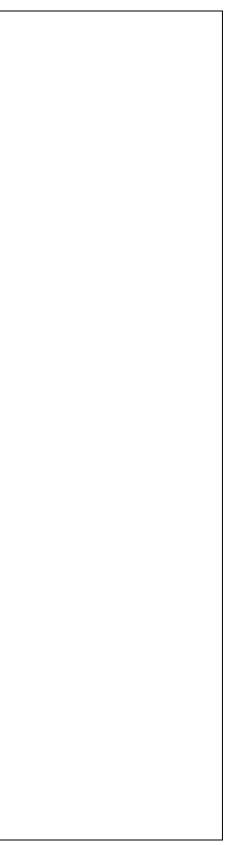
is identified as a Regeneration nts a significant opportunity for the revitalisation of Maesteg. also providing homes for new ed in a sustainable location for sport and education provision. / park and ride facility. This will ansport and cars to facilitate a ey to work. This site is allocated ommitted to, but not rely on to

y for the future regeneration of e LDP acknowledges that this ddressed before it can be taken evelopment activity. Therefore n committed to, but not rely on necessary enabling works and pment of the site can have the

Pont Rhyd-y-cyff (ref. COM1(5)). Whilst it is	
acknowledged and accepted that the	
allocations do not comprise a strategic	
allocation, together they offer a sustainable	
extension of the existing settlement of Pont	
Rhyd-y-cyff and as such, will realise the	
wider vision for the area.	
Suitability Viability and Dalivarability	
Suitability, Viability and Deliverability	
Evidence has of course been provided	
through the previous extensive	
representations (including Candidate Sites	
representations in 2018, representations to	
the Preferred Strategy in 2019, Stage 2	
Candidate Site Representations in 2020),	
made to Bridgend County Borough Council	
through the LDP review to evidence the	
suitability and viability of the site. Through	
the course of the previous representations	
to yourselves, the site promoter, BMP	
Technology Corp Ltd, has provided	
extensive supporting information, including	
a Viability Appraisal, Preliminary Ecology	
Survey and Transport Assessment.	
Together the submissions have	
demonstrated that the site is not only	
appropriately located within close	
association and connection to Pont Rhyd-y-	
cyff, but that it is deliverable in line with	
placemaking requirements, public open	
space provision, appropriate highway and	
access considerations and active travel	
linkages. All of which fully comply with	
Welsh Assembly Government and Council	
aspirations of creating cohesive new	
neighbourhoods as defined in PPW11 and	
Future Wales Plan.	
As highlighted shows the ellocation of the	
As highlighted above, the allocation of the	
Land South of Pont Rhyd-y-cyff site	
together with the Land south East of Pont	
Rhyd-y-cyff and Land South West of Pont	
Rhyd-y-cyff sites will enable and facilitate	
sustainable growth as per the aspirations of	
Bridgend County Borough Council.	
Dragena County Dorough Council.	
With regards to the representations	
With regards to the representations	
submitted to date, they have demonstrated	
that the site is inherently suitable for	



residential development, which is acknowledged by yourselves by virtue of the site's inclusion as a housing allocation within the Deposit Plan. It is therefore considered prudent at this stage of the LDP review and within this submission to further highlight the deliverability of the site, whereby it can be brought forward for development in line with the timescales set out for the allocation.		
Positive discussions have been held and are ongoing with potential developers, to secure backing for the site to enable its delivery in line with the Council's aspirations. Furthermore, the site promoter, BPM Technology Corp Ltd, is actively seeking to prepare and submit a formal planning application to Bridgend County Council to secure permission for the site to enable its development at the earliest opportunity. As part of this, further supporting information is being procured to present a robust planning application over and above the representations already made.		
Summary		
To conclude, and in light of the above, we wish to emphasise that our client, BPM Technology Corp Ltd strongly supports the Deposit Plan and is committed to ensuring that the development site can be delivered and contribute towards the wider objective of delivering the opportunity.		
We consider that the information contained within this consultation response should provide sufficient evidence to support the approach of the Deposit Plan to retain the site as an allocation for residential development during the Plan Period to 2033.		



400	Policy COM1: Housing Allocation Jehu support the allocation of land south east of Pont Rhyd-y-cyff (Site Ref. COM1(3)) as being identified as a separate allocation to land south of Pont Rhyd-y-cyff (Site Ref. COM1(4)) and land south west of Pont Rhyd-y-cyff (Site Ref. COM1(5)). Whilst The Jehu Group supports the inclusion of these other allocations, the provision of separate housing allocations under Policy COM1 enables flexibility over the delivery of each site and in turn a sustainable housing supply across the plan period. Furthermore, and as previously stated within representations to the PS, the delivery of land south east of Pont Rhyd-y- cyff (Site Ref. COM1(3) should not be fettered by the deliverability of the other allocations to land south of Pont Rhyd-y-cyff (Site Ref. COM1(4) and land south west of Pont Rhyd-y-cyff (Site Ref. COM1(5). Jehu note that Table 4.3 of the Sustainability Appraisal of Proposed Allocations to be within the RLDP identifies that the land east of Bridgend Road (Candidate Site Ref. 325.C1) is considered to have a likely significant adverse effect on SA10b (water and flood risk) and SA14a (landscape). In addressing both of these identified effects the following information is provided to demonstrate that the proposal will not result in any likely significant adverse effects:		Comments noted (refer to Candidate Site Assessment).
	Water and Flood Risk Vectos have provided a Flood Consequence and Drainage Appraisal of the site which was provided as part of the Stage 2 Candidate Site submissions, acknowledging that part of the site is covered by flood zones C2 and B. However, no development is proposed within these flood zones as all development will be steered into Zone A. The report concludes that given development is kept within Zone A and Surface water runoff from the site will be managed using SUDS, in accordance with the sustainable drainage hierarchy via restriction to greenfield runoff rates prior to	Alteration of Sustaiability Appraisal Scoring - Land South East of Pont Rhyd-y- cyff (COM 1(3)) to no longer be scored negatively in relation to water and flood risk (SA10b).	The Sustainability Appraisal (SA) of the Deposit Plan identifies all new candidate adverse or beneficial effects when assessed against SA site assessment crite provides the resulting SA policy level mitigation schedule. Table 6.5 within the SA Deposit Plan) provides a summary version of the resulting SA policy level mitigati policies should be engaged in the determination of applications for development This is to ensure the avoidance of likely significant adverse effects (which the SA boccur). It is fully acknowledged that Jehu have reaffirmed commitment to work with the ensure a sustainable solution for the disposal of foul drainage is achieved du application stages of the proposal. However, this does not negate the need for a the SA policy level mitigation over the RLDP period. This is important to ensure the containing the specific policy tests are utilised when assessing future development acts as mitigation for site-specific likely significant adverse effects as assessed the not considered appropriate to amend the SA scoring in relation to SA10b Water and

te sites likely to have significant iteria. Table 5.2 within the SA SA (see also Appendix 6 of the ation schedule to confirm which nt proposals on allocated sites. A has predicted could otherwise

ne Council and Welsh Water to during the pre-application and a robust mechanism to secure the strategic or thematic policies ment proposals. The framework d through the SA. It is therefore and Flood Risk in the SA Report discharge in the River Llynfi, the site is capable of delivering development which is compliant with PPW and TAN 15. Jehu acknowledge that within the additional qualitative criteria set out within Table D1.C which contains the detailed Sustainability of Candidate Housing Sites that in considering 'drainage management and site capacity' the intention is for foul drainage to be treated at its Maesteg Waste Water Treatment Works (WWTW). However, Welsh Water have reported that there is limited capacity at this facility. Whilst there is limited capacity identified by Welsh Water, it does not mean that the proposal will have an adverse effect on water quality and the water environment as Jehu will work with the Council and Welsh Water to ensure a sustainable solution for the disposal of foul drainage is achieved during the pre-application and application stages of the proposal. It is therefore considered, inappropriate for the land south east of Pont Rhyd-y-cyff to be scored negatively in this regard and should no longer be considered to result in a likely significant adverse effect on water and flood risk (SA10b).

#### Landscape

A Landscape and Visual Appraisal (LVA) was carried out by Catherine Etchell Associates. Whilst detailed analysis of the special landscape features of the Western Uplands Special Landscape Area has not been undertaken at this stage, the LVA has demonstrated how the proposal responds to planning policy in particular LANDMAP and Green Infrastructure. The LVA details the site's keys assets in landscape terms are all to be retained which accords with the approach of the Landscape Character Assessment (LCA) and ensures that the existing landscape infrastructure will be in place to screen and soften the proposed development and provide wildlife corridors which link to surrounding countryside. Inter-visibility with the surrounding countryside is remarkably low, even without leaf cover, by virtue of the surrounding wooded valley landscape. The development will be screened and integrated into the

Alteration of Sustaiability Appraisal Scoring Land South East of Pont Rhyd-ycyff (COM 1(3)) to no longer be scored negatively in relation to SA14a (Landscape).

in anticipation of this adverse effect being mitigated, rather ensure any development proposal complies with appropriate policy-level mitagation to avoid otherwise predicted individual likely significant adverse effects occurring at planning application stage.

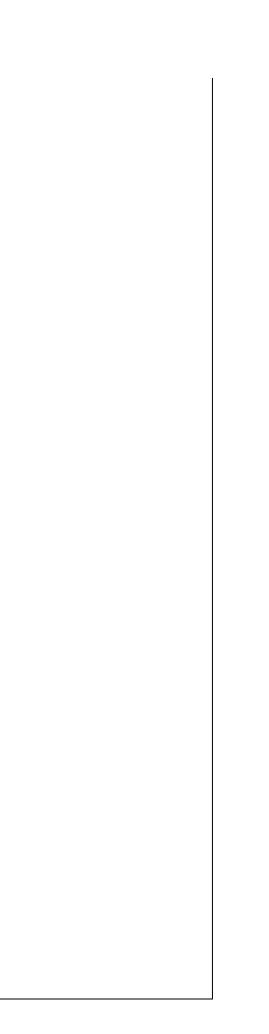
The Sustainability Appraisal (SA) of the Deposit Plan identifies all new candidate sites likely to have significant adverse or beneficial effects when assessed against SA site assessment criteria. Table 5.2 within the SA provides the resulting SA policy level mitigation schedule. Table 6.5 within the SA (see also Appendix 6 of the Deposit Plan) provides a summary version of the resulting SA policy level mitigation schedule to confirm which policies should be engaged in the determination of applications for development proposals on allocated sites. This is to ensure the avoidance of likely significant adverse effects (which the SA has predicted could otherwise occur).

It is fully acknowledged that Jehu have commisioned an initial Landscape Visual Appraisal, which concludes with a series of recommendation for consideration of further refinements of the masterplan of the site as it advances to planning application stage which. It is also acknowledged that Jehu feel this provides the basis to demonstrate the proposed development of land south east of Pont Rhyd-y-cyff will not result in any likely adverse effects on the Western Uplands SLA and that this will be further demonstrated through the supporting Landscape and Visual Assessment at the planning application stage. However, this does not negate the need for a robust mechanism to secure the SA policy level mitigation over the RLDP period. This is important to ensure the strategic or thematic policies containing the specific policy tests are utilised when assessing future development proposals. The framework acts as mitigation for site-specific likely significant adverse effects as assessed through the SA. It is therefore not considered appropriate to amend the SA scoring in relation to SA14a Landscape in the SA Report in anticipation of this adverse effect being mitigated, rather ensure any development proposal complies with appropriate policy-level mitagation to avoid otherwise predicted individual likely significant adverse effects occurring at planning application stage.

landscape by the tree corridors within the site, and will ensure that the valued landscape character described by LANDMAP and the LCA is not unduly compromised by the development. The LVA concludes with a series of recommendation for consideration of further refinements of the masterplan of the site as it advances to planning application stage which are considered to minimise any adverse effects. On this basis, it is considered that the proposal will not result in any significant adverse effects on landscape. Jehu consider that the proposed development of land south east of Pont Rhyd-y-cyff will not result in any likely adverse effects on the Western Uplands SLA which will be further demonstrated through the supporting Landscape and Visual Assessment at the planning application stage. At which point, the proposal will demonstrate that the design of the proposal does provide an attractive transition between the urban area and countryside as required by Policy DNP4: Special Landscape Areas. In any event, the land south east of Pont Rhyd-ycyff is proposed to be removed from the Western Uplands SLA as part of the allocation of the site for development which is also reflected in the revised Settlement Development Boundary Review (2021). Jehu support the proposed deposit settlement boundary extension at Pont-Rhyd-y-cyff to enable the allocation and delivery of housing as identified in the DCD.

#### Conclusion

Jehu support the allocation of land south east of Pont Rhyd-y-cyff (Site Ref. COM1(3) as a separate allocation to the other land allocated for development to the south and south west of Pont Rhyd-y-cyff to ensure unfettered delivery of the site and to ensure a sustainable supply of housing in this location. Jehu consider the site will not result in likely significant adverse effects on water and flood risk or landscape for the reasons outlined above. Technical matters relating to drainage and landscape will be addressed in detailed technical reports at



	the planning application stage which is anticipated to come forward in the early stages of the RLDP period.		
170	As already identified in previous responses concern is raised about the delivery of a number of the sites in this area. All of the sites have been in at least one previous plan and some have had planning permission yet have not delivered any units. Member's evidence would also suggest that market demand may now allow more than one site to come forward at one time. Although it is noted that not all units are including in the housing requirement the HBF considers that there are still too many units allocated in this area.	Reduce housing allocation within Maesteg and the Llynfi Valley.	No action is considered necessary. Three sites within this area are proposed allocation of the immediate housing land supply ((COM1(3) Land South East of Pont Rhyd-y-cy Pont Rhyd-y-cyff and COM1(5) and Land South West of Pont Rhyd-y-cyff)). The proposals and each site promoter has robustly demonstrated delivery in accordance out in the Development Plans Manual. Indeed, a detailed body of evidence has been this respect, including a Statement of Common Ground between three site promoted deliverability and saleability of the sites. This process has provided a high degree are realistically deliverable, considering the full plethora of associated development provision and placemaking principles necessary to deliver high-quality new communwithin the Candidate Site Assessment. An appropriate delivery trajectory has been for with the three site promoters, considering delivery timescales and sales rates account of the local housing market.
			The other three sites proposed within this vicinity are brownfield regeneration allocat that the Council intends to 'rollover' and re-allocate as Long-Term Regeneration Sit Washery, Coegnant Reclamation Site (Caerau) and the Former Cooper Standard Sit The retention of such sites represents a necessary degree of continuity with the essential to implement the long-term regeneration strategy embodied within the However, for the avoidance of doubt, and in accordance with national policy, thes Sites are not included as a component of housing supply. The housing land sit dependent on their delivery, in recognition of the fact that they require longer remediation-based enabling works and/or more detailed strategic master plans befor Whilst Long-Term Regeneration sites will still be allocated in the plan to enable their upon as contributing to the housing requirement and will also not be included in the v essentially 'bonus sites', notwithstanding the fact that these significant brownfield si sustainable development and delivery of the full range of placemaking principles Wales. This is clearly referenced within the Housing Trajectory Background Pa representor's concerns regarding these sites are noted, they are considered incoms Replacement LDP's housing requirement. This is considered in further detail Background Paper, the Minimising the Loss of the Best and Most Versatile (BMV) Ag Paper and the Candidate Site Assessment.
38	Support	None	Comments noted.
394	Support	None	Comments noted.
407	N/A	No changes proposed	Comments noted.

-	Title: Do you have any comments to make on the key proposals? Porthcawl, Pyle, North Cornelly and Kenfig Hill					
	ID	Comment	Summary of	Council response		
			changes being			
			sought/proposed			
	82	BDW's comments in relation to the	Change to	The total housing provision, and spatial distribution thereof, has been subject to site		
		proposed Porthcawl Waterfront site are	housing trajectory	enable development of the housing trajectory. The trajectory was prepared initially		
		detailed in the response to Question 3	for Porthcawl	the respective site-promoters, followed by effective collaboration and involvement v		
		above. To summarise, whilst BDW support	Waterfront	at a Stakeholder Group Meeting. As documented within the Housing Trajectory Bac		
		the development of this mixed-use		no outstanding matters of disagreement on the completion figures or the timing and		
		regeneration site, and understands that				

ations that are counted as part r-cyff, COM1(4) Land South of These are all new allocation nce with the requirements set een provided to the Council in oters to confirm the collective e of confidence that the sites nt requirements, infrastructure unities. This is clearly outlined n formulated in close dialogue across all three sites, taking

ations within the existing LDP Sites. These include Maesteg Site, Ewenny Road (Maesteg). first adopted LDP, which is ne Replacement LDP Vision. ese Long-Term Regeneration supply will therefore not be er lead-in times, preparatory efore they can come forward. eir delivery, they will not relied e windfall allowance. They are sites are highly conducive to es outlined in Planning Policy Paper. Therefore, whilst the onsequential to delivery of the within the Spatial Options Agricultural Land Background

te-specific phasing analysis to y through close dialogue with t with a range of stakeholders ackground Paper, there were nd phasing of sites in the plan

	progress is now being made in terms of the necessary flood defence works at the site, taking into account lead-in times for planning and marketing and all the infrastructure works that are required, it is unlikely that the first tranche of housing completions would start coming forward in 2023 as projected. It is therefore considered that the housing projections are not realistic and it is unlikely that any meaningful housing will be delivered at the Waterfront site until the end of the plan period. There is a need for the Deposit Draft RLDP to include other housing sites in Porthcawl for non-strategic, deliverable and edge of settlement development, in order to ensure that there is a stable supply of housing land in the town, and to meet current unmet demand for family homes. This would relieve some of the pressure that is otherwise wholly on the Waterfront site to deliver for the whole of the settlement and would make a short term contribution to boosting housing land supply. The candidate site east of Dan-y-graig Avenue, previously put forward by BDW, is deliverable and viable, and offers a sustainable and suitable location for a meaningful number of new homes to be provided early in the RLDP's plan period. The allocation of this site for housing should		<ul> <li>period (including those sites with planning permission and new housing allocations) Stakeholder Group Meeting.</li> <li>Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subje of its sustainability, deliverability and viability credentials in the same manner as all of has been a substantial change in circumstances to demonstrate the site can be deliv LDP period, as indicated within the housing trajectory. The Council has now purch over Phase 1 (Salt Lake), coastal defence works are progressing on site and are of end of 2022. Partnership options are currently being explored in order to bring forwa has commenced in relation to procurement mechanisms and a formal procuremer commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted b owner and a significant majority of the site is not reliant on coastal defence works owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now nor be unable to progress and come forward together, as further evidenced by the extense evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bo supported.</li> <li>Furthermore, the proposal to include Candidate Site 312.C1 is not supported and is Strategy. The total level of housing provision within the Deposit Plan is set applallowance to ensure delivery of the housing requirement, taking into account the pounforeseen issues in accordance with the Development Plans Manual.</li> </ul>
100	be considered further.	Cashalaw	
136 6	Whilst it is acknowledged that all three are main settlements, as evidenced within the Settlement Assessment Study 2019, revised 2021 and reflected in the spatial strategy in the DCD, Llanmoor remain cautious over the level of housing being distributed to these settlements given the lack of delivery in the extant LDP.	See below.	
	Porthcawl Llanmoor are aware that work has now commenced on the Porthcawl Sandy Bay Coastal Scheme which is anticipated to be completed in May 2022 and acknowledge the Council now have control over Phase 1 (Salt Lake) with partnership options being explored to bring forward development. Phase 2 (Sandy Bay/Coney Beach) are	Change to housing trajectory for Porthcawl Waterfront	Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subject of its sustainability, deliverability and viability credentials in the same manner as all of has been a substantial change in circumstances to demonstrate the site can be delive LDP period and as indicated within the housing trajectory. The Council has now purc- over Phase 1 (Salt Lake), coastal defence works are progressing on site and are of end of 2022. Partnership options are currently being explored in order to bring forwar has commenced in relation to procurement mechanisms and a formal procurement commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted by

#### ns) following conclusion of the

bject to robust re-assessment II other candidate sites. There elivered over the Replacement rchased and has total control e due to be completed by the ward development, initial work nent exercise is scheduled to d by the Council and a private orks to come forward. A lande is likely to be brought to the preason why both phases will ensive supporting deliverability both unsubstantiated and not

is also contrary to the Spatial appropriately with a flexibility potential for non-delivery and

bject to robust re-assessment Il other candidate sites. There elivered over the Replacement urchased and has total control e due to be completed by the ward development, initial work nent exercise is scheduled to d by the Council and a private

jointly promoted by the Council and a developer and it is recognised a land owners agreement is in place with a disposal strategy to bring to the market shortly. Whilst Llanmoor acknowledge that the sea wall defences are being implemented and are due to be completed in 2022 in light of the past delays in bringing the site forward Llanmoor consider that the housing trajectory remains overly optimistic and is more likely to commence later in the plan period, allowing for the completion of the works and the disposal of the land. It is therefore considered the trajectory is overly optimistic and that in reality delivery on site would not begin until 2027-28 at the earliest.		owner and a significant majority of the site is not reliant on coastal defence works owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no re be unable to progress and come forward together, as further evidenced by the extensi evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bot supported.
Land East of Pyle Despite Pyle being a main settlement and considered a Sustainable Growth Area within the DCD spatial and growth strategies, Llanmoor has undertaken a review of the evidence base documents in respect of Land East of Pyle (Allocation Ref: PLA5) and remain concerned over the site – specific deliverability and the affect this could have on the robustness of the housing trajectory; both of which are essential considerations over housing delivery for the next plan period. Llanmoor further consider that the proposed quantum of development of 2,000 homes should be considered a strategic issue which should proceed through a Strategic Development Plan (SPD). Whilst there is no defined figure within Planning Policy Wales (PPW), Edition 11 (2021) on what constitutes a strategic level of housing, the Development Plan Manual (DPM), Edition 3 (2020) sets out the content of an SDP on page 215 in terms of identifying spatial areas to accommodate growth above a set threshold and gives the example of 1,000 dwellings. Paragraph 10.7 states SDPs should set thresholds below which places and or issues should not be included in the plan. Whilst there is no SDP in place, the DPM provides an indication that a threshold of 1,000 dwellings is considered a strategic	Land East of Pyle Allocation to be considered via the forthcoming SDP rather than the Replacement LDP	As documented in the Candidate Site Assessment, the Land East of Pyle si demonstrated delivery in accordance with the requirements set out in the Developmer plethora of evidence has been provided to the Council to support its delivery, investigations and appraisals, masterplans, a viability assessment, a transport consideration of s106 requirements, infrastructure and costs. This process has p confidence that the site is realistically deliverable, considering the full plethora or requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close disite-promoters, followed by effective collaboration and involvement with a range of sta Group Meeting. As documented within the Housing Trajectory Background Paper, i matters of disagreement on the completion figures or the timing and phasing of sites in those sites with planning permission and new housing allocations) following conclusio Meeting. As such, the proposed change to Land East of Pencoed trajectory is bot supported. Moreover, work on the SDP has not yet commenced, regulations are yet to be finalise not yet been defined through this process. The Bridgend Replacement LDP is being i forthcoming SDP and is bound by a Delivery Agreement. A range of plan preparatio in the Review Report before work on the Replacement LDP began. The Review Rep Council undertakes a full review of the existing LDP on an individual Local Planning / wherever possible working collaboratively with other LPAs to produce a joint evidence to prepare a SDP. Whilst the Council remains committed to the SDP process, the demonstrated that Land East of Pyle is both viable and deliverable during the Re accordance with the Growth and Spatial Strategy. The representor's concerns i implications are unsubstantiated, especially considering Bridgend County Borough dialogue with Neath Port Talbot County Borough Council through plan preparation. Borough Council has submitted formal representations on the Bridgend

ks to come forward. A landis likely to be brought to the reason why both phases will nsive supporting deliverability both unsubstantiated and not

site promoter has robustly nent Plans Manual. A detailed ary, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new dialogue with the respective stakeholders at a Stakeholder r, there were no outstanding s in the plan period (including sion of the Stakeholder Group ooth unsubstantiated and not

ised and site thresholds have og prepared in advance of the tion options were considered Report recommended that the og Authority (LPA) area basis, once base and with the region the site promoter has clearly Replacement LDP period, in s regarding cross boundary ogh Council has remained in on. Neath Port Talbot County Plan and cite no objections to

	issue by Welsh Government. Therefore, Llanmoor consider the allocation of 2,000		In addition, the number of dwellings Land East of Pyle is expected to deliver durin similar in scale to the other proposed Strategic Sites. Therefore, it is not considered a
	dwellings is not a matter for the Replacement LDP to consider, at this scale it is likely to have cross boundary implications and should better be addressed through a SDP.		on site progression until a future SDP is adopted.
	The Candidate Site Assessment Report (2021) notes that the site is located on the periphery of the settlement of North Cornelly, a Sustainable Growth Area. The Sustainability Appraisal identifies numerous technical issues and constraints and more fundamentally that for such a significant proposed allocation, there is no developer involvement. In a similar way to other proposed allocations, the trajectory appears to be optimistic in the delivery of homes, beginning in 2025 when there is no known developer on board. In light of the unknown costs of infrastructure requirements, the Land East of Pyle cannot be considered to be free from physical constraints or economically viable. A significant amount of work will be required to enable the site to be deliverable. In this context Llanmoor question the delivery of housing shown to commence in 2025, and consider it more realistic to consider the first tranche of housing would commence later in the plan period, around 2028-29 with a similar rate of		
511	completions as the promoter suggest. I think placing a supermarket in a prime tourist location on salt lake will be forever a mistake. BCBC need to look at places like Saundersfoot where they have placed small modern shops alongside their car park. Port talbot have a water area for children and are improving their seafront for tourism. Placing an AIDI supermarket on the seafront will be an eyesore. Firstly for tourism you need car parking! Already there's a problem with car parking in the area, this will be made worse with the supermarket/housing taking up the car park. At least use half of salt lake as a car park with some trees and green spaces between. Additionally, porthcawl had been promised	Concerns regarding proposed foodstore in Porthcawl / Strategic Allocation PLA1: Porthcawl Waterfront	The Deposit Plan has been prepared in accordance with Welsh Government Develop 3). It contains guidance on how to prepare, monitor and revise a development plevidence to ensure that plans are effective and deliverable and contribute to placema policy set out in Planning Policy Wales (PPW). The Deposit Plan has been underpinned through the identification of the most app growth and housing provision, all of which have been based upon well informed, e regarding need, demand and supply factors (See Appendix 42 – Background P Strategic Growth Options). A range of growth scenarios across the whole Replacem analysed and discussed within the Strategic Growth Options Background Paper. Th County Borough's demographic situation is likely to change from 2018-2033 and infor response for the Replacement LDP. As such the Replacement LDP identifies an ap 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

## ring the Replacement LDP is appropriate to delay progress

opment Plans Manual (Edition plan, underpinned by robust making, as defined in national

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 appropriate plan requirement sustainable patterns of growth,

y Options Background Paper ment of land within or on the

harbour needs shower facilities which were forgotten about when renewed a few years ago. Don't be surprised if there are protests if the supermarket goes ahead I'll be joining	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 thro 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.
	The Replacement LDP apportions sustainable growth towards settlements that alreat services, facilities and employment opportunities and are most conducive to en- development. As such, a Settlement Assessment has been undertaken (See Ap- sustainable settlement hierarchy. Based upon the consideration of a comprehens Replacement LDP will maintain Porthcawl's role as a Main Settlement capable of s growth, demonstrating capacity for sustainable growth based on its accessibility, a employment provision in the context of its existing population base.
	The plan preparation has involved the assessment of 171 sites. Each candidate site I the criteria in the Candidate Site Assessment Methodology which was previously con 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessme 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 part of the proposed allocation of Porthcawl Waterfront, development will l requirements including masterplan development principles and placemaking prince PLA1 – Page 63). The provision of new residential units, including affordable dwellin of other vital regeneration requirements comprising flood defences, public open space travel links plus education, retail and community facility provision.
	A Placemaking Strategy has been developed and produced of which provides the broader vision for Porthcawl; which aims to create a premier seaside resort of region comprehensive regeneration of this key waterfront site. It proposes a sustainable complementary land uses across the area. It also proposed to retain and improve up space within Griffin Park, whilst creating significant new areas of open space along t with high quality active travel routes that traverse the entire site between the harbou development of the waterfront in this manner will improve the attractiveness of the t work, enhance the vibrancy of the Town Centre and deliver wider socio-economic ber settlement of Porthcawl to thrive and prosper.
	In terms of Salt Lake, development will include a new food store, residential (incl supporting commercial uses and leisure. With regards to leisure, an area north of th will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facil site could provide an alternative form of leisure/tourism/commercial, year roun Furthermore, the comprehensive enhancement of the Eastern Promenade with ne better landscaping provides an exciting opportunity to create an area that will not onl also act, with others, to set a quality benchmark which will also need to be achieved

Id sites. It continues to focus ting LDP, hence, Porthcawl, prough their designation as nt opportunities within these Vales and seeks to minimise

ready benefit from significant enabling transit orientated Appendix 19) to establish a nsive range of variables the f supporting regeneration-led availability of amenities and

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

I be subject to site-specific inciples (See Deposit Policy llings, will enable the delivery ace, leisure, enhanced active

the framework to deliver the onal significance through the le distribution and variety of upon areas of attractive open g the seafront, supplemented our and Trecco Bay. Physical e town as a place to live and benefits that allow the broader

ncluding affordable housing), the harbour within Salt Lake cility is not delivered then the und, wet-weather attraction. new buildings, facilities and only enhance the frontage but ed elsewhere.

	Mixed-use development will be encouraged throughout the development. Commerce on the ground floor if there is market demand for such uses. Retail uses, restaurants a encouraged. This mix of uses will help bring life and vitality during the day and into t
	Sandy Bay will accommodate public open space, residential, education provision a open space, Policy PLA1 requires development of Porthcawl Waterfront to incorpora Outdoor Recreation Facilities of which are to be delivered in accordance with P Recreation Facilities and New Housing Development Supplementary Planning Guida
	Additionally, there are plans for creating new facilities at Cosy Corner, including concreating employment opportunities. The plans for Cosy Corner include an all-new structure which will feature new premises suitable for retail and start-up enterprises. The count meeting space for community use, a parade square for the Sea Cadets and an offic well as changing facilities for users of the nearby marina. If funding allows, plans a enhance the scheme with new landscaping, public seating, a children's play area and of providing comfortable outdoor shelter from rain and the sun.
	Strategic Policy 16: Tourism and supporting development management polic development. The LDP will also provide the framework for the provision and prote quality, tourism, sport, recreation and leisure facilities and to diversify tourism in the 0 thereby contributing to the Aims and Priorities of the Bridgend County Destination 2022) (See Appendix 30).
	Proposals for the Porthcawl Waterfront Regeneration site are currently being dev 'Placemaking Strategy' that represents a form of sub area masterplanning support material. This will provide a coherent basis for guiding development, securing future for and delivering a comprehensive range of regeneration projects. I urge you to engagement events being facilitated by Austin-Smith: Lord. In addition, any future this site will be subject to a formal planning application where you can also have you
	In terms of the proposed foodstore, evidence confirms (See Appendix 16 – Retail Stufunction as a town centre and performs well against most indicators of vitality and vinhas a limited convenience offer which is significantly below the UK average. Althous range of smaller food stores suitable for top-up shopping, there is only one large supposed food shopping. This provides limited consumer choice and means that most residents to meet their needs.
	Marketing for a new foodstore was carried out in autumn 2020 whereby numeror received and appraised. A robust selection process in which each bid was carefully a development brief resulted in Aldi Stores Ltd being identified as the preferred bidder. brief required bidders to submit high-quality, bespoke designs for premises that could as well as incorporating appropriate access and active travel arrangements. The dev store site does not prescribe a particular architectural approach, but it does requir making", taking in account the historic urban form and scale of the surrounding development designed for human interaction and enjoyment whilst responding to an setting, cultural and heritage of Porthcawl. Cabinet members approved the disposal of and delegated authority to officers to approve the terms of the disposal agreement.
	The food store site forms a key element of the wider masterplan that has been w Waterfront Regeneration Scheme and is intended to act as a precursor to, and ca

rcial units will be considered and cafes will be particularly the evening.

and commercial. In terms of rate Green Infrastructure and Policy COM10 and Outdoor dance.

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

licies will promote tourism otection of well-located, good e County including Porthcawl, on Management Plan (2018-

eveloped further as part of a oported by illustrative design e funding, attracting investors to participate in the public e development proposals for our say.

Study) that the centre fulfils its viability. However, the centre hough the centre contains a supermarket suitable for main ts must travel to other centres

rous bids (five in total) were assessed against a planning er. The planning development uld act as 'gateway buildings' levelopment brief for the food uire clear attention to "placeing area. This will enable a and celebrating the maritime I of the site to Aldi Stores Ltd, t.

worked up for the Porthcawl catalyst for, future phases of

516 707	I'll let Porthcawl, Pyle, North Cornelly and Kenfig Hill residents comment on this. With regard to Porthcawl - Building houses and shops on Salt Lake would remove the area that allows leisure and tourism to be a feature of the town. It provides space for people to prepare for water sports, to sort their buggies and wheelchairs out - safe from roadside parking. Those activities will be severely curtailed. Not only that - houses and supermarkets are not tourist attractions. There's a small supermarket in Porthcawl and another in Pyle, how many are really needed?	No changes proposed. Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront / proposed food store	<ul> <li>development across the wider site. Subject to a planning application, the foodstore w all-new residential, leisure, retail development at Salt Lake as well as new areas terminus, active travel facilities and more.</li> <li>In terms of car parking, it's acknowledged that a sound and robust parking strategy to the regeneration. As part of the strategy, the site will accommodate a new multi st Hillsboro car par enabling more ground floor space to be given over to publi Consideration should be given to alternative future uses as, overtime, the aspiratio Waterfront will be principally by public transport including park and ride schemes, g of private vehicles requiring parking facilities. Consultations confirmed widespread multi storey car park whilst recognising it will change the immediate outlook of proper the authority has a strong desire to facilitate and actively encourage a modal shi 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 Pras a boulevard where visitors and locals could arrive at, and depart from the regene The location of the bus terminus will enable access towards the waterfront and also thas also undertaken feasibility work to explore proposals to deliver a bus terr regeneration area. The bus terminus project is being brought forward in connection Metro Plus project and is seen as a key element of the wider regeneration plans. Comments noted.</li> <li>Comments noted. The Deposit Plan has been underpinned through the identificat scale of economic growth and housing provision, all of which have been based up based judgements regarding need, demand and supply factors (See Appendix - Preferred Strategy Strategic Growth Options). A range of growth scenarios across the period have been analysed and discussed within the Strategic Growth Options B considered how the County Borough's demographic situation is likely to change for the most appropriate response for the Replacement LDP. A</li></ul>
	feature of the town. It provides space for people to prepare for water sports, to sort their buggies and wheelchairs out - safe from roadside parking. Those activities will be severely curtailed. Not only that - houses and supermarkets are not tourist attractions. There's a small supermarket in Porthcawl and another in Pyle, how many	Allocation PLA1: Porthcawl Waterfront / proposed food	Preferred Strategy Strategic Growth Options). A range of growth scenarios across the period have been analysed and discussed within the Strategic Growth Options B considered how the County Borough's demographic situation is likely to change from the most appropriate response for the Replacement LDP. As such the Replacement plan requirement to enable a balanced level of housing and employment sustainable patterns of growth, support existing settlements and maximise viable af 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.
			settlements accords with the site-search sequence outlined in Planning Policy Wardevelopmental pressure on Best and Most Versatile (BMV) agricultural land. 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 A sustainable settlement hierarchy. Based upon the consideration of a comprehen Replacement LDP will maintain Porthcawl's role as a Main Settlement capable of growth, demonstrating capacity for sustainable growth based on its accessibility, a employment provision in the context of its existing population base.

will be constructed alongside as of green open space, bus

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

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

ation of the most appropriate upon well informed, evidence (42 – Background Paper 2: the whole Replacement LDP Background Paper. This has from 2018-2033 and informed placement LDP identifies an ent provision that will achieve affordable housing delivery.

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 Wales and seeks to minimise

ready benefit from significant enabling transit orientated Appendix 19) to establish a nsive range of variables the f supporting regeneration-led availability of amenities and

	The plan preparation has involved the assessment of 171 sites. Each candidate site I the criteria in the Candidate Site Assessment Methodology which was previously con 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessme 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 part of the proposed allocation of Porthcawl Waterfront, development will I requirements including masterplan development principles and placemaking principle. PLA1 – Page 63). The provision of new residential units, including affordable dwelling of other vital regeneration requirements comprising flood defences, public open space travel links plus education, retail and community facility provision.
	A Placemaking Strategy has been developed and produced of which provides the broader vision for Porthcawl; which aims to create a premier seaside resort of region comprehensive regeneration of this key waterfront site. It proposes a sustainable complementary land uses across the area. It also proposed to retain and improve up space within Griffin Park, whilst creating significant new areas of open space along t with high quality active travel routes that traverse the entire site between the harbou development of the waterfront in this manner will improve the attractiveness of the t work, enhance the vibrancy of the Town Centre and deliver wider socio-economic ber settlement of Porthcawl to thrive and prosper.
	In terms of Salt Lake, development will include a new food store, residential (inclusion supporting commercial uses and leisure. With regards to leisure, an area north of the will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility site could provide an alternative form of leisure/tourism/commercial, year roun Furthermore, the comprehensive enhancement of the Eastern Promenade with ne better landscaping provides an exciting opportunity to create an area that will not only also act, with others, to set a quality benchmark which will also need to be achieved
	In terms of the proposed foodstore, evidence confirms (See Appendix 16 – Retail Stu- function as a town centre and performs well against most indicators of vitality and via has a limited convenience offer which is significantly below the UK average. Althor range of smaller food stores suitable for top-up shopping, there is only one large sup food shopping. This provides limited consumer choice and means that most residents to meet their needs.
	Marketing for a new foodstore was carried out in autumn 2020 whereby numerous received and appraised. A robust selection process in which each bid was carefully as development brief resulted in Aldi Stores Ltd being identified as the preferred bidder. brief required bidders to submit high-quality, bespoke designs for premises that could as well as incorporating appropriate access and active travel arrangements. The development does not prescribe a particular architectural approach, but it does require making", taking in account the historic urban form and scale of the surrounding development designed for human interaction and enjoyment whilst responding to an setting, cultural and heritage of Porthcawl. Cabinet members approved the disposal or and delegated authority to officers to approve the terms of the disposal agreement.

e has been assessed against onsulted upon (See Appendix ssment, sites were examined ition, neighbouring land uses, opportunities. Site promoters s to demonstrate the site's at, only those sites deemed

I be subject to site-specific inciples (See Deposit Policy lings, will enable the delivery ace, leisure, enhanced active

the framework to deliver the onal significance through the le distribution and variety of upon areas of attractive open g the seafront, supplemented our and Trecco Bay. Physical e town as a place to live and penefits that allow the broader

ncluding affordable housing), the harbour within Salt Lake cility is not delivered then the und, wet-weather attraction. new buildings, facilities and only enhance the frontage but ed elsewhere.

Study) that the centre fulfils its viability. However, the centre hough the centre contains a supermarket suitable for main ts must travel to other centres

rous bids (five in total) were assessed against a planning er. The planning development uld act as 'gateway buildings' evelopment brief for the food uire clear attention to "placeng area. This will enable a and celebrating the maritime I of the site to Aldi Stores Ltd,

			The food store site forms a key element of the wider masterplan that has been we Waterfront Regeneration Scheme and is intended to act as a precursor to, and can development across the wider site.
847	As dealt with above	No changes proposed	Comments noted.
996	Where is the planned provision of additional town/beach parking for Porthcawl? Park and ride will not be conducive to a day a the beach, driving tourists to resorts in neighbouring areas.	Where is the planned provision of additional town/beach parking for Porthcawl?	Comments noted. In terms of car parking, it's acknowledged that a sound and rob critical to the success of the regeneration. As part of the strategy, the site will accon car park on the existing Hillsboro car par enabling more ground floor space to be giv development. Consideration should be given to alternative future uses as, overtime, to Porthcawl Waterfront will be principally by public transport including park and ride the number of private vehicles requiring parking facilities. Consultations confirmed concept of a multi storey car park whilst recognising it will change the immediat Hillsboro Place.
			The authority has a strong desire to facilitate and actively encourage a modal shift 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 Po as a boulevard where visitors and locals could arrive at, and depart from the regene The location of the bus terminus will enable access towards the waterfront and also the has also undertaken feasibility work to explore proposals to deliver a bus term regeneration area. The bus terminus project is being brought forward in connection Metro Plus project and is seen as a key element of the wider regeneration plans. In and ride facility in Pyle, whilst it is not likely to be delivered in the short term due to Deal funding programme, the scheme will remain a long term goal for the authority invested into the proposed bus terminus.
107 2	Firstly I am astonished that as a resident who's boundaries are potentially directly involved in the LDP, Part of the proposal would mean a substantial increase to the traffic on Rhych Avenue and the lane behind New Road. These would put an intolerable strain on the junctions of Rhych Avenue and New Road and subsequently cause congestion, noise pollution and air pollution - none of which should be encouraged and promoted by our council as such work and development would naturally generate. The land to the rear of my property as far as the boundary wall to the former Sandy Bay Caravan park has been maintained and landscaped by myself and neighbour at 210 New Road to prevent the flooding caused when the council removed without consultation the trees on that land. When I called my county Councillor to attend a site meeting to show the ingress of water flooding onto my and the adjacent property from the removal of these large trees, his direct response was "The Council	Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront / consultation	Comments noted. The Deposit Plan has been underpinned through the identificati scale of economic growth and housing provision, all of which have been based up based judgements regarding need, demand and supply factors (See Appendix 4 Preferred Strategy Strategic Growth Options). A range of growth scenarios across the period have been analysed and discussed within the Strategic Growth Options Ba considered how the County Borough's demographic situation is likely to change from the most appropriate response for the Replacement LDP. As such the Replate appropriate plan requirement to enable a balanced level of housing and employmer sustainable patterns of growth, support existing settlements and maximise viable aff. 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 existing 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. 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 Apsender Conducive to a settlement their archy. Based upon the consideration of a comprehens Replacement LDP will maintain Porthcawl's role as a Main Settlement capable of settlement

worked up for the Porthcawl catalyst for, future phases of

obust parking strategy will be commodate a new multi storey given over to public realm and ne, the aspiration is that travel de schemes, greatly reducing ed widespread support for the liate outlook of properties on

hift towards increased use of rell as being part of the wider Portway of which will function neration site and town centre. the town centre. The Council erminus within the Porthcawl on with Cardiff Capital Region In terms of the proposed park to the limits of the current City prity. However, funding will be

ation of the most appropriate upon well informed, evidence 42 – Background Paper 2: the whole Replacement LDP Background Paper. This has from 2018-2033 and informed placement LDP identifies an ent provision that will achieve affordable housing 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

Iready benefit from significant o enabling transit orientated Appendix 19) to establish a ensive range of variables the of supporting regeneration-led

<ul> <li>employment provision in the context of its existing population base.</li> <li>employment provision in the context of its existing population base.</li> <li>The plan preparation has involved the assessment of 171 sites. Each candidate site f         the criteria in the Candidate Site Assessment Methodology which was prevail ocatio         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 submit in unber of technical supporting studies         deliverability, sustainability and submit in the Deposition of the constraints and op         were asked to prepare and submit a number of technical supporting studies         deliverability, sustainability and submit in the Deposition in the Deposition         to allow for unhindered recreation is and         to allow for unhindered recreation is and         the criteria in the Candidate Site Assessment.         approblem to the submit of the removes the and         deliverability, sustainability and submit in the Deposition         deliverability, sustainability and submit in the Deposition         deliverability, sustainability and and         requirements including masterplan development yintig deliverability, sustainability and accessibility, provision.         A Placemaking Stratey has been developed and produced of which provides the         travel links pursing vould generate for         the residents is allow. The save the stress         and anguish this parking would generate for         the residents is allow proposed.         Recreation Facilities of which arease the entities in the stress         and anguish this parking would generate for         the residents is allow proposed.         Recreation facilities of which areases the tervice of resisment with         parking stress         becoming deged, causing problems for         bower in asserted massi (i.e. the commet with and nein</li></ul>	F		
<ul> <li>proceeded to perform land drain work to prevent recurrence of the flooding our properties and have maintained the land ever since. Video and photographic ever and photographic ever and photographic ever the provided as required. As for the work to build on the nature reserve at the former Sandy Bay Caravan site, I am in opposition to the provided as required. As for the row to build on the nature reserve at the former Sandy Bay Caravan site, I am area bequeathed to the population of Portncawl to allow for unhindered recreation. It is also the home to wide and diverse flora and fauna and is a particularly important wild meadow for the eco system of Portncawl. Building on this land would generate light and noise pollution, as well as the aforementioned traffic congestion. Additionally, the lass of recreation lind at Griffin Park is also included as allowing a major health and well being proteim. It is durent to carbon with parking becoming a major health and well being protolem. It is durent for the could provide as nony day with cars abandored on banks and residenta link (. The stress is wholly unacceptable. Relocation of the Finishorough Car Parks, this will generate for which erains to create a promised for the residents is wholly unacceptable. Relocation of the Finishorough Car Parks, this will generate index of using a major health and well being proteim is to state allow probes a substitution of the residents is wholly unacceptable. Relocation of the Finishorough Car Parks, this will generate for which areas of restrict to restrict the residents is wholly unacceptable. Relocation of the function of the state restrict wides to careas a promote to restrict the residents is wholly unacceptable. Relocation of the function the state restrict to restrict the residents is wholly unacceptable. Relocation of the function the state relation requirements contexite traverse the entities of which areas to restrict the relation restrict the relateste to constate to remore the stouted to reating the restrict</li></ul>		do not own the land between the lane and	growth, demonstrating capacity for sustainable growth based on its accessibility, av
The plan preparation has involved the assessment of 171 sites. Each candidate site Assessment Methodology which was prevail ocations in the control of the control and the control is a set of the control and			employment provision in the context of its existing population base.
<ul> <li>properties and have maintained the land every for the cand photographic evidence can be provided as required. As for the work to build on the nature reserve at the former Sandy Bay Caravan site, I am in opposition to this. It is an area is a particularly important wild to allow for unhindered recretation II is also to the population of Porthcawl to allow for unhindered recretation II is also the home to wide and diverse fora and fauna and is a particularly important wild meadow for the eco system of Porthcawl.</li> <li>Building on this land would generate light meadow for the eco system of Porthcawl.</li> <li>Building on this land would generate light and noise pollution, as well as the ratific congestion.</li> <li>Additionally, the loss of recreation land at Griffin Park is also unacceptable, as no reglacement is proposed. The LDP also suggests the removal of parking at Salt take so suggests the removal of parking at Salt take so suggests the removal of parking at Salt take and he Hillsborough Car Parks. This will generate many problems for the Town, with parking becoming a major health and well being problem. It is bad enough on a sunny day with cars abandoned on baks and verges, as well as residential stress be comming degard, aussing problems for both visitors and residents alike. The stress the comprehensive regeneration of the Satem Poronearde to the work, enhance the vibrancy of the Town Centre and deliver will exceed to ratio and around the assessment to all and cound music is a scenaria to starking around the sate was not present when they built their properties. It was not present when they built their properies. It was not present when they built properies. It was not present when they built their properies. It was not present when they built from the fair at mose of and area of Porthcawl. Whilis understantion fair the same and around Mackworth Road, for example, that noise muisance was present when they built from the fair at mose muisance was present when they buight theis</li></ul>			
<ul> <li>ever since. Video and photographic evidence can be provided as required. As for the work to build on the nature reserve at the former Sandy Bay Caravan site, I am in opposition to this. It is an area be quested to the population of Porthcawl to allow for unhindered recreation/ It is also the home to wide and diverse flora and fauna and is a particularly important wild meadow for the eco system of Porthcawl. Building on this land would generate light and noise pollution, as well as the alforementioned traffic congestion. Additionally, the loss of recreation land at Griffin Park, is also unacceptable, as no replacement is proposed. The LDP also suggests the removal of parking at Salt lake suggests the removal of parking at Salt lake the hillsborough Car Parks. This will generate many problems for the Town, with parking becoming a major health and well being problem. It is bad enough on a sunny day with care abandoned on banks and varges, as well as residential streets becoming clogged, causing problems for the Town, with parking becoming and residential streets becoming clogged, causing problems for the Town, with parking would generate for the residents is wholly unacceptable. Relocation of the Furnia to the Sand Yaerges, as well as residential streets becoming clogged, causing problems for the residents is wholly unacceptable. Relocation of the Furnia to the Sand Yaer Yaers the entries is also unacceptable. Currently, outside office hours, the funfair in tis current location of the Furnia to the Sand Yaer Yaer Yaer Yaer Yaer Yaer Yaer Yaer</li></ul>			
<ul> <li>evidence can be provided as required. As</li> <li>for the work to build on the nature reserve at the former Sandy Bay Caravan site, I an in opposition to this. It is an area bequeathed to the population of Porthcawl to allow for unhindered recreation! It is also the home to wide and diverse fora and fauna and is a particularly important wild meadow for the eco system of Porthcawl.</li> <li>Building on this land would generate light and noise pollution, as well as the aforementioned traffic congestion.</li> <li>Additionally, the loss of recreation land at Griffin Park is also in unacceptable, as no replacement is proposed. The LDP also suggests the removal of parking at Sal take suggests the removal cassing problems for be comprehensive regeneration of this key waterfront is lie. It proposed a sustainable comprehensive regeneration of this key waterfront is lie. It proposed a sustainable comprehensive regeneration of this key waterfront is lie. It proposed as using problems for becoming dagged, causing problems for both visitors and residentia sitneets becoming dagged, causing problems for both visitors and residentia listneets becoming dagged, causing problems for both visitors and residentia listneets becoming dagged, causing problems for both wisitors and residentia to the Sandy Bay mad the fulfic congestable. The residentis a work while youted for a siture becoming dagged, causing problems for both wisitors and residentia to the Sandy Bay mad and louder no siture to location makes unacceptable. Currently, outside office hours, the funfair in this surent location makes unacceptable. Currently, outside office hours, the funfair in this surent location makes unacceptable. Nused-use development will be encouraged throughout the development. Sandy Bay will accommodate public open space, residential, education provis</li></ul>			
<ul> <li>for the work to build on the nature reserve at the former Sandy Bay Caravans ite, I am in opposition to this. It is an area in opposition to this. It is an area bequeated to the population of Porthcawl were asked to prepare and sutibility. Proceeding this detailed assessment, appropriate were included for allocation in the Deposit Plan.</li> <li>As part of the proposed allocation of Porthcawl Waterfront, development principles and placemaking principales are residential, as no requirements including masterplan development principles and placemaking principales are placemaking principales area at a tast placemaking principales area principales area placemaking principales area principales area placemaking principales</li></ul>		1 8 1	
<ul> <li>at the former Sandy Bay Caravan site, I am bequesthed to the population of Porthcawl to allow for unhidned recreasion? It is also the home to wide and diverse flora and fauma and is a particularly important wild meadow for the ecc system of Porthcawl.</li> <li>Building on this land would generate light and noise pollution, as well as the aforementioned traffic congestion. Additionally, the loss of recreation I and at Griffin Park is also unacceptable, as no replacement is proposed. The LDP also suggests the removal of parking at Salt lake and the Hillsborough Car Parks, this will generate many problems for the Town, with parking becoming a major health and well being problem. It is bad enough on a sumy day with cars abandend on banks and verges, as well as residential streets becoming clogged, causing problems for the form, the stress and anguish this parking would generate for the residents is wholly unacceptable.</li> <li>Relocation of the Furfair to the Sandy Bay Bow in acceptable deform to its current location makes and verges, as well as residential streets becoming clogged, causing problems for both visitors and residents aliks. The stress and anguish this parking would generate for the residents is wholly unacceptable.</li> <li>Relocation of the Furfair to the Sandy Bay Bow in acceptable differently, outside office hours, the furfair in it's current location makes unacceptable. Gurmently, outside office hours, the furfair in the current location makes unacceptable. Gurmently, outside office hours, the furfair in the surrent location makes and areas of Portneawl. Whilst understanding it is far louder for exailents in a daround Mackworth Read, for example, that noise nuise and as avery large part of us as a server and end the start is a stress withen the buogh their propertive. The noise level in creases utwent the buogh in the area and with in the fair at and areas of Portneawl. Whilst understanding it is far louder for exailes is a daround Mackworth Read, for example, that noise</li></ul>			based on any specific issues they raised in terms of their deliverability, general location
<ul> <li>in opposition to this. It is an area bequested to the population of Porthcawl to allow for unhindered recreation? It is also the home to wide and diverse for and fauna and is a particularly important wild meadow for the eco system of Porthcawl.</li> <li>Building on this land would generate light and roise pollution, as well as the aforementioned traffic congestion. Additionally, the loss of recreation land at Griffic Park is also unacceptable, as no replacement is proposed. The LDP also suggests the removal of parking at Salt lake and the Hillsborough Car Parks. this will generate many problems for the Torw, with parking becoming a major health and well being problem. It is bad enough on a sunny day with cars abandoned on banks and verges, as well as residential streets becoming clogged, causing problems for the forw, with high quality active travel routes that traveres the entire site between the harbour development of the Waterfornt in this maner will improve the attractiveness of the twill be ing problem. It is also denough on a sunny day with cars abandoned on banks and verges, as well as residential streets becoming clogged, causing problems for the forw, with high quality active travel routes that traveres between the harbour development will include a new food store, residential (include a new food store, residential (include a new food store, residential (include an atteractive form of leisure, an area nat will not only assesson the fair operates) is also unacceptable. Currently, outside office hours, the fundrar in it's current location makes and evolution which will be accordance with per atting operuntity to travel an area that will not only and louder for resents in all areas of Porthcawl. Whiles the origing provides an atteractive demond for vich are to be achieved in creases substanting it is far louder for resents in all areas of Porthcawl. Whiles the ourse area that will not only and louder for resents in all areas of Porthcawl. Whiles the and probus the and y and into the payin</li></ul>		for the work to build on the nature reserve	
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<ul> <li>to allow for unhindered recreation/ It is also the harbour meadow for the eco system of Porthcawl.</li> <li>Building on this land would generate light and noise pollution, as well as the aforementioned traffic congestion. Additionally, the loss of recreation land at Griffin Park is also unacceptable, as no replacement is proposed. The LDP also suggests the removal of parking at Salt lake and well being problems for the horw, with parking becoming a major health and well being problem. It is bad enough on a sunny day with cars abandoned on banks and verges, as well as residential strets becoming clogged, clausing problems for the toready uside office hours, the furtiar to the Sandy Bay Relocation of the Finufar to the Sandy Bay Bow in a "seasonal basis" (i.e. the current season the fair operates) is allso unacceptable. Relocation of the fair at reased office hours, the furtiar in its current location makes and congride monts in and around Mackworth Road, for example, that noise nuisance was present when I bought their properties. It was not present when</li></ul>		in opposition to this. It is an area	deliverability, sustainability and suitability. Proceeding this detailed assessment,
<ul> <li>the home to wide and diverse flora and fa particularly important will a fauna and is a particularly important will a meadow for the eco system of Porthcawl. Building on this land would generate light and noise politich, as well as the aforemenioned traffic congestion. Additionally, the loss of recreation land at Griffin Park is also unacceptable, as no replacement is proposed. The LDP also suggests the removal of parking at Salt lake suggests the removal of parking biolom. It is an an other Tari is the entire site between the harbourd development of the twork whilst dreating significant new areas of open space along the while states the other on the far at the valar to the two the valar of the two regeneration of the Save yaterform site. It proposes a sustainable complementary land uses across the area, it also proposed. The tore sidents and well well the waterfort in this manner will improve the attractiveness of the twork, enhance the vibrancy of the Town Centre and deliver wider socio-economic ber settlement of Porthcawl to thrive and prosper.</li> <li>In terms of Salt Lake, development will include a new food store, residential (incl supporting would generate for the sister Promenade with the will be safeguarded for a leisure use, potentially a hotal. In the event that a hotel facil site could provide an alternative torm of leisure, with others, to set a quality benchmark which will also need to be acheiveed on the state in propose ato the tark will the transpo</li></ul>		bequeathed to the population of Porthcawl	appropriate were included for allocation in the Deposit Plan.
<ul> <li>fauna and is a particularly important wild meadow for the coc system of Porthcawl.</li> <li>Building on this land would generate light and noise pollution, as well as the atorementioned traffic congestion.</li> <li>Additionally, the loss of recreation land at Griffin Park is also unacceptable, as no replacement is proposed. The LDP also suggests the removal of parking at Salt lake and the Hilisborough Car Parks. this will generate many problems for the Town, with parking becoming a major health and well being problem. It is bad enough on a sunny day with cars abandoned on banks and verges, as well as residential streets becoming clogged, causing problems for the Sandy Bay Boy on a "seasonal basis" (i.e. the current season the fair operates) is also unacceptable. Currently, outside office hours, the funfair in it's current location makes and estension the fair operates in a daround Mackworth Road, for example, that noise nuisance was present when they bought their properties. It was not present when they bought their properties. It was not present when hey bought their properties. It was not present when l bought their properties. It was not present when l bought their properties. It was not present when l bought their properties. It was not present when l bought their properties. It was not present when l bought their properties. It was not present when l loought mine and was a very large part of us selecting this property. The noise level</li> </ul>		to allow for unhindered recreation/ It is also	
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<ul> <li>aforementioned traffic congestion.</li> <li>Additionally, the loss of recreation land at Griffin Park is also unacceptable, as no replacement is proposed. The LDP also suggests the removal of parking at Salt lake and the Hillsborough Car Parks. this will generate many problems for the Town, with parking becoming a major health and well being problem. It is bad enough on a sunny day with cars abadoned on banks and verges, as well as residential streets becoming clogged, causing problems for both visitors and residents alike, The stress and need to the Sandy Bay Bow on a "seasonal basis" (i.e. the current season the fair operates) is also unacceptable. Currently, outside office hours, the funfair in it's current location makes unacceptable. Currently, outside office hours, the funfair in it's current location makes unacceptable for minutes on end) and loud music is a source of minutes on end musing repetitive jingles (constantly playing the same one for minutes on end) and loud music is a source of misance to all areas of Porthcawl. Whils understanding it is far louder for residents in and around Mackworth Road, for example, that noise musance was present when 1 bought mine and was a very large part of us selecting this property. The noise level increases substanially from the fair at</li> </ul>		Building on this land would generate light	of other vital regeneration requirements comprising flood defences, public open space
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<ul> <li>verges, as well as residential streets</li> <li>becoming clogged, causing problems for</li> <li>both visitors and residents alike. The stress</li> <li>and anguish this parking would generate for</li> <li>the residents is wholly unacceptable.</li> <li>Relocation of the Funfair to the Sandy Bay</li> <li>Bowl on a "seasonal basis" (i.e. the current</li> <li>season the fair operates) is also</li> <li>unacceptable. Currently, outside office</li> <li>hours, the funfair in it's current location</li> <li>makes unacceptable amounts of noise –</li> <li>mind numbing repetitive jingles (constantly</li> <li>playing the same one for minutes on end)</li> <li>and loud music is a source of nuisance to all</li> <li>areas of Porthcawl. Whilst understanding it</li> <li>is far louder for residents in and around</li> <li>Mackworth Road, for example, that noise</li> <li>nuisance was present when they bought</li> <li>their properties. It was not present when I</li> <li>bought mine and was a very large part of us</li> <li>selecting this property. The noise level</li> <li>increases substantially from the fair at</li> </ul>		being problem. It is bad enough on a sunny	work, enhance the vibrancy of the Town Centre and deliver wider socio-economic ber
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hours, the funfair in it's current location makes unacceptable amounts of noise – mind numbing repetitive jingles (constantly playing the same one for minutes on end) and loud music is a source of nuisance to all areas of Porthcawl. Whilst understanding it is far louder for residents in and around Mackworth Road, for example, that noise nuisance was present when they bought their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at		season the fair operates) is also	also act, with others, to set a quality benchmark which will also need to be achieved
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mind numbing repetitive jingles (constantly playing the same one for minutes on end) and loud music is a source of nuisance to all areas of Porthcawl. Whilst understanding it is far louder for residents in and around Mackworth Road, for example, that noise nuisance was present when they bought their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at		hours, the funfair in it's current location	Mixed-use development will be encouraged throughout the development. Commerc
playing the same one for minutes on end) and loud music is a source of nuisance to all areas of Porthcawl. Whilst understanding it is far louder for residents in and around Mackworth Road, for example, that noise nuisance was present when they bought their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at		makes unacceptable amounts of noise -	
and loud music is a source of nuisance to all areas of Porthcawl. Whilst understanding it is far louder for residents in and around Mackworth Road, for example, that noise nuisance was present when they bought their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at		mind numbing repetitive jingles (constantly	encouraged. This mix of uses will help bring life and vitality during the day and into the
areas of Porthcawl. Whilst understanding it is far louder for residents in and around Mackworth Road, for example, that noise nuisance was present when they bought their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at		playing the same one for minutes on end)	
<ul> <li>is far louder for residents in and around Mackworth Road, for example, that noise nuisance was present when they bought their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at</li> <li>Outdoor Recreation Facilities of which are to be delivered in accordance with Por Recreation Facilities and New Housing Development Supplementary Planning Guida With respect to traffic, the Council recognises that any development growth will lik demand, and that increased traffic levels and congestion is likely to occur if appro- measures and infrastructure are not delivered. Therefore a Strategic Transpo- undertaken to consider the impact of plan proposals and help guide and inform the</li> </ul>			Sandy Bay will accommodate public open space, residential, education provision ar
Mackworth Road, for example, that noise nuisance was present when they bought their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at Mackworth Road, for example, that noise substantially from the fair at Mackworth Road, for example, that noise substantially from the fair at Mackworth Road, for example, that noise nuisance was present when they bought their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at Mackworth Road, for example, that noise their properties and noise their properties and proposals and help guide and inform the		areas of Porthcawl. Whilst understanding it	
nuisance was present when they bought their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at With respect to traffic, the Council recognises that any development growth will lik demand, and that increased traffic levels and congestion is likely to occur if appro- measures and infrastructure are not delivered. Therefore a Strategic Transpo- undertaken to consider the impact of plan proposals and help guide and inform the		is far louder for residents in and around	Outdoor Recreation Facilities of which are to be delivered in accordance with Po
their properties. It was not present when I bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at With respect to traffic, the Council recognises that any development growth will like demand, and that increased traffic levels and congestion is likely to occur if approximately measures and infrastructure are not delivered. Therefore a Strategic Transport undertaken to consider the impact of plan proposals and help guide and inform the		Mackworth Road, for example, that noise	Recreation Facilities and New Housing Development Supplementary Planning Guida
bought mine and was a very large part of us selecting this property. The noise level increases substantially from the fair at demand, and that increased traffic levels and congestion is likely to occur if appro- undertaken to consider the impact of plan proposals and help guide and inform the			
selecting this property. The noise level measures and infrastructure are not delivered. Therefore a Strategic Transpo undertaken to consider the impact of plan proposals and help guide and inform the			
increases substantially from the fair at undertaken to consider the impact of plan proposals and help guide and inform the			
			•
weekends and after office hours. The allocations by means of modelling and quantifying the transport impact of these prop		•	
		weekends and after office hours. The	allocations by means of modelling and quantifying the transport impact of these prop

#### availability of amenities and

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

I be subject to site-specific inciples (See Deposit Policy lings, will enable the delivery ace, leisure, enhanced active

the framework to deliver the ional significance through the le distribution and variety of upon areas of attractive open g the seafront, supplemented our and Trecco Bay. Physical e town as a place to live and benefits that allow the broader

ncluding affordable housing), the harbour within Salt Lake cility is not delivered then the und, wet-weather attraction. new buildings, facilities and only enhance the frontage but ed elsewhere.

rcial units will be considered and cafes will be particularly the evening.

and commercial. In terms of rate Green Infrastructure and Policy COM10 and Outdoor dance.

likely result in greater travel propriate mitigating transport port Assessment has been ne process of delivering land oposals. The technical notes

proposals of the LDP seem to suggest that	accompanying this assessment demonstrate that the proposed level of development
Porthcawl will cease to be a vibrant seaside	be accommodated within the BCBC Highway Network with suitable mitigation.
town and become a commuter town with	be decommodated within the Debe Highway Network with Suitable Hilligation.
nice seaside views. That would be a great pity as the town brings recreation and enjoyment to people from all over the county and further afield. A plan more focused on sensible access and parking, without impinging on residents quality of life need to be worked on. A free and open consultation needs to be entered into, with	Furthermore, Policy PLA1 ensures that development of the site will require a new r enable access to the Sandy Bay development parcels. Highway improvements will that the principal point of vehicular access for a foodstore is off the Portway rou improvements will also be required of which they must has regard to the requirement Assessment and as identified in the Transport Measures Priority Schedule. In terms of the potential environmental impact, a Phase 1 Habitat Survey has been un determines what ecology constraints may exist within the site. The findings in
residents directly affected not having to rely on Jamie Wallis to notify them.	development would not have any adverse impact. Whilst further surveys will be development of the site is not unacceptably constrained by biodiversity and na Ecological constraints will be mitigated by retaining and providing suitable buffers relict dunes to the rear of Sandy Bay, of which are a nationally protected habitat for protect and enhance.
	Policy PLA1 will also ensure that green infrastructure can be incorporated as an detailed proposals across the regeneration area. There are a number of potential optidesign that could be incorporated as part of future development within the regeneration following:
	<ul> <li>Create an extensive viable network of green corridors and natural habitat throu connects larger or more expansive open spaces for both people and wildlife de assets;</li> </ul>
	<ul> <li>Provide pleasant, safe and linear routes for active travel such as walking and c and health promotion;</li> </ul>
	<ul> <li>Ensure where possible streets and roads are tree-lined or contain soft landso character, habitats and species within the area;</li> </ul>
	<ul> <li>Utilise SUDs to provide additional multi use green space and enhance connect enhanced for biodiversity;</li> </ul>
	<ul> <li>Include bat boxes, bricks or lofts and bird boxes on all housing, to reflect the spectrum of the spec</li></ul>
	<ul> <li>Create natural green spaces and wild or free play areas in the urban setting;</li> <li>Create a network of streets, open spaces and parks, with safe and legible routes schools;</li> </ul>
	<ul> <li>Enhance the transport system and help reduce effects of air pollution through priority habitat, hedgerow, wildflower rich or rough grassland;</li> <li>Provide public access to green infrastructure assets where appropriate; and</li> </ul>
	<ul> <li>Incorporate insect attracting plants, hedgerows, log piles, loggaries and other p refuge/hibernation within structural landscaping and open spaces.</li> </ul>
	In terms of car parking, it's acknowledged that a sound and robust parking strategy w of the regeneration. As part of the strategy, the site will accommodate a new multi sto Hillsboro car par enabling more ground floor space to be given over to public 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 of private vehicles requiring parking facilities. Consultations confirmed widespread s

#### nt detailed within the LDP can

v roundabout and link road to vill also be required to ensure roundabout. Off-site highway ents arising from the Transport

undertaken, of which robustly indicate that the proposed be undertaken, the proposed nature conservation issues. rs to habitats, particularly the or which BCBC are obliged to

an intrinsic element of future ptions for green infrastructure eneration area including the

roughout development which designed around existing site

l cycling for utility, recreation

lscaping appropriate to local

ectivity between habitats for

becies within the area;

es linking them to homes and

gh the provision of verges of

places of shelter for wildlife

will be critical to the success storey car park on the existing plic realm and development. ion is that travel to Porthcawl greatly reducing the number d support for the concept of a perties on Hillsboro Place.

The authority has a strong desire to facilitate and actively encourage a modal shi public transport and the provision of a new bus terminus is integral to this as wel Future Wales Plan. As such, a new 'bus terminus' may also be located along the P
as a boulevard where visitors and locals could arrive at, and depart from the regent The location of the bus terminus will enable access towards the waterfront and also thas also undertaken feasibility work to explore proposals to deliver a bus term regeneration area. The bus terminus project is being brought forward in connection Metro Plus project and is seen as a key element of the wider regeneration plans. In and ride facility in Pyle, whilst it is not likely to be delivered in the short term due to Deal funding programme, the scheme will remain a long term goal for the authorit invested into the proposed bus terminus.
In terms of consultation, it is the view of the Council that the overall objectives of the Scheme (CIS) as originally set out in with the approved Delivery Agreement, include It is also considered that the LDP has been prepared in accordance with the LDP set out in the Development Plans Manual (Edition 3).
The Council previously consulted the public on the Preferred Strategy of which was to 8th November 2019. Following the public consultation period the Council w 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 with included:
<ul> <li>A Legal Notice was placed within the Glamorgan Gazette on 3rd June 2021</li> <li>The package of consultation documents were been made available online via Council's Website (www.bridgend.gov.uk/ldpconsultation). Respondents welectronic survey online to make a formal representation.</li> <li>Printed reference copies were placed within public facing Council buildings, i County Borough (fixed and mobile), subject to social distancing guidelines. also available to view at the Council's Civic Offices in Angel Street, Bridgen only as the offices had not re-opened to the public due to the pandemic. Hai were also been made available at these locations for members of the public</li> <li>Dissemination of hard copies of information to individuals. Members of the copy of the survey by post to complete by hand (free of charge). There was a of the whole Deposit Plan to cover printing and postage costs for such a larg</li> <li>Every individual and organisation on the LDP Consultation Database was (depending on their proference) to inform them of the availability of</li> </ul>
(depending on their preference) to inform them of the availability of Approximately 500 representors were contacted, provided with details of ho consultation documents and how to respond. As the consultation progress were been informed of and added to the database upon request.

hift towards increased use of ell as being part of the wider Portway of which will function neration site and town centre. the town centre. The Council rminus within the Porthcawl on with Cardiff Capital Region In terms of the proposed park o the limits of the current City rity. However, funding will be

the Community Involvement ding the CIS have been met. 'Preparation Requirements'

as held from 30th September was required to consider all ng the content of the deposit – Preferred Strategy & Initial embers of Council.

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

via Bridgend County Borough were able to complete an

, including every library in the s. The reference copies were and, although by appointment ard copies of the survey form to complete by hand.

e public were able request a a £25 charge for a hard copy ge document.

as notified by letter or email f the Deposit Consultation. ow to access the package of ssed, additional representors

			<ul> <li>Planning Aid Wales were commissioned by the Council to run remote engage and Community Councils in Bridgend County Borough.</li> <li>A comprehensive social media plan was devised. A series of social media periodically on Facebook, LinkedIn and Twitter. They drew attention to different the County Borough throughout the consultation period.</li> <li>Planning Officers have presented the consultation remotely to established we Bridgend Community Cohesion and Equalities Forum and Youth Forum.</li> <li>In place of face to face public drop in sessions, representors were able to appointments with planning officers to discuss any queries/concerns they may to do this by emailing ldp@bridgend.gov.uk or telephoning 01656 643633.</li> </ul>
329	No	No changes	Posters were sent to all Town and Community Councils to display on their notice bo Comments noted.
		proposed	
223	Whilst it is acknowledged that all three are main settlements, as evidenced within the Settlement Assessment Study 2019, revised 2021 and reflected in the spatial strategy in the DCD, Llanmoor remain cautious over the level of housing being distributed to these settlements given the lack of delivery in the extant LDP.		
	<b>Porthcawl</b> In respect of Porthcawl, Llanmoor are aware that work has now commenced on the Porthcawl Sandy Bay Coastal Scheme which is anticipated to complete in May 2022 and acknowledge the Council now have total control over Phase 1 (Salt Lake) with partnership options being explored to bring forward development. Phase 2 (Sandy Bay/Coney Beach) is jointly promoted by the Council and developer and it is recognised a land owners agreement is in place with a disposal strategy being finalised and it is anticipated that the site will be brought to the market shortly. Whilst Llanmoor acknowledge that the sea wall defences are being implemented and are due to be completed in 2022 in light of the past delays in bringing the site forward Llanmoor consider that the housing trajectory is more likely to commence later in the plan period to allow for the completion of the works and the disposal of the land. It is therefore considered the trajectory is optimistic and that in reality delivery on site would not begin until 2027-28 at the earliest.	Change to housing trajectory for Porthcawl Waterfront	Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subje of its sustainability, deliverability and viability credentials in the same manner as all has been a substantial change in circumstances to demonstrate the site can be deliv LDP period and as indicated within the housing trajectory. The Council has now purc over Phase 1 (Salt Lake), coastal defence works are progressing on site and are of end of 2022. Partnership options are currently being explored in order to bring forwa has commenced in relation to procurement mechanisms and a formal procurement commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted b owner and a significant majority of the site is not reliant on coastal defence works owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now nor be unable to progress and come forward together, as further evidenced by the extense evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bo supported.

gagement events for all Town

media posts were released erent thematic areas / parts of

working groups, including the

o book one to one telephone hay have had. They were able

oards.

bject to robust re-assessment II other candidate sites. There elivered over the Replacement urchased and has total control e due to be completed by the ward development, initial work nent exercise is scheduled to d by the Council and a private orks to come forward. A lande is likely to be brought to the preason why both phases will ensive supporting deliverability both unsubstantiated and not

 1		1
Land East of Pyle Despite Pyle being a main settlement and considered a Sustainable Growth Area within the DCD spatial and growth strategies, Llanmoor has undertaken a review of the evidence base documents in respect of Land East of Pyle (Allocation Ref: PLA5) and remain concerned over the site- specific deliverability and the affect this could have on the robustness of the housing trajectory; both of which are essential considerations over housing delivery for the next plan period. Llanmoor consider that the proposed quantum of development of 2,000 homes is a strategic issue which should be considered through a Strategic Development Plan (SPD). Whilst there is no defined figure within Planning Policy Wales (PPW) Edition 11 (2021) on what constitutes a strategic level of housing, the Development Plan Manual (DPM), Edition 3 (2020) sets out the content of an SDP on page 215 in terms of identifying spatial areas to accommodate growth above a set threshold and gives the example of 1,000 dwellings. Paragraph 10.7 states SDPs should set thresholds below which places and or issues should not be included in the plan. Whilst there is no SDP in place, the DPM provides an indication that a threshold of 1,000 dwellings is considered a strategic issue by Welsh Government a point which Llanmoor agrees. Therefore, Llanmoor consider the allocation of 2,000 dwellings is not a matter for the Replacement LDP to consider but to be addressed through a SDP as a development of that scale in a very accessible location is likely to have cross boundary implications. Candidate Site Assessment The Candidate Site Assessment Report (2021) notes that the site is located on the periphery of the settlement for North Cornelly, a Sustainable Growth Area. The Sustainability Appraisal identifies 'SSSI (Site of Special Scientific Interest)' and 'flood risk' as a constraint that would prevent development from coming forward. The northern section of the site is located within	Allocation to be considered via the forthcoming SDP rather than the Replacement LDP	As documented in the Candidate Site Assessment, the Land East of Pyle s demonstrated delivery in accordance with the requirements set out in the Developme plethora of evidence has been provided to the Council to support its delivery investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora of requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close d site-promoters, followed by effective collaboration and involvement with a range of ste Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasing of sites those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land East of Pencoed trajectory is bo supported. Moreover, work on the SDP has not yet commenced, regulations are yet to be finalis not yet been defined through this process. The Bridgend Replacement LDP is being forthcoming SDP and is bound by a Delivery Agreement. A range of plan preparation in the Review Report before work on the Replacement LDP began. The Review Re Council undertakes a full review of the existing LDP on an individual Local Planning wherever possible working collaboratively with other LPAs to produce a joint evidem to prepare a SDP. Whilst the Council remains committed to the SDP process, th demonstrated that Land East of Pyle is both viable and deliverable during the R accordance with the Growth and Spatial Strategy. The representor's concerns implications are unsubstantiated, especially considering Bridgend County Borougf dialogue with Neath Port Taibot County Borough Council through plan preparation Borough Council has submitted formal representations on the Bridgend Deposit Plat this propos

site promoter has robustly nent Plans Manual. A detailed ry, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new dialogue with the respective stakeholders at a Stakeholder r, there were no outstanding s in the plan period (including sion of the Stakeholder Group both unsubstantiated and not

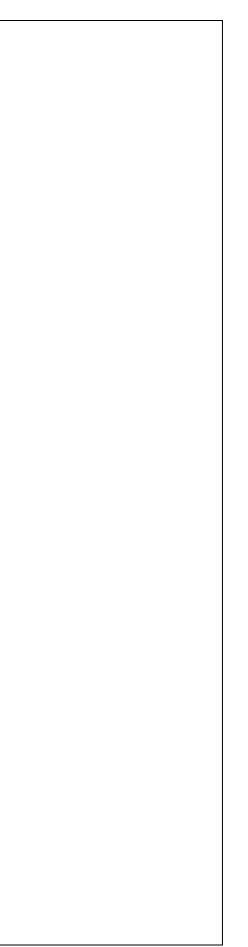
ised and site thresholds have ag prepared in advance of the tion options were considered deport recommended that the ag Authority (LPA) area basis, ince base and with the region the site promoter has clearly Replacement LDP period, in s regarding cross boundary agh Council has remained in on. Neath Port Talbot County Plan and cite no objections to

ring the Replacement LDP is appropriate to delay progress

Flood Zone C2. TAN15 states that only less vulnerable development should be considered subject to application of justification test for sites within Flood Zone C2. However, the identified constraints are located on the periphery of the site and would require further assessment as part of Stage 2, to determine whether the constraints can be satisfactorily overcome. However, Appendix 7 of the Assessment goes on to state the 'site has the potential to provide new primary schools and 2,000 homes in Pyle, of which possesses a wide range of services and facilities in addition to sustainable transport links. This site will make an important contribution to meeting the housing need of the County Borough. A supporting masterplan and planning statement identifies and mitigates potential constraints relating to connectivity to Pyle via a proposed foot bridge in addition to taking into account potential flood risk'. Whilst there is some dispute regarding the true constraint free nature of the site. Llanmoor note that more fundamentally that for such a significant proposed allocation, there is no developer involvement. The site has been promoted via some, not all, of the landowners and there is currently no confirmation that a developer is engaged to take the site forward. Given the nature and the size of the proposal Llanmoor would have considered that this was a prerequisite to progressing. DCD Sustainability Appraisal The Full Sustainability Appraisal (2021) of the DCD considers that the likely significant beneficial effects of the proposal will outweigh the likely significant adverse effects on cultural heritage, specifically impacts on important archaeological sites. However, it is understood from the HER notes that the site is subject to Medieval Ridge & Furrow as well as a site of a cross base and a World War 2 Machine gun post. Furthermore, the site forms part of a wider area enclosed in the Medieval period as a monastic grange. The Eastern area is also part of an extensive deserted village



represented by the Scheduled Stormy	
Motte, hut platforms and other earthwork	
features. Whilst the promoter has confirmed	
geophysical survey will be undertaken to	
inform mitigation the likely impact on	
archaeological remains unknown and this	
will have consequences to the developable	
areas of the site and deliverability in terms	
of the proposal's viability. Aside from the	
significant adverse effect on important	
archaeological sites, it is noted that Table	
D.1B Detailed SA of Candidate Housing	
Sites also scores the site negatively against	
the following criteria:	
<ul> <li>Proximity to health facilities</li> </ul>	
– Proximity to Primary Education	
Infrastructure	
<ul> <li>Proximity to Congestion Pinch Points</li> </ul>	
- Water Supply Score	
– Sewerage Score	
<ul> <li>Proximity to European Sites (recreational</li> </ul>	
pressure)	
· ,	
<ul> <li>Proximity to European Sites (SAC)</li> </ul>	
- Proximity to SSSI	
<ul> <li>Proximity to Ancient Woodland</li> </ul>	
<ul> <li>Proximity to RIGS</li> </ul>	
– Presence of Valued Habitats and Species	
<ul> <li>Proximity to Flood Risk Zones</li> </ul>	
<ul> <li>Proximity to Main Rivers and Lakes</li> </ul>	
- Previously Developed Land or Greenfield	
Land	
-Proximity to Scheduled Monuments	
<ul> <li>Proximity to Listed Buildings</li> </ul>	
<ul> <li>Proximity to SLA or Heritage Coast</li> </ul>	
- Visual Amenity Impact	
It is therefore evident that substantial further	
technical work will be required to bring	
forward development of the site with	
potential consequence in terms of viability	
and deliverability of the scheme.	
Infrastructure	
The suitability of the Strategic Growth Area	
(SGA) to accommodate new residential	
development is largely predicated on the	
presence of Pyle railway station, which	
offers a genuine sustainable transport	



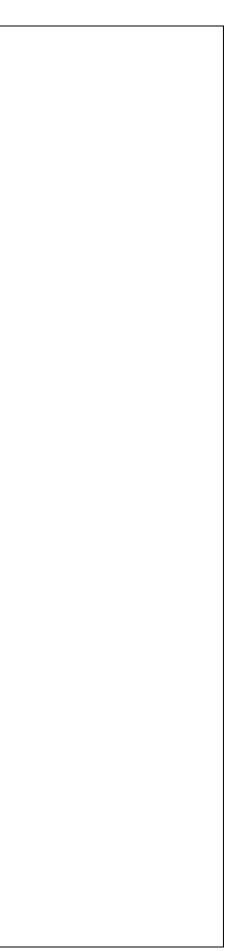
option for residents, along with employment and retail facilities. However, the strategic site at land east of Pyle is physically detached from the grouped settlement and is not well placed to take advantage of these sustainability credentials. The A4229 (and its associated landscape buffers), the large roundabout at the northern end of the A4229 and the railway line all represent significant physical barriers between the site and the rest of the settlement. Llanmoor remain unconvinced that there is sufficient infrastructure currently in place to accommodate the level of growth proposed on land east of Pyle.

The Settlement Assessment does demonstrate that Pyle, amongst others, does objectively demonstrate a high level of accessibility that could be capable of accommodate growth in an integrated and co-ordinated manner. However, the Assessment goes on to state realisation of this phenomenon would depend on a more comprehensive assessment of transport capacity. A point which Llanmoor agrees.

Due to COVID restrictions it is noted that landowners, developers and promoters have been unable to undertake full transport assessments. As a consequence, the full impact on highway network remains unknown and the cost of mitigation, another factor which would affect viability, remains unknown. Furthermore, the Infrastructure Delivery Plan 2021 sets out in Appendix 1 the required infrastructure to support strategic sites. Focussing purely on transport infrastructure identified to support the delivery of Land East of Pyle the majority of elements that are to be delivered are waiting to have costs established or to be provided as part of highways works. However, the new footbridge over the railway line has two options identified; 1) £1,239,549 or 2.) £2,847,560 which have been provided in October 2020. It is also noted that other infrastructure projects include:



i. Improvements to Pyle railway	
station;	
ii. Proposed extension to the park	
and ride facility from 25 bays by a	
minimum of 32 spaces,	
iii. A feasibility study to relocate the	
station.	
The estimated cost of the station relocation	
is identified to be £19.7m. Whilst land is	
being safeguarded for the relocated station	
it will be dependent upon grant funding.	
These are significant costs which will have	
a bearing on the viability and deliverability	
of the allocation.	
The Estimated Additional Commuter Trips	
and Rail Infrastructure background paper	
provides an analysis of data collected by	
Transport for Wales (TfW) in October 2020	
to assist the Replacement LDP in informing	
what demand can be expected on rail	
infrastructure as a result of the	
implementation of strategic development.	
Given the ongoing COVID lockdowns that	
have been in place, Llanmoor question the	
reliability of the data collected and its	
outcomes as it does not necessarily reflect	
typical travel patterns.	
Table 1: Strategic Candidate Site Quantum	
of Development identifies land east of Pyle	
of delivering 1,000 units. Whilst this is true	
for the current plan period, Pyle is actually	
identified to deliver 2,000 units in total which	
would have a greater impact on rail	
infrastructure. As identified above,	
Llanmoor consider the delivery of 2,000	
units to be a strategic matter and as part of	
that consideration it is surely necessary for	
the technical evidence base documents to	
consider the full impact of the whole	
scheme to reach a robust assessment on	
the true impacts on infrastructure. As part of	
the literature review undertaken by the	
paper, it is noted that Bridgend County	
Borough Council commissioned an initial	
feasibility study for the re-location of the	
existing Pyle railway station to a more	
sustainable location, not only to increase	
the size of the station but also the proximity	



to the land east of Pyle. Whilst it was considered to be technically feasible, it would incur significant cost, take approximately 5 years to deliver and overall demand at a new station was estimated as similar to the existing station for the same level of train service. The main difference between the relocated station and the existing station was the highways access and parking. The main alternative to the relocation option is to improve the access and size of the car park to the existing station site which offers better value for money. It is therefore evident that the position relating to key infrastructure to support the development on land east of Pyle remains unknown and the timescales involved in relocating the site will have consequences to the housing trajectory for the plan period. In assessing 1,000 units on land east of Pyle, the paper anticipates 43 additional commuter trips travelling to Cardiff. Whilst this is based on a 50/50 split between sustainable and non-sustainable modes i.e., the private car, the services are already close to maximum seated capacity on average with space to stand. Therefore, if consideration was given 2,000 units being delivered on land east of Pyle the train services would be over capacity.

#### Housing Trajectory

It is noted that housing trajectory set out in Appendix 1 of the DCD and the Housing Trajectory Background Paper for Land East of Pyle include a total of 1,057 units in the plan period 2018-2033 with a further 943 units beyond the Replacement LDP plan period. Given the significant number of houses proposed to be carried forward to the following plan period, Llanmoor do not consider it appropriate to allocate housing of this scale across two development plan periods to justify an allocation in the current DCD. This further justifies its allocation as being more appropriate for an SDP. Similarly to other allocations, the trajectory does appear to be optimistic in the delivery of homes beginning in 2025 when there is no known developer on board, and not all of



		•	
	the landowning parties are involved in promoting the site. In light of the unknown costs of infrastructure requirements outlined above, the Land East of Pyle is not considered to be free from physical constraints or economically viable. A significant amount of work will be required to enable the site to be deliverable. In this context Llanmoor question the delivery of housing shown to commence in 2025. Even if the railway station is not relocated, it is likely that the delivery of the footbridge should be in place prior to the delivery of a first phase of housing. On this basis, it is considered more realistic that the first tranche of housing would commence later in the plan period, such as 2028-29 with a similar rate of completions as the promoter suggest.		
	<b>Conclusion</b> Taking the above points into consideration, it is clear to Llanmoor that there are fundamental questions which remain unanswered regarding the viability of the allocation on land east of Pyle. Notwithstanding Llanmoor's view that the allocation of 2,000 units is a matter of a SPD and not for consideration in the Replacement LDP, it evident that substantial work is required to demonstrate the economic viability of the scheme and the ability to deliver the required infrastructure to enable the scheme to be delivered. At this stage, Llanmoor remain unconvinced that the site is free from constraints or is economically viable to warrant its allocation in the Replacement LDP. In the event, that the site remains allocated, the delivery of housing in the plan period needs to move back to at least 2028- 29.		
610	Yes unless you're planning to provide an extra GP surgery and employ more nurses and GP's then the community will suffer	Concerns regarding provision of GP Surgeries	With regards to the provision of additional GP surgeries, the Council has be Morgannwg University Health Board from the outset of the Replacement LDP proce to ensure the level and spatial distribution of growth proposed was clarified to help provision. As part of Stage 3 of the Candidate Site Assessment, the health board bodies were invited to provide comments in respect of those sites identified as su and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately healthcare services, close working relationships will continue and be maintained

been engaging with Cwm Taf ocess. Early meetings were held elp facilitate alignment of service oard amongst other consultation suitable for future development rely control provision of primary ned with Cwm Taf Morgannwg

			University Health Board. This will be key to service provision planning as site allocat progress.
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	No specific comments to make.	No changes	Comments noted
287	No comments	No changes proposed	Comments noted
308	Whilst it is acknowledged that all three are main settlements, as evidenced within the Settlement Assessment Study 2019, revised 2021 and reflected in the spatial strategy in the DCD, Llanmoor remain cautious over the level of housing being distributed to these settlements given the lack of delivery in the extant LDP.	See below.	
	<b>Porthcawl</b> Llanmoor are aware that work has now commenced on the Porthcawl Sandy Bay Coastal Scheme which is anticipated to be completed in May 2022 and acknowledge the Council now have control over Phase 1 (Salt Lake) with partnership options being explored to bring forward development. Phase 2 (Sandy Bay/Coney Beach) are jointly promoted by the Council and a developer and it is recognised a land owners agreement is in place with a disposal strategy to bring to the market shortly. Whilst Llanmoor acknowledge that the sea wall defences are being implemented and are due to be completed in 2022 in light of the past delays in bringing the site forward Llanmoor consider that the housing trajectory remains overly optimistic and is more likely to commence later in the plan period, allowing for the completion of the works and the disposal of the land. It is therefore considered the trajectory is overly optimistic and that in reality delivery on site would not begin until 2027-28 at the earliest.	Change to housing trajectory for Porthcawl Waterfront	Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subje of its sustainability, deliverability and viability credentials in the same manner as all of has been a substantial change in circumstances to demonstrate the site can be deliv LDP period and as indicated within the housing trajectory. The Council has now purc over Phase 1 (Salt Lake), coastal defence works are progressing on site and are of end of 2022. Partnership options are currently being explored in order to bring forwa has commenced in relation to procurement mechanisms and a formal procurement commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted b owner and a significant majority of the site is not reliant on coastal defence work owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no r be unable to progress and come forward together, as further evidenced by the extense evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bot supported.
	Land East of Pyle Despite Pyle being a main settlement and considered a Sustainable Growth Area within the DCD spatial and growth	Land East of Pyle Allocation to be considered via the	As documented in the Candidate Site Assessment, the Land East of Pyle s demonstrated delivery in accordance with the requirements set out in the Development plethora of evidence has been provided to the Council to support its delivery

### ations within the Deposit Plan

bject to robust re-assessment all other candidate sites. There elivered over the Replacement urchased and has total control re due to be completed by the ward development, initial work ment exercise is scheduled to d by the Council and a private orks to come forward. A lande is likely to be brought to the o reason why both phases will ensive supporting deliverability both unsubstantiated and not

e site promoter has robustly ment Plans Manual. A detailed ery, including numerous site

strategies, Llanmoor has undertaken a review of the evidence base documents in respect of Land East of Pyle (Allocation Ref: PLA5) and remain concerned over the site – specific deliverability and the affect this could have on the robustness of the housing trajectory; both of which are essential considerations over housing delivery for the next plan period. Llanmoor further consider that the proposed quantum of development of 2,000 homes should be considered a strategic issue which should proceed through a Strategic Development Plan (SPD). Whilst there is no defined figure within Planning Policy Wales (PPW), Edition 11 (2021) on what constitutes a strategic level of housing, the Development Plan Manual (DPM), Edition 3 (2020) sets out the content of an SDP on page 215 in terms of identifying spatial areas to accommodate growth above a set threshold and gives the example of 1,000 dwellings. Paragraph 10.7 states SDPs should set thresholds below which places and or issues should not be included in the plan. Whilst there is no SDP in place, the DPM provides an indication that a threshold of 1,000 dwellings is considered a strategic issue by Welsh Government. Therefore, Llanmoor consider the allocation of 2,000 dwellings is not a matter for the Replacement LDP to consider, at this scale it is likely to have cross boundary implications and should better be addressed through a SDP.	forthcoming SDP rather than the Replacement LDP	investigations and appraisals, masterplans, a viability assessment, a transport consideration of s106 requirements, infrastructure and costs. This process has provide the site is realistically deliverable, considering the full plethora of requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close disite-promoters, followed by effective collaboration and involvement with a range of stal Group Meeting. As documented within the Housing Trajectory Background Paper, in matters of disagreement on the completion figures or the timing and phasing of sites in those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land East of Pencoed trajectory is bott supported. Moreover, work on the SDP has not yet commenced and site thresholds have not yet process. The Bridgend Replacement LDP is being prepared in advance of the forth by a Delivery Agreement. A range of plan preparation options were considered in the F on the Replacement LDP began. The Review Report recommended that the Council the existing LDP on an individual Local Planning Authority (LPA) area basis, w collaboratively with other LPAs to produce a joint evidence base and with the region the Council remains committed to the SDP process, the site promoter has clearly de of Pyle is both viable and deliverable during the Replacement LDP period, in accord Spatial Strategy. The representor's concerns regarding cross boundary implicat especially considering Bridgend County Borough Council has remained in dialogu. County Borough Council through plan preparation. Neath Port Talbot County Borough Council through plan preparation. Neath Port Talbot County Borough Council through plan preparation. Neath Port Talbot County Borough Council through plan preparation and cite no objections to this support the Deposit Plan.

port assessment and due provided a high degree of of associated development to deliver high-quality new dialogue with the respective stakeholders at a Stakeholder r, there were no outstanding s in the plan period (including sion of the Stakeholder Group oth unsubstantiated and not

yet been defined through this thcoming SDP and is bound e Review Report before work cil undertakes a full review of wherever possible working on to prepare a SDP. Whilst demonstrated that Land East ordance with the Growth and cations are unsubstantiated, ogue with Neath Port Talbot rough Council has submitted this proposed allocation and

ing the Replacement LDP is appropriate to delay progress

25	<ul> <li>Land East of Pyle cannot be considered to be free from physical constraints or economically viable. A significant amount of work will be required to enable the site to be deliverable. In this context Llanmoor question the delivery of housing shown to commence in 2025, and consider it more realistic to consider the first tranche of housing would commence later in the plan period, around 2028-29 with a similar rate of completions as the promoter suggest.</li> <li>Whilst BDW support the development of this mixed-use regeneration site, and understands that progress is now being made in terms of the necessary flood defence works at the site, taking into account lead-in times for planning and marketing and all the infrastructure works that are required, it is unlikely that the first tranche of housing completions would start coming forward in 2023 as projected. It is therefore considered that the housing projections are not realistic and it is unlikely that any meaningful housing will be delivered at the Waterfront site until the end of the plan period. There is a need for the Deposit Draft RLDP to include other housing sites and reduce its reliance on housing being delivered from the site.</li> </ul>	Change to housing trajectory for Porthcawl Waterfront.	The total housing provision, and spatial distribution thereof, has been subject to site- enable development of the housing trajectory. The trajectory was prepared initially the respective site-promoters, followed by effective collaboration and involvement v at a Stakeholder Group Meeting. As documented within the Housing Trajectory Bac no outstanding matters of disagreement on the completion figures or the timing and period (including those sites with planning permission and new housing allocations) Stakeholder Group Meeting. Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subje of its sustainability, deliverability and viability credentials in the same manner as all of has been a substantial change in circumstances to demonstrate the site can be deliv LDP period, as indicated within the housing trajectory. The Council has now purch over Phase 1 (Salt Lake), coastal defence works are progressing on site and are of end of 2022. Partnership options are currently being explored in order to bring forwa has commenced in relation to procurement mechanisms and a formal procureme commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted b owner and a significant majority of the site is not reliant on coastal defence work owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now nor be unable to progress and come forward together, as further evidenced by the extense evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bo
17	0 The plan is heavily reliant on the Porthcawl site, yet this site has failed to deliver for a significant period of time even with planning permission being in place and various masterplans. HBF considers that the number of units allocated on this site should be reduced.	Reduction in the number of units for Porthcawl Waterfront	Porthcawl Waterfront was subject to robust re-assessment of its sustainability, credentials in the same manner as all other candidate sites. There has been circumstances to demonstrate that this site can be delivered over the Replacement within the housing trajectory (refer to the Housing Trajectory Background Paper Background Paper and Candidate Site Assessment). The Council has now purchased and has total control over Phase 1 (Salt Lake), progressing on site and are due to be completed by the end of 2022. Partnership explored in order to bring forward development, initial work has commenced mechanisms and a formal procurement exercise is scheduled to commence shortly. F Beach) is being jointly promoted by the Council and a private owner and a significar reliant on coastal defence works to come forward. A land-owners agreement is in p being finalised and the site is likely to be brought to the market shortly. With Phase in parallel, there is now no reason why both phases will be unable to progress and further evidenced by the extensive supporting deliverability evidence. As such Porthcawl Waterfront's unit capacity is both unsubstantiated and not supported.

te-specific phasing analysis to ly through close dialogue with t with a range of stakeholders background Paper, there were nd phasing of sites in the plan hs) following conclusion of the

bject to robust re-assessment II other candidate sites. There elivered over the Replacement rchased and has total control e due to be completed by the ward development, initial work nent exercise is scheduled to d by the Council and a private orks to come forward. A lande is likely to be brought to the preason why both phases will ensive supporting deliverability both unsubstantiated and not

ty, deliverability and viability een a substantial change in nent LDP period, as indicated per, Spatial Strategy Options

e), coastal defence works are ip options are currently being d in relation to procurement y. Phase 2 (Sandy Bay / Coney icant majority of the site is not n place, a disposal strategy is se 1 and Phase 2 now running nd come forward together, as ch, the proposed change to

116 5	<b>Re-consideration of the Porthcawl</b> <b>Waterfront Allocation</b> It is no surprise that larger sites take longer to develop – this is confirmed by research undertaken by Lichfields (2016) which recognises that these 'make an attractive proposition for plan-makers' yet, crucially, notes how 'their scale, complexity and (in	Re-allocate Porthcawl Waterfront as a Long-Term Regeneration Site	The total housing provision, and spatial distribution thereof, has been subject to site-se enable development of the housing trajectory. The trajectory was prepared initially the the respective site-promoters, followed by effective collaboration and involvement with at a Stakeholder Group Meeting. As documented within the Housing Trajectory Back no outstanding matters of disagreement on the completion figures or the timing and p period (including those sites with planning permission and new housing allocations) Stakeholder Group Meeting.
	notes how 'their scale, complexity and (in some cases) up-front infrastructure costs means they are not always easy to kick- start'. Unfortunately, this has been the case for current allocations such as the Porthcawl Waterfront which, as recognised by the Local Development Plan Preferred Strategy Consultation Report, has experienced 'inherent difficulties with the delivery of the Waterfront Regeneration Area'. The site is currently a strategic allocation in the adopted LDP and was a strategic allocation in the Unitary Development Plan (UDP) which was adopted in 2005. Despite the consistent prioritisation of this site by BCBC, at the time of the Local Development Plan Preferred Strategy Consultation Report (2020), the site had only delivered 13 units actively contributing to the LPA's inability to maintain a healthy housing-land supply. Since the publication of this document, BCBC have attempted to overcome the historic constraints associated with the Porthcawl Waterfront site, such as ownership. While, in the interest of deliverability, we wish this were the case, the historic undeliverability of the site and its inability to deliver much-needed residential development must be taken into account. Paragraph 4.2.18 of PPW11 notes that 'housing led regeneration sites' such as the Porthcawl Waterfront site, 'can sometimes be difficult to deliver, making timescales for development hard to specify.' In light of this, PPW 11 suggests that 'where deliverability is considering to be an issue, planning authorities should consider excluding such sites from their housing supply so that achieving their development plan housing requirement is not dependent on their delivery'. In this way, as the Porthcawl site		Before being rolled forward' into the Deposit Plan, Porthcawl Waterfront was subjet of its sustainability, deliverability and viability credentials in the same manner as all o has been a substantial change in circumstances to demonstrate the site can be delive LDP period, as indicated within the housing trajectory. The Council has now purch over Phase 1 (Salt Lake), coastal defence works are progressing on site and are d end of 2022. Partnership options are currently being explored in order to bring forwar has commenced in relation to procurement mechanisms and a formal procuremen commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted by owner and a significant majority of the site is not reliant on coastal defence works owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no re be unable to progress and come forward together, as further evidenced by the extensis evidence. In summary therefore, the proposal to alter Porthcawl Waterfront to a Allocation is both unsubstantiated and not supported.

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ject to robust re-assessment I other candidate sites. There livered over the Replacement chased and has total control e due to be completed by the vard development, initial work ent exercise is scheduled to by the Council and a private this to come forward. A landis likely to be brought to the reason why both phases will nsive supporting deliverability a Long-Term Regeneration

	Waterfront Allocation	Porthcawl Waterfront as a	enable development of the housing trajectory. The trajectory was prepared initial the respective site-promoters, followed by effective collaboration and involvement at a Stakeholder Group Meeting. As documented within the Housing Trajectory E
306	sites, to include smaller, more affordable market properties' as opposed to the larger style properties, which 'have become commonplace locally'. In this way, by including a range of different sized sites in the allocation, a variety of tenures and house styles could be met supporting the aspirations of National Policy and the recommendations of the Local Housing Market Assessment (2021). <b>Re-consideration of the Porthcawl</b>	Re-allocate	The total housing provision, and spatial distribution thereof, has been subject to si
	homes cannot depend on a site which has historically undelivered for over 30 years and should not directly make up the immediate housing supply. By removing Porthcawl Waterfront, and its 1355 units, as a Strategic Site, in line with the guidance provided by National Policy, it is evident that an immediate requirement of units would need to be provided. Whilst it is recognised that this would not be substantial to the point of requiring the inclusion of another strategic site in the allocations, it is evident that the allocation of small-medium sites to support the remaining four strategic sites is crucial to maintain an immediate housing supply. This approach is in line with the Local Housing Market Assessment (2021) which notes the 'continuing difficulties younger households face in accessing home ownership' and advocates for 'a more balanced mix of dwellings on new build		
	has been unable to deliver for the last thirty years, and across different local development plans, it is not certain that a strategy to deliver 1020 market units and 335 affordable units may likely fail or, at the very least, not deliver in the appropriate time-frame impacting negatively on the housing supply and deliverability. In light of this, we propose classifying the Porthcawl Waterfront site as a Long-Term Regeneration Sites in line with the development opportunities in Maesteg & The Llynfi Valley. Ultimately, as outlined by the National Policy, the deliverability of 1355 of both market and affordable new		

site-specific phasing analysis to tially through close dialogue with ent with a range of stakeholders y Background Paper, there were

It is no surprise that larger sites take longer	Long-Term	no outstanding matters of disagreement on the completion figures or the timing and
	Regeneration Site	period (including those sites with planning permission and new housing allocations)
undertaken by Lichfields (2016) which		Stakeholder Group Meeting.
recognises that these 'make an attractive		
proposition for plan-makers' yet, crucially,		Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subject
notes how 'their scale, complexity and (in		of its sustainability, deliverability and viability credentials in the same manner as all o
some cases) up-front infrastructure costs		has been a substantial change in circumstances to demonstrate the site can be delive
means they are not always easy to kick-		LDP period, as indicated within the housing trajectory. The Council has now purch
start'. Unfortunately, this has been the case		over Phase 1 (Salt Lake), coastal defence works are progressing on site and are d
for current allocations such as the		end of 2022. Partnership options are currently being explored in order to bring forwar
Porthcawl Waterfront which, as recognised		has commenced in relation to procurement mechanisms and a formal procuremer
by the Local Development Plan Preferred		commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted by
Strategy Consultation Report, has		owner and a significant majority of the site is not reliant on coastal defence works
experienced 'inherent difficulties with the		owners agreement is in place, a disposal strategy is being finalised and the site is
delivery of the Waterfront Regeneration		market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no re
Area'. The site is currently a strategic		be unable to progress and come forward together, as further evidenced by the extens
allocation in the adopted LDP and was a		evidence. In summary therefore, the proposal to alter Porthcawl Waterfront to a
strategic allocation in the Unitary		Allocation is both unsubstantiated and not supported.
Development Plan (UDP) which was		
adopted in 2005. Despite the consistent		
prioritisation of this site by BCBC, at the		
time of the Local Development Plan		
Preferred Strategy Consultation Report		
(2020), the site had only delivered 13 units		
actively contributing to the LPA's inability to		
maintain a healthy housing-land supply.		
Since the publication of this document,		
BCBC have attempted to overcome the		
historic constraints associated with the		
Porthcawl Waterfront site, such as		
ownership. While, in the interest of		
deliverability, we wish this were the case,		
the historic undeliverability of the site and its		
inability to deliver much-needed residential		
development must be taken into account.		
Paragraph 4.2.18 of PPW11 notes that		
'housing led regeneration sites' such as the		
Porthcawl Waterfront site, 'can sometimes		
be difficult to deliver, making timescales for		
development hard to specify.' In light of this,		
PPW 11 suggests that 'where deliverability		
is considering to be an issue, planning		
authorities should consider excluding such		
sites from their housing supply so that		
achieving their development plan housing		
requirement is not dependent on their		
delivery'. In this way, as the Porthcawl site		
has been unable to deliver for decades, and		
across different local development plans, it		

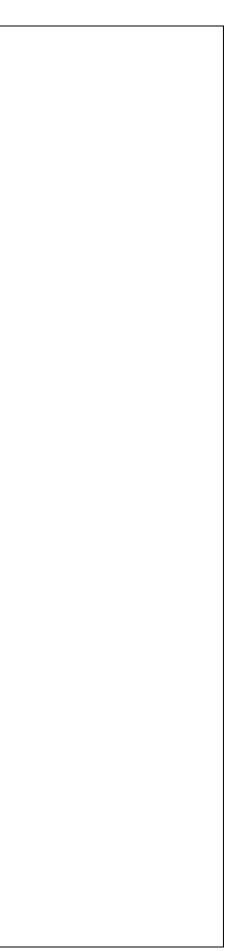
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	must be taken into account that a strategy		
	to deliver 1020 market units and 335		
	affordable units may likely fail or, at the very		
	least, not deliver in the appropriate time-		
	frame impacting negatively on the housing		
	supply and deliverability. In light of this, we		
	propose classifying the Porthcawl		
	Waterfront site as a Long-Term		
	Regeneration Sites in line with the		
	development opportunities in Maesteg &		
	The Llynfi Valley. Ultimately, as outlined by		
	the National Policy, the deliverability of		
	1355 of both market and affordable new		
	homes cannot depend on a site which has		
	historically undelivered for over 30 years		
	and should not directly make up the		
	immediate housing supply. By removing		
	Porthcawl Waterfront, and its 1355 units, as		
	a Strategic Site, in line with the guidance		
	provided by National Policy, it is evident that		
	an immediate requirement of units would		
	need to be provided. Whilst it is recognised		
	that this would not be substantial to the point		
	of requiring the inclusion of another		
	strategic site in the allocations, it is evident		
	that the allocation of small-medium sites to		
	support the remaining four strategic sites is		
	crucial to maintain an immediate housing		
	supply. This approach is in line with the		
	LHMA (2021) which notes the 'continuing		
	difficulties younger households face in		
	accessing home ownership' and advocates		
	for 'a more balanced mix of dwellings on		
	new build sites, to include smaller, more		
	affordable market properties' as opposed to		
	the larger style properties, which 'have		
	become commonplace locally'. In this way,		
	by including a range of different sized sites		
	in the allocation, a variety of tenures and		
	house styles could be met supporting the		
	aspirations of National Policy and the		
	recommendations of the LHMA (2021).		
120	Land East of Pyle (SP2(5))	Support for Land	The representor's comments are noted, although the proposed changes to PLA 5 a
9	Considerable, and detailed submission	East of Pyle	is considered appropriate in its current form and is designed to ensure more certain
3	have been made to-date in conjunction with	(SP2(2)), with	the Replacement LDP period.
	discussions with the Local Authority, and	proposed wording	
		modifications to	
	other statutory bodies such as National Rail		
	and DCWW to promote and confirm the	PLA5.	
	unequivocal deliverability of this site as set		

# 5 are not supported. The Policy ainty for all stakeholders during

out in the proposed trajectory of the Deposit LDP.	
The site has also been subject to an extensive and independent viability assessment which wholeheartedly confirms the site is deliverable, taking into account likely 'opening up costs', planning obligations likely to be levied, other infrastructure and general build costs taking into account current circumstances.	
To support all of this, and as agreed with the Local Authority, despite the comprehensive submission of material and illustrative material provided to-date, the site promoter is preparing, through the design team, an appropriate supporting formal layout to support the examination process and pre- application process to a) Confirm SUDS / SAB requirements are accommodated; and b) confirm placemaking requirements of PPW11 and Future Wales Plan; and c) confirm the above matters don't impact the proposed quantum as part of the allocation – thus not undermining the allocation;	
In terms of timings and trajectories, this is fully supported, and intensions stand to engage formally with the local Authority through formal pre-application dialogue in earnest to support the delivery of this site, ensure it meets placemaking, Green Infrastructure and Suds requirements, all of which can form part of the LDP Examination process in conjunction with the pre- application process.	
In summary, these representations wish to fully support to the Deposit Plan as a whole, but raise concern primarily in relation to the exact policy wording affiliated with Land East of Pyle (SP2(5)) which is expanded in greater detail in the following sections.	
Policy Wording of Land East of Pyle (SP2(5))	



The currently proposed wording of strategic policy Land East of Pyle (SP2(5)) is worded below in italics. However, and whilst the strategic site is not yet subject to formal preapplication dialogue or application with the Local Authority, it is expected to be very soon (in order to support deliverability, and engage early with the Local Authority to ensure the comprehensive dialogue takes place with all stakeholders). As a result, there is no doubt likely to be areas which require flexibility to be catered for.

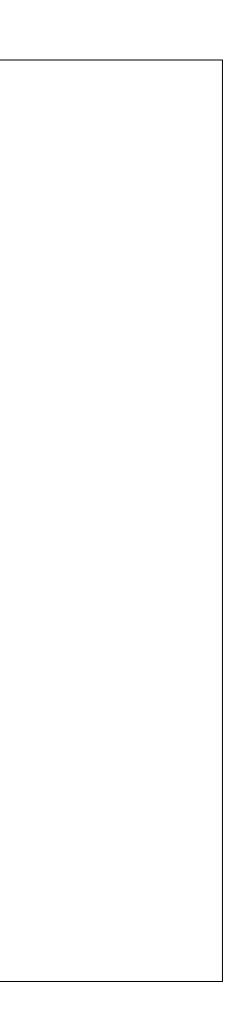
As a result, it is considered that policy wording needs to adopt a flexible approach which will still require the same output and principles to be met in meeting the policy requirements.

For ease, 'tracked changes' comments are provided in red text to outline where appropriate wording to policy text should be amended to improve flexibility to the policy wording. there is further text, in green, whereby our (GJP) considerations are added owing to a suggested change. It's considered these amendments will not undermine or materially affect the policy requirements, rather, allow a degree of interpretation by the applicant and decisionmaker (The Local Authority).

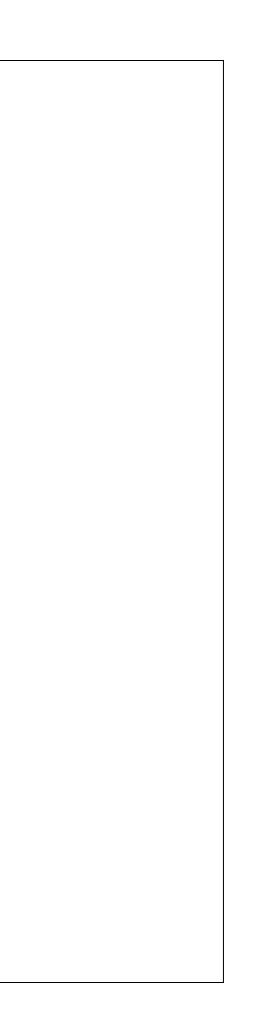
# Masterplan Development Principles

This development must should accord with the following principles, which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. A masterplan must should be prepared and agreed with the Council prior to the sites development to demonstrate how these principles will be delivered in an appropriately phased manner:

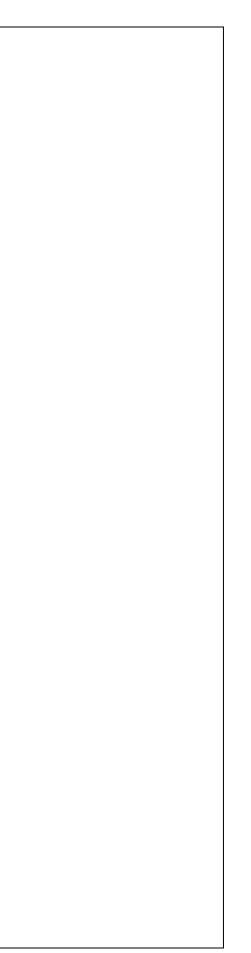
a) Create a well-connected sustainable urban extension to Pyle, North Cornelly and Kenfig Hill, comprising a number of character areas that integrate positively



	with the existing Town Centres, existing		
	housing clusters, community facilities,		
	Active Travel networks and public		
	transport facilities;		
	b) Create a multi-functional green		
	infrastructure network within the site that		
	facilitates active travel, taking account of		
	the need to create healthy communities.		
	There must be with a particular emphasis		
	on: retaining existing trees and		
	hedgerows within the public realm,		
	incorporating appropriate landscaping,		
	protecting biodiversity, facilitating habitat		
	creation and supporting a range of		
	opportunities for formal and informal play		
	in addition to community-led food		
	growing;		
	c) Ensure the design and layout of the site		
	has regard to the landscape in which it sits,		
	considering the interface between the site		
	and the broader grouped settlement of		
	Pyle, Kenfig Hill and North Cornelly. Visual		
	impacts must be minimised through the		
	inclusion of mitigation measures that		
	provide links with the existing landscape		
	and access features to safeguard		
	landscape character whilst creating a		
	sense of place. The development must not		
	be to the detriment of the Special		
	Landscape Area and any development		
	proposal must incorporate measures to		
	reduce adverse effects and/or visual		
	intrusion on the wider landscape; It is		
	considered that the text in 'strikeout' is not		
	required for a policy, rather, it is better		
	suited (and is a 'given)' to form and will		
	need to form, part of the development		
	control process by the decision maker		
	(The Local Authority). Is it therefore considered this text to be superfluous to		
	the policy requirements as it will have to		
	be taken into account through a future		
	pre-application enquiry and planning		
	application.		
	d) Pursue transit-orientated development		
	that prioritises walking, cycling and public		
	transport use, whilst reducing private		
L	i antipert ace, innet reducing private		



motor       webside       dependency       It       is         considered superfluctuots to policy wording,       as       'reducing private motor vehicle       dependency' is the modal shift arising         from improved pedestrian connections,       active travel provisions, cycle and public       transport         transport offer. Well designed, safe       walking and cycling routes must be       incorporated throughout the site to foster         community orientated, healthy, walkable       needbourhoods. Connections must also       be         be made to the wider active travel and       public transport network to ensure safe       connectivity with Pyle and Kenfig Hill         District Centres, North Cornelly Local       centre, Pyle Railway Station, Village       Farm Industrial Estate and Cynflig         Comprehensive School;       e)       orientate buildings to face open       spaces and streets to enhance         cohesiveness, foster a strong sense of place and ensure community safety; and       place transport networks       place         1       Provide a mix of higher densities at key points in the layout and lower densities on the rural/sensitive edges.       Development must provide the following:         1       Orica 2.000 homes, incorporating an appropriate mix of dwelling sizes and types to meet local housing needs, including 15% affordable housing to be integrated throughout the development in sustatinable clusters of no more than unu units as per the Councit's requirements;		
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primary schools with co-located nursery		
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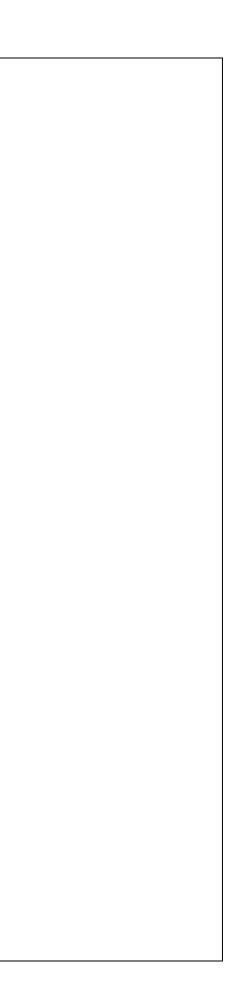


nursery, primary, secondary and post-16 education provision as required by the Local Education Authority. The financial contribution (including timing and phasing thereof) must be secured through Section 106 Planning Obligations in accordance with the Education Facilities and Residential Development SPG. Both schools must be accessible to new and existing residents by all travel modes, enabled by the development; considered superfluous to policy text and will be prescribed in a Section 106 Agreement.

3) Green Infrastructure and Outdoor Recreation Facilities to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance;

4) 1.5 hectares of land for commercial uses, including considered superfluous to policy text, and land coverage will be derived from appropriate quantum required to not compete with Pyle District Centre and to a design to accord with BBE standards which can, and will be prescribed in a Section 106 Agreement ....a new local 'hub' with a concentration of appropriate mixed uses and local services. The 'hub' should have active frontages around a pivotal, focal point of the development where it is easily accessible to new and existing residents through Active Travel, thereby limiting the need for private vehicular trips;

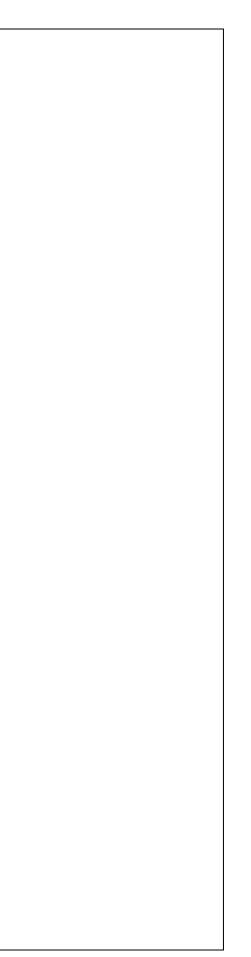
5) Highway improvements to ensure the principal points of vehicular access are off the A48 and A4229. Appropriate adjustments must also be made to the roundabout between the A48 and A4229 to improve traffic flow and highway safety;
6) New shared footways, cycleways and improved crossing facilities along the A48 and A4229 and highway improvement to enhance pedestrian safety in the vicinity of the site;



7) A new pedestrian and cycle bridge over theexisting railway line and along A48/Pyle Road to provide safe pedestrian and cycle linkages between the site and Pyle. The bridge must be constructed to Council adoptable standards prior to the occupation of any homes on the development; considered superfluous to policy text, and land coverage will be derived from pupil place yield and to a design to accord with BBE standards which can, and will be prescribed in a Section 106 Agreement 8) Off-site highway improvements with regard to the requirements arising from the Transport Assessment and as identified in the Transport Measures Priority Schedule; 9) On-site and off-site measures to provide good quality, attractive, legible, safe and accessible pedestrian and cycle linkages in accordance with Active Travel design. Improved linkages must be provided along the A48 and A4229, with Cynffig Comprehensive School, Village Farm Industrial Estate Pyle and Kenfig Hill District Centres, existing bus routes and Pyle Railway Station (including safe pedestrian linkages across the railway bridge). Connections must therefore be made to existing active travel routes and new routes should be provided to accord with the proposed routes within the Council's Active Travel Network Maps: INM-PY-12, INM-PY-13, INM-PY-16, INM-PY-18 and INM-PY- 19: 10) Suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland), and SINCs: 11) Ecological management plans including proposals for mitigation, enhancement and maintenance for retained habitats and protected species (including for bats and dormouse) and appropriate compensatory and replacement habitat; Considered superfluous given this is effectively covered by criterion 9 above. Such Management Plans would need to feature in any planning application (conditionally)



	and indefinitely to support future NRW		
	Licence applications. This is considered to be appropriately covered by point 10.		
	12) On and off-site measures including		
	any appropriate upgrades to the clean		
	water supply or public sewerage networks;		
	13) Follow the sequential approach to		
	identify low carbon heating technologies in		
	accordance with ENT10; and		
	14) Ensure that the development does		
	not prejudice the proposed future		
	relocation of Pyle Railway Station plus		
	accompanying park and ride facility.		
	Amplification Text The site is located to the east of Pyle,		
	bounded by the (Swansea to London		
	Mainline) railway to the north, common		
	land to the East, the M4 motorway to the		
	South and the A4229 to the west. Village		
	Farm Industrial Estate is also located		
	immediately to the north, beyond the		
	railway line. The site comprises		
	approximately 100 hectares in total and is divided into 2 parcels by the alignment of		
	the A48; Parcel A (to the south of the A48)		
	consists of 60 ha and Parcel B (to the		
	north of the A48), 40ha. The site rises		
	gradually upwards away from the A48		
	roundabout and is currently used as		
	farmland.		
	The wider area comprises a mix of land uses with residential development and an		
	employment allocation to the west of the		
	site (Ty Draw Farm, North Cornelly). Pyle		
	Railway station is located in close		
	proximity to the northwest of the site. Pyle		
	and Kenfig Hill District Centres are		
	approximately 1km and 1.5km to the north		
	of the site, respectively. Bridgend Town		
	Centre is located approximately 7.4km away to the east of the site, which can be		
	accessed by both public transport and the		
	A48 leading onto the A473.		
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	The site is allocated for a comprehensive		
	residential-led mixed use scheme,		
	including a local commercial centre,		
L	appropriate supporting infrastructure and		



the provision of two new primary schools. The latter contribution will necessitate 5.7ha of land being set aside for construction of the new schools, inclusive of a land buffer to enable future expansion. The proposal would seek to deliver new pedestrian and active travel links from the site to Pyle/Kenfig Hill to improve connectivity. Particular emphasis will be placed on improving the pedestrian links to Pyle Railway Station and facilitating safe pedestrian and cycle passage between the site and Pyle through delivery of a new bridge over the railway line.

There is an existing access via the roundabout off the A4229 and the A48 to the existing dwellings at Ty Draw Farm. New access points will be achieved on the northern and western boundaries of the site, to the A48 and A4229, respectively.

Improvements to proposed active travel routes will capitalise on the site's close proximity to Pyle and Kenfig Hill District Centres, rendering walking, cycling and public transport viable alternatives to private vehicle use. This will enhance the site's sustainable location on the edge of this Main Settlement in order to provide safe active travel linkages to public transport (including Pyle Railway Station and bus routes), Village Farm Industrial Estate, Cynffig Comprehensive School and other community services.

A feasibility study is currently being undertaken to examine the potential for Pyle Railway Station to be redeveloped as a transport hub. This would entail relocating the existing railway station to the north of the site and incorporating extended park and ride facilities to improve links to Porthcawl and Village Farm Industrial Estate. The development will therefore not prejudice any future station relocation plans, which would serve to further enhance the site's sustainable location and maximise active travel opportunities Visually the site is open and exposed to views from the north, west and locally to



the cast as well as views from the M4 to the south. The most sensitive parts are the three high points, upper slopes and associated minor ridges, and the steep slope to the west on the southern edge. The least sensitive area lies to the north and west on the lower slopes/flat areas, which lends itself to be the most appropriate location for the bulk of higher density development. The southern part of Parcel B is within a Special Landscape Area and the development will need to be planned sensitively to take account of this designation.

The site itself is not subject to any ecological designations, although further wildlife and habitat surveys will need to be carried out to inform the site's potential development.

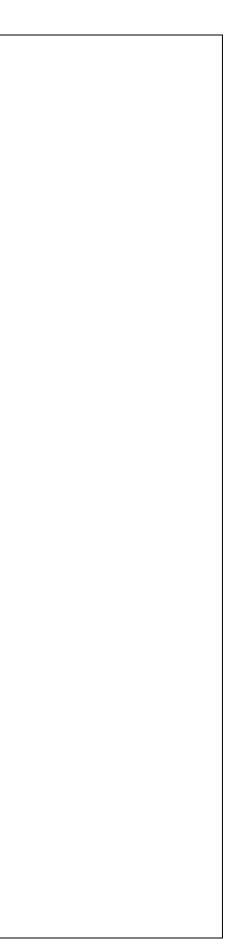
Additionally, there are two SSSI's located in close proximity to the boundary of the site; the Penycastell SSSI is located to the north east and the Stormy Down SSSI is located to the south east of the site. Both are physically separated from the site by the route of the trainline and the M4 respectively. Given the need to maintain a landscape buffer between major transport routes and any proposed development, neither are considered to be a constraint to development.

Archaeology Wales have undertaken a Desktop study which highlights standing and buried remains o f potential archaeological interest. A WWII pillbox exists at the north west area of the site and there is believed to be an area of earthworks related to a 19th century (or possibly older) farmstead at the north east of the site. A 19th century tramline is also located along the northern portion of the site. The development will ensure that these remains are preserved or adequately investigated and recorded if they are disturbed or revealed as a direct result of development activities.

The site neighbours Stormy Castle, a medieval settlement, which could extend into the site. Further work will need to be conducted to fully investigate any



potential impacts and a geophysical	
survey of the site will need to be carried	
out to supplement the planning	
application.	
These sections of the amplification text are	
considered to be too onerous for the policy,	
and are directly relatable to development	
control assessment by the decision maker.	
Such application requirements wil I form	
part of a pre-application response from the	
Local Authority, and given the potential	
shift in National policy in the future (as	
iterations of PPW have evolved over time	
e.g. from Edition 8 to Edition 11) such	
provisions may be superseded. These	
aspects can be, and are appropriately	
covered by the decision-maker through the	
pre-application and planning application	
process.	
A future planning application must be	
accompanied by an 'Energy Masterplan'	
that demonstrates that the most	
sustainable heating and cooling systems	
have been selected, following the	
sequential approach to identify low carbon	
heating technologies in accordance with	
ENT10.	
To re-cap, the proposed changes in red	
text are considered appropriate, and do	
not materially affect the overall	
requirements of the strategic policy.	
Summary	
In light of the above, and the enclosed, we	
wish to emphasise the support for the	
allocation as a whole, albeit do consider	
some of the policy wording can, and	
should be amended to allow flexibility in	
the policy wording which will not	
undermine or materially impact upon the	
overall policy objectives. Flexibility should	
also be allowed at this time, as the site will	
be under-going pre-application dialogue	
with the Local Authority where flexibility in	
policy wording should be catered for.	
The site promoters have provided a	
significant volume of supporting technical	
information to confirm the site is	
inherently deliverable, and is committed	
to preparing an embellished testing layout	



	to support pre-application dialogue and the Examination process in due course. The site promoters fully support the overall allocation, yet suggest appropriate flexibility be built into the policy wording as suggested in these written representations. I hope these representations are welcomed, and we look forward to continuing to discuss these comments at the next appropriate stage, in accordance with the LDP timetable.		
222	Land East of Pyle As previously outlined, Bellway strongly objects to the inclusion of Land East of Pyle being allocated and recommend it is deallocated from the final version of the RLDP. Despite Pyle being identified as a main settlement together with Kenfig Hill and North Cornelly, and being considered a SGA within the DCD spatial and growth strategies, Bellway are unconvinced that the site is viable or deliverable; both of which are essential considerations relative to the housing delivery for the next plan period. The allocation of Land East of Pyle has major implications on the robustness of the housing trajectory. No clear evidence has been provided to the Council to demonstrate that all landowners are in agreement for the site to be developed, there are no known developers on board to deliver the substantial level of housing proposed to be allocated and there are major technical constraints that render the proposal unviable, namely the required infrastructure to support an allocation of this proposed size.	De-allocate Land East of Pyle due to lack of deliverability information.	As documented in the Candidate Site Assessment, the Land East of Pyle s demonstrated delivery in accordance with the requirements set out in the Developme plethora of evidence has been provided to the Council to support its delivery investigations and appraisals, masterplans, a viability assessment, a transp consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora of requirements, infrastructure provision and placemaking principles necessary to communities. Contrary to the representor's statement, all landowners are committed a development site that can be delivered as a comprehensive development. The rel prepared initially through close dialogue with the respective site-promoters, followe and involvement with a range of stakeholders at a Stakeholder Group Meeting. Housing Trajectory Background Paper, there were no outstanding matters of disag figures or the timing and phasing of sites in the plan period (including those sites with new housing allocations) following conclusion of the Stakeholder Group Meeting. concerns are both unsubstantiated and not supported.
	Bellway consider the allocation of 2,000 home on land east of Pyle as part of the RLDP to be inappropriate. It is considered that level of development is a strategic issue which should be considered through a Strategic Development Plan (SDP). Whilst there is no defined figure within PPW, Edition 11 on what constitutes a strategic level of housing, the DPM, Edition 3 sets out the content of an SDP on page 215 in terms	De-allocate Land East of Pyle from the Replacement LDP and re- consider through the forthcoming SDP	No action is considered necessary. Work on the SDP has not yet commenced and a been defined through this process. The Bridgend Replacement LDP is being p forthcoming SDP and is bound by a Delivery Agreement. A range of plan preparation in the Review Report before work on the Replacement LDP began. The Review Re Council undertakes a full review of the existing LDP on an individual Local Planning wherever possible working collaboratively with other LPAs to produce a joint evident to prepare a SDP. Whilst the Council remains committed to the SDP process, the demonstrated that Land East of Pyle is both viable and deliverable during the R accordance with the Growth and Spatial Strategy. The representor's concerns implications are unsubstantiated, especially considering Bridgend County Boroug

site promoter has robustly ment Plans Manual. A detailed ery, including numerous site sport assessment and due is provided a high degree of a of associated development to deliver high-quality new ed to working towards ensuring related housing trajectory was wed by effective collaboration g. As documented within the agreement on the completion with planning permission and g. As such, the representor's

ad site thresholds have not yet prepared in advance of the ation options were considered Report recommended that the ng Authority (LPA) area basis, ence base and with the region the site promoter has clearly Replacement LDP period, in ns regarding cross boundary ugh Council has remained in

of identifying spatial areas to accommodate growth above a set threshold. It gives the example threshold of 1,000 dwellings. Paragraph 10.7 states SDPs should set thresholds below which places and or issues should not be included in the plan. Whilst there is no SDP in place, the DPM provides an indication that a threshold of 1,000 dwellings is considered a strategic issue by Welsh Government, a point which Bellway agrees. The allocation of 2,000 dwellings is therefore not a matter for the RLDP to consider but to be addressed through a SDP as a development of that scale in a very accessible location is likely to have cross boundary implications. This further justifies the deallocation of the site from the final version of the RLDP in		dialogue with Neath Port Talbot County Borough Council throughout plan preparation Borough Council has submitted formal representations on the Bridgend Deposit Plan proposed allocation and support the Deposit Plan. In addition, the number of dwellings Land East of Pyle is expected to deliver durin similar in scale to the other proposed Strategic Sites. Therefore, it is not considered the site and delay progress on site progression until a future SDP is adopted.
Bellways view. Whilst it is noted, the intention is to split the housing allocation identified in Policy PLA5 (Land East of Pyle, Pyle, Kenfig Hill and North Cornelly SGA) across the RLDP plan period to 2033 and then across the following plan period, it is considered that if that level of housing is required at Pyle and North Cornelly that the land at Heol Fach be allocated in the final version of the RLDP to enable much needed housing to be delivered in the forthcoming plan period.	Proposal to allocate Land at Heol Fach, North Cornelly to enable shorter-term housing delivery	The representor has submitted a comprehensive viability assessment for Land at I Therefore, demonstrating that the site is viable and deliverable. As stated in the C (2022), "The candidate site is located on the periphery on North Cornelly which is Growth Area (as defined by SP1). The site is well serviced by the Active Travel net and promote transit-oriented development. The site is considered to be free of a However, whilst the Candidate Site Assessment concludes by stating that site is con LDP strategy and has passed all tests of assessment, members of Cabinet have or required for allocation as they deem a 10% flexibility allowance is sufficient.
Furthermore, Policy PLA5 identifies the provision of 15% affordable housing as part of the land use and development requirements set out within the draft policy. However, whilst the 15% affordable housing requirement forms part of the draft policy it is not clear whether the full 300 affordable units will be delivered in the RLDP period or split across the following plan period. Given the identified need for 5,134 affordable units from 2018-2033 within the Local Housing Market Assessment Bellway consider that all 300 units should be provided within the RLDP period to assist meet the needs identified in Pyle, Kenfig Hill and North Cornelly. If this is not possible, it needs to be made clear what level of affordable housing provision would be delivered in the	Query on Land East of Pyle's affordable housing contribution	The rationale for the area-based and site-specific policies is clearly set out with Background Paper. Within any broad housing market area, there will inevitably be viability, the nuances of which can never be fully captured in an area-wide stu Development Plans Manual, "much more insight can be gained which can result in targets, as opposed to the broader area identified in the high level appraisal. The rather the site specific being a refinement of the high level appraisal" (WG, 2020, part to the area-wide affordable housing requirements within COM3, there are also site- requirements. The former are based on the Plan-Wide Viability Assessment, the latter viability testing, which has involved analysis of more specific costs, constraints and si faceted approach is paramount to ensure Council's aspirations for delivering high-qu both realistic and deliverable. This evidence has indicated that higher levels of a supported on certain sites as detailed within COM3. As detailed within the Affordable Housing Background Paper, the scale of affordable distribution thereof have been key considerations when determining the overall leve the Replacement LDP (see also to the Strategic Growth Options and Spatial Stra Papers, respectively). The Plan's contribution to affordable housing provision has al through robust viability work (plan-wide and site-specific) to ensure formulation of

on. Neath Port Talbot County Plan, cite no objections to this

ring the Replacement LDP is red appropriate to de-allocate

t Heol Fach, North Cornelly. Candidate Site Assessment is identified as a Sustainable network which will help foster f any significant constraints. considered to accord with the e decided that this site is not

within the Affordable Housing be pockets of higher or lower study. As outlined within the in refined affordable housing he two are not contradictory, para 5.89). Hence, in addition te-specific affordable housing tter are based on site-specific d site requirements. This dualquality new communities are of affordable housing can be

able housing need and spatial vel and location of housing in Strategy Options Background also been carefully analysed of viable affordable housing

RLDP and any future provision in a later plan period to fully understand whether the affordable housing needs identified in the evidence base to the DCD are capable of being met.		policy thresholds and proportions. It also has to be recognised that the need identified the scale of the affordability gap in the market and the LDP itself is not the only af mechanism to help address it. The LHMA itself clarifies that this headline need figure a delivery target or even the solution to the affordability issues within the County Bor the level of housing need within the County Borough, which the Council will seek to ac market interventions as far as practically deliverable. These complementary sources of are not limited to, Social Housing Grant and other capital/revenue grant funded sch Landlord self-funded schemes, reconfiguration of existing stock, private sector leasin homelessness duties into the private rented sector and re-utilisation of empty properti Despite the representor's claims (in relation to Land East of Pyle) that "it is not c affordable units will be delivered in the RLDP period or split across the following plan p Affordable Housing Background Paper clearly states that the 300 affordable units a within the Replacement LDP period. These units have been incorporated into the Rep housing target. The delivery phasing would be secured through a future s106 agreem
<b>Candidate Site Assessment</b> The Candidate Site Assessment notes that the site (Ref.328.C1) is located on the periphery of the settlement for North Cornelly, a SGA. The Sustainability Appraisal identifies 'SSSI (Site of Special Scientific Interest)' and 'flood risk' as a constraint that would prevent development from coming forward. The northern section of the site is located within Flood Zone C2. TAN15 states that only less vulnerable development should be considered subject to application of justification test for sites within Flood Zone C2. However, the identified constraints are located on the periphery of the site and would require further assessment as part of Stage 2, to determine whether the constraints can be satisfactorily overcome. However, Appendix 7 of the Assessment goes on to state the 'site has the potential to provide new primary schools and 2,000 homes in Pyle, of which possesses a wide range of services and facilities in addition to sustainable transport links. This site will make an important contribution to meeting the housing need of the County Borough. A supporting masterplan and planning statement identifies and mitigates potential constraints relating to connectivity to Pyle via a proposed foot bridge in addition to taking into account potential flood risk'. Whilst there is some dispute regarding the true constraint free nature of the site,	De-allocate Land East of Pyle due to deliverability concerns	Contrary to the representor's statement, all landowners are committed to work development site that can be delivered as a comprehensive development. In terms of the potential flood risk, the site promoter has provided illustrative masterpl no built form will be provided in the northern section of the site and that this will be ap open space. Development will be located away from this area of land and confined s Zone A (Areas at little or no risk of flooding). Areas at high risk of flooding are to be or of low vulnerability to flooding, such as Public Open Space or SuDS. With respect to adjacent or nearby designations, the site promoter has submitted confirms there is an adjacent partial SSSI/SAC (Cefn Cribwr Grasslands), designated meadows and marsh fritillary butterfly presence. This designation is separated from the line to the north of the north-east corner. No devil's bit scabious or purple moor-grass the field visit, with the land either grazed by sheep or cattle, or cut for hay/silage. anticipated on this designated site, or any others within the local area (including Stot the immediate south-east of the site). As stated in the Candidate Site Assessme masterplan and planning statement identifies and mitigates potential constraints relat via a proposed foot bridge in addition to taking into account potential flood risk".

ified in the LHMA represents affordable housing delivery ure should not be considered Borough. It instead indicates address through a range of s of supply include, although schemes, Registered Social asing schemes, discharge of erties.

at clear whether the full 300 an period", Table 3 within the s are earmarked for delivery Replacement LDP affordable ement.

orking towards ensuring a

erplans, which document that appropriately used for public d solely to areas within DAM e confined to uses which are

ed an ecology report, which ited for its purple moor-grass the site by a road and railway ass was found on-site during ge. No negative impacts are Stormy Down SSSI, found to sment Report, "a supporting elating to connectivity to Pyle Bellway note that more fundamentally that for such a significant proposed allocation, there is no developer involvement. The Council state "All landowners are committed to working towards ensuring a development site that can be delivered as a comprehensive development." However, the site has been promoted via some, not all, of the landowners and as far as we are aware and there is currently no confirmation that a developer is engaged to take the site forward. Given the nature and the size of the proposal Bellway would have considered that this was a pre requisite to progressing to an allocation.

## DCD Sustainability Appraisal

The Full Sustainability Appraisal (2021) of the DCD considers that the likely significant beneficial effects of the proposal will outweigh the likely significant adverse effects on cultural heritage, specifically impacts on important archaeological sites. However, it is understood from the HER notes that the site is subject to Medieval Ridge & Furrow as well as a site of a cross base and a World War 2 Machine gun post. Furthermore, the site forms part of a wider area enclosed in the Medieval period as a monastic grange. The Eastern area is also part of an extensive deserted village represented by the Scheduled Stormy Motte, hut platforms and other earthwork features. Whilst the promoter has confirmed geophysical survey will be undertaken to inform mitigation the likely impact on archaeological remains unknown and this will have consequences to the developable areas of the site and deliverability in terms of the proposals viability.

**De-allocate Land** 

East of Pvle due

to unknown

impact on

archaeological

remains

Query on Land

East of Pyle's

effect on SA

Objective 12a

(Sustainable

Placemaking)

It is questioned why the SA does not consider a proposal of 2,000 homes on land east of Pyle to not have a likely significant adverse effect on Sustainable Placemaking SA Objective SA12a. In fact, the SA appears to be mute on this point and has not identified whether the proposal would have a likely significant beneficial or likely A geo-environmental and geotechnical desk study of the site has been conducted to assess the nature and extent of possible contamination (and its implications for site development) along with any geotechnical constraints to development. The study recommended how best to prepare the site for development, with further work including a comprehensive intrusive site investigation and a geophysical investigation to be undertaken. In accordance with advice from Glamorgan Gwent Archaeological Trust, a geophysical survey of the site will supplement any formal planning application. The timescales for such matters have been factored into the development trajectory, which was prepared initially through close dialogue with the respective site-promoter, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting.

As documented within the SA Report, the majority of existing, viable, brownfield regeneration sites have recently been delivered under the existing LDP or are committed and expected to come forward within the next few years. However, remaining viable opportunities on previously developed land are exhausted, therefore some greenfield sites are required in a sustainable manner through complementary allocations on the edge of existing settlements. Identification of Land East of Pyle and other appropriate Sustainable Urban Extensions has been undertaken in accordance with the Site Search Sequence and other requirements set out in Planning Policy Wales, as documented in supporting evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy Options Background Paper, Housing Trajectory Background Paper and Minimising the Loss of BMV

significant adverse effect on SA12a. Whilst it is accepted that the need for development on Greenfield land is reflected through the RLDP evidence base and Regeneration and Sustainable Urban Growth Led Strategy within the RDLP, it is not clear to Bellway how a proposal of the proposed scale and nature would minimise Greenfield land take. In this context, it is considered more appropriate for other reasonable alternatives such as land at Heol Fach which has less of an impact in terms of Greenfield land take and is adjacent to the existing settlement boundary of North Cornelly which forms part of an identified SGA to be more preferable and included as an allocation in the final RLDP. Especially when it is developer led and can deliver much needed market and affordable housing in the short term.

In addition to the significant adverse effect on important archaeological sites, it is noted that Table D.1B Detailed SA of Candidate Housing Sites also scores the site negatively against the following criteria:

- Proximity to health facilities
- Proximity to Primary Education Infrastructure
- Proximity to Congestion Pinch Points
- Water Supply Score
- Sewerage Score
- Proximity to European Sites (recreational pressure)
- Proximity to European Sites (SAC)
- Proximity to SSSI
- Proximity to Ancient Woodland
- Proximity to RIGS
- Presence of Valued Habitats and Species
- Proximity to Flood Risk Zones
- Proximity to Main Rivers and Lakes
- Previously Developed Land or Greenfield Land
- Proximity to Scheduled Monuments
- Proximity to Listed Buildings
- Proximity to SLA or Heritage Coast
- Visual Amenity Impact

Concerns about Land East of Pyle's viability and deliverability in relation to SA criteria

Agricultural Land Background Paper. The rationale for the proposed allocations within the Deposit Plan is clearly outlined in the Candidate Site Assessment. Without exception, all proposed sites are supported by a large body of technical and viability evidence to demonstrate their deliverability.

In accordance with Stages 5 - 8 of the site assessment methodology outlined in Section 2 of the SA, the assessment carried out at Pre-Deposit stage was updated to account for new information and augmented with additional criteria. SA Table D.1b sets out the detailed list of all findings resulting from the Deposit Stage of the assessment in relation to Candidate Housing Sites. For the avoidance of doubt, the identification of a candidate site as constituting a reasonable alternative option indicates that the site does not have 'showstopper' constraints and is therefore available for consideration as a potential site allocation. Full SA site assessment findings, including all identified likely significant effects (beneficial or adverse) and proposed mitigation, have been taken account of by the Council in selecting an appropriate suite of proposed site allocations and infrastructure proposals to meet identified needs. Informed by the SA Report, the Candidate Site Assessment confirms and provides reasoned justification for the outcome of the site selection process in respect of each candidate site.

For Land East of Pyle, the Candidate Site Assessment sates, "The candidate site is located on the periphery of Pyle which is identified as a Sustainable Growth Area (as defined by SP1). The site has the potential to provide new primary schools and 2000 homes in Pyle, of which possesses a wide range of services and facilities in addition to sustainable transport links. This site will make an important contribution to meeting the housing need of the County Borough. A supporting masterplan and planning statement identifies and mitigates potential constraints relating to connectivity to Pyle via a proposed foot bridge in addition to taking into account potential flood risk. Therefore, the site is considered to be free of any significant constraints. The site is therefore allocated for development in the Deposit Plan".

As documented in the Candidate Site Assessment, the Land East of Pyle site promoter has robustly demonstrated delivery in accordance with the requirements set out in the Development Plans Manual. A detailed plethora of evidence has been provided to the Council to support its delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. The related housing trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder

It is therefore evident that substantial further technical work will be required to bring forward development of the site with knock on consequences in terms of viability and deliverability of the scheme.		Group Meeting. As documented within the Housing Trajectory Background Paper, to matters of disagreement on the completion figures or the timing and phasing of sites in those sites with planning permission and new housing allocations) following conclusion Meeting.
Infrastructure		
The suitability of the SGA to accommodate new residential development is largely predicated on the presence of Pyle railway station, which offers a genuine sustainable transport option for residents, along with employment and retail facilities. However, the strategic site at land east of Pyle is very physically detached from the grouped settlement and is not well placed to take advantage of these sustainability credentials. The A4229 (and its associated landscape buffers), the large roundabout at the northern end of the A4229 and the railway line all represent significant physical barriers between the site and the rest of the settlement. Bellway remain unconvinced that there is sufficient infrastructure currently in place to accommodate the level of growth proposed on land east of Pyle.	De-allocate Land East of Pyle as it is 'physically detached' from the grouped settlement	Land East of Pyle is appropriately located to connect to a range active travel op community orientated, healthy, walkable neighbourhoods. Pyle Railway station is low the north west of the site, and, in addition, Pyle and Kenfig Hill District Centres are al 1.5km to the north of the site, respectively. Proposed policy PLA5 sets outs a number of principles in order to create a well-connected sustainable urban extension to Pyle, Hill, comprising a number of character areas that integrate positively with the existin housing clusters, community facilities, Active Travel networks and public transport fac The proposed development requirements (within PLA5) include new shared footways crossing facilities along the A48 and A4229, along with highway improvements to end the vicinity of the site. Critically, a new pedestrian and cycle bridge would be require line and along A48/Pyle Road to provide safe pedestrian and cycle linkages between ensure improved linkages with Cynffig Comprehensive School, Village Farm Industr Hill District Centres, existing bus routes and Pyle Railway Station (including safe pede railway bridge). Connections would need to be made to existing active travel routes provided to accord with the proposed routes within the Council's Active Travel Networ requirements as set out within PLA5 will enable transit-orientated development that and public transport use, whilst reducing private motor vehicle dependency. As a framework is considered appropriate to address the representor's concerns regarding detached'.
The Settlement Assessment does demonstrate that Pyle amongst others does objectively demonstrate a high level of accessibility that could (underlining to emphasise) be capable of accommodate growth in an integrated and co-ordinated manner. However the Assessment goes onto to state realisation of this phenomenon would depend on more comprehensive assessment of transport capacity. A point which Bellway agree. Due to COVID restrictions it is noted that landowners, developers and promoters have been unable to undertake full transport assessments. As a consequence the full impact on highway network remains unknown and the cost of mitigation, another factor which would affect viability, remains unknown. Whilst it is acknowledged that highway impacts and mitigation are relative to each scheme, Bellway disagree that a	De-allocate Land East of Pyle as the full impact on the highway network and cost of mitigation remains unknown	Contrary to the representor's statement, a Transport Assessment has been prepare examine the highway and transportation issues associated with Land East of Pyle. following key transportation issues arising from the proposals: (i) the existing si infrastructure; (ii) analysis of personal injury traffic accident data (iii) the site's co transport policy; (iv) the development proposal; (v) development-generated v development impact on the surrounding highway network. The Assessment concluded in highway and transportation terms, why the site should not be allocated for develo LDP. The proposed site accesses will be taken via three separate junctions, one on A48. The site is also favourably positioned to contribute significantly towards Bridg strategy and help deliver local active travel improvements to Pyle, North Cornelly, Sou Bridgend in line with the Active Travel Wales 2013 Act. Capacity analysis has been u identify that of the seven junctions assessed, only two are forecast to experience que warrant mitigation as part of the development of the site. Following a preliminary accid also no evident clusters and therefore no obvious highway safety concerns within the site. An STA has also been undertaken to consider the impact of plan proposals and f process of delivering land allocations by means of modelling and quantifying the proposals. The STA demonstrates that the proposed level of development detaile accommodated within the BCBC Highway Network with suitable mitigation. Approp have been factored into Land Easy of Pyle's viability appraisal.

r, there were no outstanding s in the plan period (including sion of the Stakeholder Group

opportunities that will foster located in close proximity to also approximately 1km and er of masterplan development e, North Cornelly and Kenfig sting Town Centres, existing facilities.

ays, cycleways and improved enhance pedestrian safety in ired over the existing railway en the site and Pyle. This will strial Estate Pyle and Kenfig edestrian linkages across the es and new routes should be vork Maps. The development at prioritises walking, cycling s such, the proposed policy ling the site being 'physically

ared by the site promoter to le. The report discusses the site location and transport compliance with applicable vehicular traffic; and (vi) led that there are no reasons, elopment in the replacement on the A4229 and two on the dgend's integrated transport outh Cornelly, Porthcawl and n undertaken and the results queueing and delay that may cident investigation there are the vicinity of the application

d help guide and inform the ne transport impact of these ailed within the LDP can be ropriate mitigation measures

proposal of this size would not have likely significant highway impacts especially when compared to a 200 scheme such as that proposed on land at Heol Fach. It is considered without appropriate mitigation the development on Land East of Pyle would have likely significant effects which should be reflected in the Council's Sustainability Appraisal and is a reason for a Candidate Site not being taken through to adoption within the RLDP.		
Furthermore, the Infrastructure Delivery Plan 2021 sets out in Appendix 1 the required infrastructure to support strategic sites. Focussing purely on transport infrastructure identified to support the delivery of Land East of Pyle the majority of elements that are to be delivered are waiting to have costs established or to be provided as part of highways works. However, the new footbridge over the railway line has two options identified; 1) £1,239,549 or 2.) 2,847,560 which have been provided in October 2020.	De-allocate Land East of Pyle as the costs of the new footbridge could render the scheme unviable	Land East of Pyle is supported by a comprehensive and independently verified viab factored in appropriate costs for the new pedestrian and cycle bridge (and, inc infrastructure costs). This clearly demonstrates that the development is viably infrastructure. Therefore, the representor's concerns are unfounded and not support
It is also noted that other infrastructure projects include: i. Improvements to Pyle railway station; ii. Proposed extension to the park and ride facility from 25 bays by a minimum or 32 spaces, iii. A feasibility study to relocate the station. The estimated cost of the station relocation is identified to be £19.7m. Whilst land is being safeguarded for the relocated station it will be dependent upon grant funding. These are significant costs which will have a bearing on the viability and deliverability of the allocation.	De-allocate Land East of Pyle as the costs of the proposed railway station re-location could render the scheme unviable and there is insufficient rail infrastructure to support the allocation	Whilst any future station relocation plans would only serve to further enhance the site maximise active travel opportunities, the proposed allocation is not dependent on the allocation would also not be required to fund any associated costs to render it action to the representor's assumption, therefore, Land East of Pyle has not been to the potential re-location of Pyle Railway Station. It is factually inaccurate to state which will have a bearing on the viability and deliverability of the allocation". Any future of this site would be progressed independently of the potential station re-location. Policy PLA5, any proposal must "ensure that the development does not prejudice the of Pyle Railway Station plus accompanying park and ride facility". The rationale for clearly set out in the Candidate Site Assessment Report and conforms with the Settl Strategy and LHMA.
The Estimated Additional Commuter Trips and Rail Infrastructure background paper provides an analysis of data collected by Transport for Wales (TfW) in October 2020 to assist the RLDP in informing what demand can be expected on rail infrastructure as a result of the implementation of strategic development. Given the ongoing COVID lockdowns that have been in place, Bellway question the reliability of the data collected and its outcomes as it does not necessarily reflect		The Estimated Commuter Additional Trips and Rail Infrastructure provides an an Transport for Wales (TfW) in October 2020 to assist the Replacement LDP in infor expected on rail infrastructure as a result of the implementation of strategic development alongside Bridgend County Borough Council to provide existing railway capacity improvements to the rail network, and identifying if any new infrastructure (or infrastructure) is required to support the proposed allocations. The Background Pape review of various technical studies that have taken place since the existing LDF analysing data collected by Transport for Wales (TfW), in October 2020, to assist informing what demand can be expected on rail infrastructure as a result of the in- development. The representor claims that the Paper has assessed 1,000 units and consideration was given 2,000 units being delivered on land east of Pyle the tra- capacity". However, no evidence has been provided to substantiate these claims

ability assessment, which has indeed, all other appropriate bly able to fund supporting orted.

site's sustainable location and n the station being relocated. acceptable in planning terms. en proposed for allocation due te "these are significant costs future mixed use development n. As clearly stated proposed the proposed future relocation for the proposed allocation is ettlement Assessment, Spatial

analysis of data collected by forming what demand can be oment. TfW have been working city and future changes and (or improvements to existing per provides a comprehensive DP was adopted, as well as sist the Replacement LDP in the implementation of strategic at Land East of Pyle and "if train services would be over ms. The Council has and will

typical travel patterns. Table 1: Strategic Candidate Site Quantum of Development identifies land east of Pyle of delivering 1,000 units. Whilst this is true for the current plan period, Pyle is actually identified to deliver 2,000 units in total which would have a greater impact on rail infrastructure. As identified above, Bellway consider the delivery of 2,000 units to be a strategic matter and as part of that consideration it is surely necessary for the technical evidence base documents to consider the full impact of the whole scheme to reach a robust assessment on the true impacts on infrastructure. As part of the literature review undertaken by the paper, it is noted that Bridgend County Borough Council commissioned an initial feasibility study for the re-location of the existing Pyle railway station to a more sustainable location, not only to increase the size of the station but also the proximity to the land east of Pyle. Whilst an initial feasibility may have been undertake, in reality it is would incur significant cost, have huge infrastructure complications and though some timeframes have been suggested, it is highly unlikely to progress within the revised plan period. Furthermore, it is identified that the main alternative to the relocation option is to improve the access and size of the car park to the existing station site which offers better value for money. Clearly, it is therefore evident that the position relating to key infrastructure to support the development on land east of Pyle remains unknown and subsequently it is wholly unsound to include the delivery of the railway station for the Allocation. Furthermore, any timescales involved in relocating the railway station will have knock on consequences to the housing trajectory for the plan period. Bellway do not consider there to be sufficient infrastructure to support the allocation of 2,000 homes on land east of Pyle. These observations simply add weight for the sites deallocation from the final version of the RLDP. In assessing 1,000 units on land east of Pyle, the paper anticipates 43 additional commuter trips

continue to maintain dialogue with TfW to effectively anticipate the impact this development will likely have on rail infrastructure, so that suitable mitigation measures and improvements can be offered. Future Plans beyond the Replacement LDP period would also re-consider this position accordingly.

travelling to Cardiff. Whilst this is based on a 50/50 split between sustainable and no sustainable modes i.e. the private car, the services are already close to maximum seated capacity on average with space to stand. Therefore, if consideration was given 2,000 units being delivered on land east of Pyle the train services would be over capacity.

Housing Trajectory It is noted that housing trajectory set out in Appendix 1 of the DCD and the Housing Trajectory Background Paper for Land East of Pyle include a total of 1,057 units in the plan period 2018-2033 with a further 943 units beyond the RLDP plan period. Bellway do not consider it appropriate to allocate housing of this scale across two development plan periods to justify an allocation in the current DCD and further justifies it as being more appropriate for SDP. The housing trajectory is not realistic. For all the technical matters outlined above, there is no way homes would start being delivered on site at the beginning of 2025 when there is no known developer on board. In light of the unknown costs of infrastructure requirements outlined above, the Land East of Pyle is not considered to be free from physical constraints or economically viable. A significant amount of work will be required to enable the site to be deliverable. Bellway consider the housing trajectory to be flawed and unsound if relying on the delivery of housing on Land East of Pyle. Even if the railway station is not relocated, it is likely that the delivery of the footbridge should be in place prior to the delivery of a first phase of housing. Bellway maintain Land East of Pyle should be deallocated and sites that are deliverable and viable should be pursued to ensure the Plan is robust and capable of delivering a housing trajectory. Conclusion Bellway strongly object to the inclusion of land east of Pyle being allocated and included within the RLDP. It is clear to Bellway that there are fundamental

questions which remain unanswered

De-allocate Land East of Pyle from the Replacement LDP due to viability and deliverability concerns and reconsider through the forthcoming SDP No action is considered necessary. The representor has claimed that "there is no way homes would start being delivered on site at the beginning of 2025 when there is no known developer on board" although has provided no evidence to substantiate this point.

As documented in the Candidate Site Assessment, the Land East of Pyle site promoter has robustly demonstrated delivery in accordance with the requirements set out in the Development Plans Manual. A detailed plethora of evidence has been provided to the Council to support its delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. The related housing trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting. As such, the proposed change to Land East of Pencoed trajectory is both unsubstantiated and not supported.

Moreover, work on the SDP has not yet commenced, regulations are yet to be finalised and site thresholds have not yet been defined through this process. The Bridgend Replacement LDP is being prepared in advance of the forthcoming SDP and is bound by a Delivery Agreement. A range of plan preparation options were considered in the Review Report before work on the Replacement LDP began. The Review Report recommended that the Council undertakes a full review of the existing LDP on an individual Local Planning Authority (LPA) area basis, wherever possible working collaboratively with other LPAs to produce a joint evidence base and with the region to prepare a SDP. Whilst the Council remains committed to the SDP process, the site promoter has clearly demonstrated that Land East of Pyle is both viable and deliverable during the Replacement LDP period, in accordance with the Growth and Spatial Strategy. The representor's concerns regarding cross boundary implications are unsubstantiated, especially considering Bridgend County Borough Council has remained in dialogue with Neath Port Talbot County Borough Council through plan preparation. Neath Port Talbot County Borough Council has submitted formal representations on the Bridgend Deposit Plan and cite no objections to this proposed allocation and support the Deposit Plan.

In addition, the number of dwellings Land East of Pyle is expected to deliver during the Replacement LDP is similar in scale to the other proposed Strategic Sites. Therefore, it is not considered appropriate to delay progress on site progression until a future SDP is adopted.

The representor has submitted a comprehensive viability assessment for Land at Heol Fach, North Cornelly. Therefore, demonstrating that the site is viable and deliverable. As stated in the Candidate Site Assessment (2022), "The candidate site is located on the periphery on North Cornelly which is identified as a Sustainable

regarding the viability of the allocation on land east of Pyle. Notwithstanding Bellway's view that the allocation of 2,000 units is a matter of a SDP and not for consideration in the RLDP, it evident that substantial work is required to demonstrate the economic viability of the scheme and the ability to deliver the required infrastructure to enable the scheme to be delivered. On this basis, the inclusion of Policy PLA5 results in the RLDP being unsound as it fails Test 3 of the Council's own Test of Soundness which are reflected in Section 64(2) of the 2004 Act and the Development Plans Manual. As detailed above, the proposed allocation will not deliver and it not realistic or appropriate and is not founded on a robust and credible evidence base. As such, land east of Pyle should be deallocated from the final version of the RLDP. While it is agreed that Pvle / Kenfig Hill / North Cornelly offers an opportunity for sustainable growth, it is considered that this would be more appropriately met through non-strategic sites rather than an urban extension. Such sites would have the ability to integrate with the existing settlement(s), provide infrastructure improvements and new infrastructure, and still benefit from the existing sustainable transport links on offer. Various edge of settlement sites have been submitted as candidate sites, which could make a substantial contribution to the required capacity of new allocations in this location. Therefore, Bellway remain unconvinced that the site is free from constraints or is economically viable to worthy its allocation in the RLDP. Bellway consider land at Heol Fach as a preferable location for development in terms of its ability to deliver much needed housing (including affordable housing) in the first phase of the RLDP period, thereby maintaining the Council's 5 year housing supply and proposed housing trajectory. Detailed justification for the allocation of land Heol Fach is provided below. Land at Heol Fach, North Cornelly Allocate Land at

Heol Fach, North

Therefore, demonstrating that the site is viable and deliverable.

Growth Area (as defined by SP1). The site is well serviced by the Active Travel network which will help foster and promote transit-oriented development. The site is considered to be free of any significant constraints. However, whilst the Candidate Site Assessment concludes by stating that site is considered to accord with the LDP strategy and has passed all tests of assessment, members of Cabinet have decided that this site is not required for allocation as they deem a 10% flexibility allowance is sufficient.

The representor has submitted a comprehensive viability assessment for Land at Heol Fach, North Cornelly.

Bellway has been promoting the land at	Cornelly because	
Heol Fach from the outset of the RLDP	the site promoter	As stated in the Candidate Site Assessment (2022), "The candidate site is located
process. Substantial technical and viability	claims a Viability	Cornelly which is identified as a Sustainable Growth Area (as defined by SP1). The
information has been provided to the	Assessment was	Active Travel network which will help foster and promote transit-oriented development
Council at each stage of the process to	submitted as part	be free of any significant constraints. However, whilst the Candidate Site Assessme
demonstrate that the site is both viable and	of the additional	site is considered to accord with the LDP strategy and has passed all tests of assess
deliverable within the first phase of the	information	have decided that this site is not required for allocation as they deem a 10% flexibilit
RLDP period. Despite the detailed	submitted to the	
submissions to the Council, land at Heol	Candidate Site	
Fach has not been considered for allocation	Stage 2	
in the DCD. As outlined above, Bellway	submissions in	
consider the omission of land at Heol Fach	September 2020	
as a housing allocation fails the Council's		
own Test of Soundness in respect of: • Test		
2 the housing allocations in Pyle are not		
sufficiently robust or flexible to ensure		
compliance with national policy as set out in		
Planning Policy Wales (PPW), and • Test 3		
in omitting land at Heol Fach as a housing		
allocation does not provide a reasonable		
level of flexibility to allow the Deposit Plan to deal with the housing requirement to		
meet local needs in Pyle/North Cornelly. A		
review of the reasons behind why the site		
has not been progressed within the RLDP		
has been undertaken to enable clarification		
to be provided to the Council to further		
demonstrate why the site is worthy of		
allocation within the final version of the		
RLDP. Attention has focussed on the		
reasons sets out in the Candidate Site		
Assessment Report (2021) and the		
Sustainability Appraisal for the Deposit		
Plan. The identified reasons and Bellway's		
response are set out below: Candidate Site		
The land at Heol Fach is considered under		
candidate site reference 222.C1. Appendix		
6 of the Candidate Site Assessment Report		
(2021) sets out the candidate sites that have		
not progressed beyond Stage 2 of the		
Assessment. In this instance, the Stage 2		
conclusion for land at Heol Fach states:		
"The candidate site is located on the		
periphery of North Cornelly which is		
identified as a Sustainable Growth Area (as		
defined by SP1). A lack of supporting		
information has been submitted in order to		
enable full assessment of the site,		
specifically a viability assessment.		
Additionally, there are highway issues and		

ted on the periphery on North he site is well serviced by the nent. The site is considered to ment concludes by stating that essment, members of Cabinet bility allowance is sufficient.

also education capacity issues in the are whereby a site of this size would further exacerbate without the ability of resolvin them. As such, there are considered to b other sites more issues. Therefore, this sit will not be allocated in the Deposit Plan Bellway are disappointed with the reaso for the land at Heol Fach not bein progressed to an allocation given that Viability Assessment was submitted as pa of the additional information submitted to the Candidate Site Stage 2 submissions in September 2020. Notwithstanding that the cover letter welcomed further discussion with the Council relating to viability.	e e e "" n g a t t o n e	
In terms of highways issues, Bellway an their technical consultants (Asbri Transpor have had discussions with relevan Highway Officers and submitted furthe technical work in October 2020. An update Transport Assessment (TA) prepared b Asbri Transport details the changes mad to the scope and methodology of th assessment as suggested by the Cound Highway Officers. As set out in the T access to the site is proposed via a ghos island right turn lane with Heol Fach direct adjacent to the existing residential area within North Cornelly. The site benefits from pedestrian access from at least fiv locations on site which are to be retained a part of the proposal. The site is therefor considered highly permeable from pedestrian perspective. A pedestria crossing will be provided directly adjacent t the access to the south. At this time it is proposed that the crossing take the form of an uncontrolled pedestrian crossing wit central refuge island. This will provide connection between the 3-metre-wid shared use route on the southern peripher of the proposed access road and th footpath on the opposing side of the B428 carriageway. The site also connects direct to active travel route PYC1. To the north of the crossing the footpath on the easter side of the carriageway will be upgraded t allow for an extension of the walking an cycling route directly into the site. To the	<ul> <li>Heol Fach, North Cornelly, as the site promoter considers there to be no material reasons from a highway and transportation perspective to restrict the site being allocated.</li> </ul>	It is noted that the proposer of the site has submitted a Transport Assessment to su assessment seeks to show that the vehicular traffic generated from the site will not p the local highway network.

# support the allocation and the ot present a material impact on

south of the crossing the footpath will		
continue to continue to facilitate pedestrian		
connections with the bus stop provision and		
the existing residential population of North		
Cornelly. The TA sets out the active travel		
infrastructure and routes whilst also		
demonstrating that there are a large number		
of facilities within the immediate vicinity of		
the site which are within the 2 mile distance		
identified by the Active Travel Act.		
Therefore, it has been demonstrated that		
the site will link to existing and new		
infrastructure as required by the Active		
Travel (Wales) Act 2013. The updated TA		
does consider the increase in traffic along		
Marlas Road and the capacity of the		
signalised junction over the railway bridge.		
In both instances, the updated TA		
demonstrates that the likely impact on		
Marlas Road Railway Bridge and Marlas		
Road /A48/A4229/ School Terrace		
roundabout is 0% and 2% respectively		
which is considered de minimis. The		
capacity assessment for Marlas Road		
Railway Bridge also shows that the junction		
has significant spare capacity across all		
arms of the junction with the inclusion of the		
proposed development. Whilst it is		
appreciated that updated assessments		
would be required as part of an application		
submission, the TA demonstrates that there		
are no existing highways safety pattern or		
problem within the vicinity of the site which		
would be exacerbated by the proposed		
development. There is sufficient multi-		
modal access via an established and		
proposed network of active travel routes		
and existing public transport services within		
the vicinity of the site. Finally, there is		
sufficient capacity within the local highway		
network to accommodate the development		
in peak periods. Therefore, there are no		
material reasons from a highway and		
transportation perspective to restrict the site		
being allocated as part of the final version of		
the RLDP.		
In relation to education, it is not unusual for	Allocate Land at	The representor has submitted a comprehensive viability assessment for Land at
a development of this scale and nature to be	Heol Fach, North	Therefore, demonstrating that the site is viable and deliverable whilst providing ful
subject to Section 106 contributions which	Cornelly, as the	stated in the Candidate Site Assessment (2022), "The candidate site is located
· -		

at Heol Fach, North Cornelly. full education contributions. As ted on the periphery on North

<ul> <li>Belway would seek to agree with the Councils Education Department to discuss the free of any significant constraints. However, whilst the Candidate Site Assessment for the site not being progressed all tests of assessment fuely requirements as early as possible to inform the development to first as early as possible to inform the development to discuss on the area divergences. It is not required for allocation as they deem a 10% flexibility appraisal. The the area divergences are appropriate suite is considered to account with the LOP strategy and has passed all tests of assessment fuely strategy and has passed all tests of assessment fuely assessment fuely and the strategy and has passed all tests of assessment fuely and the strategy and has passed all tests of assessment fuely and the strategy and has passed all tests of assessment fuely and the strategy and has passed all tests of assessment publics and the councils. Education candidate Site Assessment and the development on any aging with development any aging with development as a strategy and has passed all tests of assessment publics and the councils. Education the Councils Education as they deem a 10% flexibility appraisal. The the any appropriate suite of any significant beneficial with the CDP and the councils. Education the councils are appropriated with the CDP and the councils are appropriated with the CDP and the councils. Education the state and the councils are appropriated with the CDP and the councils. Education the state and the appropriates and the appropriates and the appropriates and the appropriates and the appropriate suite of and the state appropriate suite of and the state appropriate suite approprist suite approprist appropriates and appropriate suite appro</li></ul>			
<ul> <li>is considered within The Full Sustainability Appraisal of the Deposit Plan under Candidate Site Reference 222.C1. The site is considered under Reasonable Atternative sont included within the RLDP.</li> <li>Atternative are assonable atternative option does not imply BCBC either should or mut- site is a considered under Reasonable Atternative sont included within the RLDP.</li> <li>Atternative are assonable atternative option does not imply BCBC either should or mut- site is a considered under Reasonable identified likely significant abeneficial effects with the only likely significant beneficial effects with the state is previously developed iand or dicentified land. In addressing the SA objective SA12a). The SA site assessment criteria relates to whether the significant does represent the development on adjacent to the existing settlement boundary and would result in development on Greenfield land. In addressing the SA objective Sait development on and considering the design mitigation options, the following commentary is provided: Initial policy level mitigation options, the following commentary is provided: Initial policy level mitigation requires a proposal to demonstrate (continued) need for development on Greenfield Land where appropriate and demonstrate maximum efficiency and sustainability of land use. The need for development on Greenfield land has been evidence to the Plan. This includes the is located on the periphery on North Corr Sustainabile Growth Area (as defined by SP1). The site is well serviced by the Acti- help foster and promote transit-oriented development. The site is considered to constraints. However, whilst the Candidate Site Assessment concludes by stati- nactional befrowth Area (as defined by SP1). The site i</li></ul>	Council. Bellway have previously attempted and are keen to open a dialogue with the Council's Education Department to discuss likely requirements as early as possible to inform the development process. It is not considered fair or helpful to have a generic response for the site not being progressed giving 'education capacity issues in the area whereby a site of this size would further exacerbate without the ability of resolving them' without the Council's Education Department engaging with developers despite efforts being made by Bellway to address concerns or discuss contributions	does not consider it 'fair or helpful' for the site not being progressed due to education capacity issues in	Active Travel network which will help foster and promote transit-oriented developme be free of any significant constraints. However, whilst the Candidate Site Assessme site is considered to accord with the LDP strategy and has passed all tests of asses
and Sustainable Urban Growth Led Strategy that is promoted through the	is considered within The Full Sustainability Appraisal of the Deposit Plan under Candidate Site Reference 222.C1. The site is considered under Reasonable Alternatives not included within the RLDP. Overall the site is considered to have mostly likely significant beneficial effects with the only likely significant adverse effect being identified against Sustainable Placemaking (SA Objective SA12a). The SA site assessment criteria relates to whether the site is previously developed land or Greenfield land. In this context, the site does represent the development on land adjacent to the existing settlement boundary and would result in development on Greenfield land. In addressing the SA objective against the initial policy mitigation and considering the design mitigation options, the following commentary is provided: Initial policy level mitigation requires a proposal to demonstrate (continued) need for development on Greenfield Land where appropriate and demonstrate maximum efficiency and sustainability of land use. The need for development on Greenfield land has been evidenced through the RLDP evidence	Heol Fach, North Cornelly, as the site is a 'Reasonable Alternative' within the SA, greenfield sites are necessary to deliver the strategy and the proposal would not have a likely significant adverse effect on Sustainable Placemaking SA Objective SA12a	constituting a reasonable alternative option does not imply BCBC either should or ne site, rather only that the site does not have 'showstopper' constraints and is therefore by BCBC as a potential site allocation. Full SA site assessment findings detailed identified likely significant effects (beneficial or adverse) and proposed mitigation, I by BCBC in selecting an appropriate suite of proposed site allocations and infrast identified needs. Informed by this SA Report, the Candidate Site Assessment publish the Deposit Plan confirms and provides reasoned justification for the outcome of t respect of each candidate site" para 5.3.10. As also documented within the SA Report, the majority of existing, viable, brownfir recently been delivered under the existing LDP or are committed and expected to of few years. However, remaining viable opportunities on previously developed land are greenfield sites are required in a sustainable manner through complementary alloca settlements. Identification of appropriate proposed allocations has been undertaken Search Sequence and other requirements set out in Planning Policy Wales, as evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy Housing Trajectory Background Paper and Minimising the Loss of BMV Agricultur. The rationale for the proposed allocations within the Deposit Plan is clearly out Assessment. Without exception, all proposed sites are supported by a large bod evidence to demonstrate their deliverability. However, the representor has submitted a comprehensive viability assessment for Cornelly. Therefore, demonstrating that the site is viable and deliverable. As st Assessment (2022), "The candidate site is located on the periphery on North Corr Sustainable Growth Area (as defined by SP1). The site is well serviced by the Activ help foster and promote transit-oriented development. The site is considered to constraints. However, whilst the Candidate Site Assessment concludes by statin accord with the LDP strategy and has passed all tests of
	and Sustainable Urban Growth Led Strategy that is promoted through the		

The site is well serviced by the nent. The site is considered to nent concludes by stating that essment, members of Cabinet bility allowance is sufficient.

tification of a candidate site as need to allocate the individual ore 'available' for consideration ed in Appendix G, including all n, have been taken account of rastructure proposals to meet lished by BCBC to accompany of the site selection process in

Infield regeneration sites have o come forward within the next are exhausted, therefore some cations on the edge of existing ten in accordance with the Site as documented in supporting gy Options Background Paper, tural Land Background Paper. butlined in the Candidate Site body of technical and viability

for Land at Heol Fach, North stated in the Candidate Site ornelly which is identified as a ctive Travel network which will to be free of any significant ating that site is considered to a of Cabinet have decided that sufficient. Options Background Paper builds on extant evidence which includes the availability and suitability of brownfield land in preference to Greenfield amongst a range of other factors. The Regeneration and Sustainable Urban Growth Led Strategy seeks to prioritise the development on land within or on the periphery of urban areas. Due to regeneration opportunities being limited as a result of the existing LDP strategy, additional sites including some Greenfield would be required.

Paragraph 4.37 identifies accompanying growth would be channelled towards Bridgend, Pencoed and Pyle, North Cornelly and Kenfig Hill in recognition of their positions in the Settlement Hierarchy, high levels of need for affordable housing and capacity to accommodate growth in a sustainable manner. The paper goes onto to identify Pyle / North Cornelly / Kenfig Hill as a SGA to ensure a deliverable supply of housing land.

The Strategic Growth Options background paper clearly identifies that the Mid Growth Option which is being progressed through the RLDP would require some Greenfield sites to be developed in accordance with the Planning Policy Wales' site search sequence. The paper goes on to identify that whilst this Option would place an element of pressure on some Greenfield sites, growth would be accommodated in a sustainable manner at the edge of existing settlements. The paper also recognises that development at the edge of settlements would provide significant scope to deliver necessary infrastructure, secure affordable housing and complement existing centres by linking new homes to employment and services via sustainable multi-modal forms of transport. In this context, the background evidence underpinning the RLDP clearly demonstrates the need for development on Greenfield land to be in a position to deliver much needed housing and the RLDP Spatial Strategy. Bellway consider that despite the land at Heol Fach being

Greenfield it is sequentially preferable in terms of being located adjacent to the existing settlement boundary. It has defined boundaries on all sides; the M4 lies to the southwest, Heol Las lies to the north west and Heol Fach lies to the north east. Whilst residential dwellings along Heol Maendy, Heol Nant and Fairways form the south eastern boundary. The location of the site is logical location for development adjoining an existing settlement and located within a defined SGA. Development of the site would not represent a significant incursion into the countryside or set a precedent for further land release in this location due to the existing boundaries. The land at Heol Fach is capable of delivering market and affordable homes in a location that can be served by sustainable multi-modal forms of transport. It is evident therefore, Bellway are making every effort to ensure maximum efficiency and sustainability in terms of the proposed land use as demonstrated through all the technical and viability reports and the Site Promotion Document previously submitted to the Council.

The Initial Design Mitigation for this SA objective is for design to minimise Greenfield land take and construction impacts, where appropriate. In terms of design mitigation, Bellway have endeavoured to demonstrate to the Council from the outset that the proposal is being designed sustainably through the submitted masterplan within the Site Promotion Document. The Council in their response, dated June 2020, confirmed that the plans have been a useful illustration of how the site could be developed and demonstrate a response to the identified opportunities and constraints of the site. Urban Design Box have produced an Open Space Technical Note. The open space calculations are based on 255 homes and a forecasted population of 602 (based on average household of 2.36). The note illustrates the wide and varied provision of open space proposed on the site, combining to provide a considered masterplan. Furthermore,

initial design mitigation has already been included within the Site Promotion Document previously submitted to the Council in terms of demonstrating consideration of the urban landscape (townscape), technical matters including ecology and landscape to deliver a landscape and ecology led approach to the proposal which is reflected through an appropriate design. It is considered that at this stage, Bellway have provided sufficient initial design mitigation to demonstrate that the proposal would not have a likely significant adverse effect on Sustainable Placemaking SA Objective SA12a. It is also noted that any proposal would have to satisfy the requirements of emerging Policy SP3 Good Design and Sustainable Placemaking and Policy SP6 Sustainable Housing Strategy at application stage which are the identified Deposit Plan policies relevant for Sustainable Placemaking SA Objective SA12a.

## Conclusion

In light of the above, it is considered that the need for development on Greenfield land has already been demonstrated through the RLDP evidence base of which Bellway supports. Bellway considers that the proposal does include initial design mitigation to ensure the retention of trees and hedgerows, informal public open space and sustainable drainage measures whilst also delivering housing and substantial open space. It is therefore questioned, how the land at Heol Fach can be scored negatively or considered to have a likely significant adverse effect on Sustainable Placemaking SA Objective SA12a when need for development on greenfield land is demonstrated through the Council's own evidence base and promoted through the emerging spatial strategy in the RLDP. Bellway have provided substantial evidence to demonstrate initial design mitigation for the loss of Greenfield land through retained green features and substantial open space provision. Furthermore, it cannot be ignored that the allocation of land east of Pyle is

likely to have a much greater impact on the loss of greenfield land take and construction impacts compared to the release of land at Heol Fach which is a logical extension to the North Cornelly within the defined Pyle / North Cornelly / Kenfig Hill SGA. Yet the Council consider land east of Pyle to not score negatively against the Sustainable Placemaking SA Objective SA12a. In fact the SA does not comment on whether land east of Pyle is likely to have a likely significant beneficial or likely significant adverse effects on the SA Objective. A point that should be revisited in terms of ensuring a robust approach is taken in assessing sites within the Sustainability Appraisal for the RLDP before examination and in time adoption. <u>Overall conclusion</u> In light of the above, Bellway consider the reasons for land at Heol Fach not being	Allocate Land at Heol Fach, North	The representor has submitted a comprehensive viability assessment for Land at H Therefore, demonstrating that the site is viable and deliverable. As stated in the Ca
progressed in the Candidate Site Assessment to be unreasonable and not justified given the open invite to liaise with Council over viability in addition to the evidence already presented. The additional technical work that has been provided in respect of highways demonstrates that there are no material reasons from a highway and transportation perspective to restrict the site from being progressed forward as an allocation in the RLDP. Plus an updated Transport Assessment would be undertaken once COVID restrictions allow to further demonstrate that the proposal will not result in highway issues. Similarly, Bellway have continued to engage with Education Department to no prevail. As previously stated Bellway are willing to provide relevant Section 106 contributions relevant to education where appropriate. In respect of the findings of the SA for the Deposit RLDP it is considered for the reasons outlined above that Bellway has demonstrated that there will be no likely significant adverse effects on the Sustainable Placemaking SA Objective SA12a. As a consequence the proposal is	Cornelly for the reasons mentioned above	(2022), "The candidate site is located on the periphery on North Cornelly which is in Growth Area (as defined by SP1). The site is well serviced by the Active Travel nets and promote transit-oriented development. The site is considered to be free of a However, whilst the Candidate Site Assessment concludes by stating that site is con LDP strategy and has passed all tests of assessment, members of Cabinet have d required for allocation as they deem a 10% flexibility allowance is sufficient.

t Heol Fach, North Cornelly. Candidate Site Assessment s identified as a Sustainable network which will help foster f any significant constraints. considered to accord with the e decided that this site is not

	considered to only have likely significant beneficial effects against the SA objectives. The omission of not allocating land at Heol Fach is considered to fail Tests 2 and 3 of the Council's own Tests of Soundness which are reflected in the Development Plans Manual and national legislation. Bellway strongly recommends the land at Heol Fach should therefore be allocated for development in the final version of the RLDP.		
273	Land at Waun Bant Road, Kenfig Hill (ref. 291.C1) A significant amount of work has been undertaken in support of the allocation of this site within the BRLDP. This work concluded that there were no significant barriers to development, subject to mitigation which could be managed through appropriate planning conditions or through S106 contributions. This 5.64ha site is located on the eastern side of Kenfig Hill along Waun Bant Road, Kenfig Hill is 8kms to the west of Bridgend and about 1.5kms north of the M4 transport corridor. The Site consists of several small to medium-sized fields and which slopes in a similar fashion to the land in the western part of the present settlement. Levels on the northern boundary are around 95m -100m Above Ordnance Datum (AOD), with the terrain then falling southwards to approximately 72m AOD southern boundary. The adjoining existing housing areas have a poor visual relationship with the surrounding countryside and the openness of the settlement boundary gives the Site a distinct urban fringe character. The proposed high quality residential development put forward as part of the quality of the eastern edge of Kenfig. Development would be contained within a strong defensible edge, provided by the existing mature tree and hedgerow cover.	Allocate Land at Waun Bant Road, Kenfig Hill (Candidate Site 291.C1)	No action is considered necessary. The Candidate Site Assessment clearly explair Road, Kenfig Hill (ref. 291.C1) has not been proposed for allocation. The extract is reference: "The site is located on the edge of the existing settlement of Kenfig Hill which is Growth Area (as defined by SP1). When compared to the other sites in the area tha as allocations in the Plan, the site is less sustainable in that it is located further from poor pedestrian connectivity. The site would lead to an increase in the dependent therefore not encourage a modal shift to more sustainable forms of active travel. The allocated for development in the Deposit Plan" The proposal to allocate Land at Waun Bant Road, Kenfig Hill is not supported.

lains why Land at Waun Bant is provided below for ease of

is identified as a Sustainable hat have been carried forward om facilities and services with dency on the private car and The site will not therefore be The various reports undertaken to support the Candidate Site Stage 2 submission shows that there are no immediate barriers to the development of the site. The viability information submitted shows that the site is viable and deliverable. Further discussions with BCBC have identified that there are capacity issues with local schools, however the viability assessment includes full provision for an education provision in accordance with the latest SPG.

It is noteworthy that the delivery of the improvements to the schools in the area is something Edenstone would be happy to assist BCBC with, however, at this stage a commitment to providing the appropriate level of contribution is made. It is also noteworthy that in response to a request by BCBC, additional technical note was prepared by Vectos in support of the site relating to its ability to connect into existing and proposed active travel routes. This note confirmed that an extended footway connection on Waun Bant Road is proposed as part of the development. This will facilitate connections along Waun Bant Road but also support movement via Woodlands Park to Bridgend's existing and emerging integrated foot and cycle network. According to the Candidate Site Assessment Report the site has not been included in the Deposit Draft LDP for the following reason: "The site is located on the edge of the existing settlement of Kenfig Hill which is identified as a Sustainable Growth Area (as defined by SP1).

When compared to the other sites in the area that have been carried forward as allocations in the Plan, the site is less sustainable in that it is located further from facilities and services with poor pedestrian connectivity. The site would lead to an increase in the dependency on the private car and therefore not encourage a modal shift to more sustainable forms of active travel. The site will not therefore be



allocated for development in the Deposit Plan"

Such a statement is entirely inaccurate. It is noteworthy that comparison is drawn with other sites in the Plan that are carried forward as allocations in the Plan, however, there are no other similar sites allocated within the Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area save for a large Strategic allocation discussed above.

Vectos have undertaken further assessment of the potential for active travel linkages from the site and the full note is provided in Appendix 1, however, in summary there are considered to be a number of small interventions that can be made to the active travel network that can improve the sustainability credentials of the site.

Improvements to wayfinding and signage have been identified as being a key improvement and will increase awareness of the good cycle infrastructure located near the site. Removal of access restrictions to the cycle routes will further enhance the utility of the routes.

Currently the cycle network is fragmented in parts and linking these together with minor infrastructure alterations will allow for a more cohesive network. This network can then be integrated with the future improvement works by BCBC from Pyle to Porthcawl. These measures will complement the current cycle network and create viable routes for users of the site to utilise. The current walking infrastructure in the vicinity of the site is generally good, although there are sections of narrower footway. The footway along Waun Bant Road is narrow in parts, with limited tactile paving for crossings. The nearest local facilities are also located a short distance away. Pedestrians can however cross the relatively quiet Waun Bant Road without difficulty, due to the quiet residential nature



of the road. The walk to the local facilities is at a low gradient, and the low traffic volumes should make it a reasonably pleasant walk. There is little that can practically be undertaken to widen existing footways given the extent of adopted highway and adjacent property boundaries. There is however little need for this to be undertaken. Overall, there are a number of interventions that can be made to further enhance the active travel network, with additional schemes currently being investigated by BCBC. These are focussed on cycle infrastructure, with limited options for boosting pedestrian access. The preferred strategy outlines four Strategic Objectives for the plan period which are set out below: • SOBJ1: To Create High Quality Sustainable Places (Placemaking) • SOBJ2: To Create Active, Healthy, Cohesive and Social Communities SOBJ3: To Create Productive and Enterprising Places • SOBJ4: To Protect and Enhance Distinctive and Natural Places We believe that the proposed housing development on the Site is entirely consistent with these objectives. The suite of technical reports prepared for this candidate site have confirmed that the site can be successfully developed without material harm and would be a positive addition to the settlement. The supply of housing will create a high guality sustainable place, provide additional housing to Kenfig, is within proximity to a large area of employment land and utilises a currently under-used site on the edge of the settlement. Accordingly, we would conclude that the proposed development site should be allocated for housing within the Replacement Bridgend Local Development Plan in that it would make a valuable and positive contribution towards housing delivery in the area; providing a range and



choice of homes for the residents of Kenfig and the wider communities.		
<ul> <li>Pen-y-Castell Farm, Kenfig Hill (site ref. 307.C1)</li> <li>The site was submitted as a candidate site under Stage 1 (site ref. 307.C1 - Pen-y-Castell Farm, Kenfig Hill), however, no further information was submitted in support of the site to allow BCBC to make any further assessment of its suitability for allocation.</li> <li>Over recent months, Edenstone Homes have been in discussions with the landowners of the site with a view to securing an option agreement on it. These discussions have been very positive and are in the advanced stages.</li> <li>Edenstone Homes acknowledge that the lack of information in respect of the suitability of the site for residential development means that it may not be possible for a site combining this and the land north of Waun Bant Road to be allocated as part of this RLDP process. If, however, Officers consider this is an option that ought to be explored further, Edenstone Homes would be willing to pull together a suite of information of sites would allow for a greater number of dwellings to be delivered in proximity to the larger strategic allocation and directly adjacent to active travel network. Furthermore, it would mean that the Pyle/Kenfig Growth Area could deliver housing at an early stage, rather than relying on the strategic allocation which could take years to come forward.</li> </ul>	Allocate Pen-y- Castell Farm, Kenfig Hill (Candidate Site 307.C1)	The Candidate Site Assessment clearly explains why Pen-y-Castell Farm, Kenfig Hil proposed for allocation. The extract is provided below for ease of reference: "The site is located on the edge of the existing settlement of Kenfig Hill which is Growth Area (as defined by SP1). The site has not been allocated for residential pu of supporting information covering key issues such as highway constraints, ecologic topography and landscape issues etc. Given the lack of detail at this stage on the p difficult to assess the site in the context of a possible land use allocation. Therefor proposed in the Deposit Plan." The proposal to allocate Pen-y-Castell Farm, Kenfig Hill is not supported.

Hill (ref. 307.C1) has not been

is identified as a Sustainable purposes due to the absence ogical constraints in addition to proposed use of the site, it is efore, no specific allocation is In conclusion whilst the overall approach to housing delivery within the Deposit Bridgend Replacement Local Development Plan has some merit, there are grave concerns in respect of the ability to deliver on the housing numbers within the early years of the Plan; particularly given the delays that are inevitably going to occur for the larger strategic sites along with the unknowns and fluctuations in the delivery of windfall sites.

Accordingly, such concerns would therefore indicate that the plan is un-sound under Test 3 – Delivery, in that there are question marks over the timing of the delivery along with the lack of appropriate contingency to deal with the likely slippage in delivery of larger Strategic sites. Bridgend County Borough Council

An appropriate approach, as was initially indicated within the Preferred Strategy, would be to allocate a greater number of smaller or medium sized sites that would be capable of being delivered early in the plan whilst the larger sites are being progressed through the planning system. Sites such as Edenstone Homes at Waun Bant Road, Kenfig Hill would provide an 'oven ready' site with no apparent material planning consideration that would delay the approval of a planning application.

The site would therefore be able to deliver circa.150 homes early in the Plan. We have shown within this submission that the reasons for not including the site within the plan, i.e. that there are sites with better connections to services and facilities and active travel connections than ours is clearly incorrect. Accordingly we would object to policies SP1 – Regeneration and Sustainable Growth Strategy, SP6 – Sustainable Housing Strategy, and COM1 – Housing Allocations of the Replacement Local Development Plan.

Object to policies SP1 (Regeneration and Sustainable Growth Strategy), SP6 (Sustainable Housing Strategy), and COM1 (Housing Allocations) due to deliverability concerns. The Preferred Strategy identified a range of potential types of sites that could deliver the Growth and Spatial Strategy. These included Regeneration Sites, Sustainable Urban Extensions, Edge of Settlement Sites and Local Settlement Sites. The Council has taken into account the full SA site assessment findings detailed in Appendix G of the Sustainability Appraisal, to select an appropriate suite of proposed site allocations and infrastructure proposals to meet identified needs. Informed by this SA Report, the Candidate Site Assessment confirms and provides reasoned justification for the outcome of the site selection process in respect of each candidate site. The Deposit Plan has only proposed site allocations where capacity was clearly demonstrated to accommodate the respective level of growth within the settlement and/or necessary facilities and infrastructure improvements could be provided in support of the development. The final selection of proposed allocations, and accompanying justification, is provided in the Candidate Site Assessment.

The Strategy seeks to deliver several large-scale Sustainable Urban Extensions, which is necessary to create sustainable communities that will incorporate a mix of complementary uses and deliver improvements to existing infrastructure and/or provide new supporting infrastructure. Indeed, this latter factor is particularly notable given the school capacity issues across the 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. Sustainable Urban Extension sites have been proposed for allocation where they can best support the Replacement LDP Vision and Objectives and are capable of delivering mixed use development at a scale that will enhance communities.

Identification of appropriate Sustainable Urban Extensions has been undertaken in accordance with the Site Search Sequence and other requirements set out in Planning Policy Wales, as documented in supporting evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy Options Background Paper, Housing Trajectory Background Paper and Minimising the Loss of BMV Agricultural Land Background Paper. The rationale for the proposed allocations within the Deposit Plan is clearly outlined in the Candidate Site Assessment. Without exception, all proposed sites are supported by a large body of technical and viability evidence to demonstrate their deliverability.

The total housing provision, and spatial distribution thereof, has also been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting.

In addition, an appropriate flexibility allowance (10%) has been embedded into the Deposit Plan and the basis for which is clearly set out in the Housing Trajectory Background Paper. The flexibility allowance recognises the fact that there may be certain specific circumstances, unknown at the plan making stage, that delay the delivery of sites, notwithstanding the robust frontloading of site delivery evidence. This is a large flexibility allowance, chosen specifically to enable the Replacement LDP's housing requirement to remain comfortably deliverable in the event that a strategic site fails to come forward as anticipated at this point of plan preparation. With a 10% flexibility allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur.

The proposal to re-apportion growth away from the proposed strategic sites and towards Land at Waun Bant Road, Kenfig Hill (Candidate Site 291.C1) and Pen-y-Castell Farm, Kenfig Hill (Candidate Site 307.C1) is not supported. The final selection of proposed allocations, and accompanying justification, is provided in the Candidate Site Assessment.

Land at Zig Zag Lane, Porthcawl (ref: 221.C2)	Allocate Land at Zig Zag Lane,	No action is considered necessary. As stated in the Candidate Site Assessment, "The outside the settlement of Porthcawl which is identified as a Regeneration Growth
This letter relates specifically to the Land at Zig Zag Lane, Porthcawl candidate site (ref: 221.C2) and the sustained position of	Porthcawl (candidate site ref: 221.C2)	Brownfield sites will primarily provide the required capacity to accommodate growth we Areas. The site represents a large scale Greenfield extension to the existing settlement undermine the Preferred Strategy. Therefore it is considered to represent an unaccountryside, as such this site will not be assessed as part of Stage 2".
Persimmon Homes West Wales that the site should be allocated for the provision of up to 443 homes within the Deposit Plan. To the benefit of the existing and future residents in the locality, the candidate site would likewise provide the necessary land to enable the delivery of a two-form entry primary school (including a sports pitch) and a local centre, to act as a central community hub. As such, Persimmon Homes West Wales object to the Deposit Plan on the basis that the sites' exclusion from Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1 renders the plan		Notwithstanding the representor's comments, the proposal to allocate Land at Zig Za accord with the Replacement LDP's Spatial Strategy as the site is outside of the Porth Area. The proposal is therefore not supported.
<u>Background</u> The Zig Zag Lane candidate site comprises 25 ha of presently greenfield land to the north of the A4106 (Bridgend Road) and would form a logical northern extension to Porthcawl, as a main settlement in the County Borough (see Figure 1).		
The Zig Zag Lane candidate site is being actively promoted by Persimmon Homes West Wales (as the future developer) and is part subject option agreement / part subject to advanced discussions with owners. In view of this, the deliverability complexities relating to land transfers / assembly and delays connected to house-builder involvement in the formulation of concept masterplans etc associated with landowner / Council promoted sites largely do not apply to this candidate site, as the ultimate developer has had involvement in the site promotion from the outset. The site is deemed to be deliverable within the early stages of the Plan Period and could		
1	<ul> <li>221.C2)</li> <li>This letter relates specifically to the Land at Zig Zag Lane, Porthcawl candidate site (ref: 221.C2) and the sustained position of Persimmon Homes West Wales that the site should be allocated for the provision of up to 443 homes within the Deposit Plan. To the benefit of the existing and future residents in the locality, the candidate site would likewise provide the necessary land to enable the delivery of a two-form entry primary school (including a sports pitch) and a local centre, to act as a central community hub. As such, Persimmon Homes West Wales object to the Deposit Plan on the basis that the sites' exclusion from Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1 renders the plan 'unsound'.</li> <li><u>Background</u></li> <li>The Zig Zag Lane candidate site comprises 25 ha of presently greenfield land to the north of the A4106 (Bridgend Road) and would form a logical northern extension to Porthcawl, as a main settlement in the County Borough (see Figure 1).</li> <li>The Zig Zag Lane candidate site is being actively promoted by Persimmon Homes West Wales (as the future developer) and is part subject option agreement / part subject to advanced discussions with owners. In view of this, the deliverability complexities relating to land transfers / assembly and delays connected to house-builder involvement in the formulation of concept masterplans etc associated with landowner / Council promoted sites largely do not apply to this candidate site, as the ultimate developer has had involvement in the site promotion from the outset. The site is deemed to be deliverable within the early</li> </ul>	221.C2)Zig Zag Lane, PorthcawlThis letter relates specifically to the Land at Zig Zag Lane, Porthcawl candidate site (ref: 221.C2) and the sustained position of Persimmon Homes West Wales that the site should be allocated for the provision of up to 443 homes within the Deposit Plan. To the benefit of the existing and future residents in the locality, the candidate site would likewise provide the necessary land to enable the delivery of a two-form entry primary school (including a sports pitch) and a local centre, to act as a central community hub. As such, Persimmon Homes West Wales object to the Deposit Plan on the basis that the sites' exclusion from Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1 renders the plan 'unsound'.Background The Zig Zag Lane candidate site comprises 25 ha of presently greenfield land to the north of the A4106 (Bridgend Road) and would form a logical northern extension to Portncawl, as a main settlement in the County Borough (see Figure 1).The Zig Zag Lane candidate site is being actively promoted by Persimmon Homes West Wales (as the future developer) and is part subject option agreement / part subject to advanced discussions with owners. In view of this, the deliverability complexities relating to land transfers / assembly and delays connected to house-builder involvement in the formulation of concept masterplans etc associated with landowner / Council promoted sites largely do not apply to this candidate site, as the ultimate developer has had involvement in the early stages of the Plan Period and could

The Candidate Site is located th Area (as defined by SP1). h within Regeneration Growth ement of Porthcawl that would acceptable incursion into the

Zag Lane, Porthcawl is out of rthcawl Regeneration Growth

# Key Considerations relating to the residential allocation of Zig Zag Lane, Porthcawl

The Zig Zag Lane site is deemed to represent a sustainably located and deliverable candidate site for new homes the following key reasons:

# Sustainability Considerations

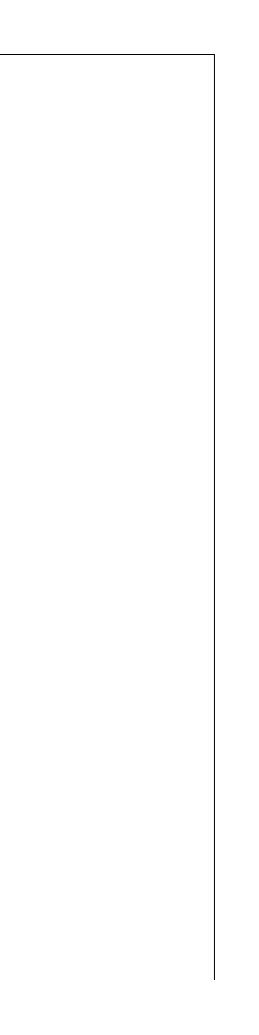
• Sustainability - In terms of sustainability and active travel, the candidate site adjoins the settlement of Porthcawl to the north, with the town centre lying within easy walking / cycle distance (c. 2 km). In view of the sites' location on the A4106, several bus stops in within close proximity of the site to the south Woodland Avenue (60m) and to the east on Newton Nottage Road (150 m), providing regular services (X2 Cymru Clipper, 172, 404 and 861) around Porthcawl, Bridgend and Aberdare. Various key employers are situated within walking / cycle distance or via public transport including Trecco Bay Holiday Park, Newton Care Home and various shops and services within the town centre and seafront.

• Community Facilities - Various community facilities lie within easy walking / cycle distance of the candidate site, including the recently completed Porthcawl Medical Centre at Clos Y Mametz (c. 60 m to the south)

• Education – In terms of educational provision, there are several primary schools including St Clares School and Nursey, Porthcawl Primary School and St Johns School all within 400 m of the site. The secondary school servicing the site would be Ysgol Gyfun Porthcawl which likes c. 1.6 km to the south west and therefore is commutable by bus or cycle.

# Environmental Considerations

• Ecology - There are no statutory or nonstatutory ecological designations relating to



the candidate site at present, albeit the intention to designate Manor Farm Fields as SINC is acknowledged and discussed in the following section. The closest statutory ecological designations are located within 2 km which include; Merthyr Mawr Warren National Nature Reserve (0.7 km south east) (NNR), Merthyr Mawr Site of Special Scientific Interest (SSSI) (1km south east) and Kenfig Special Area of Conservation (SAC) (1km south east). The Ecological Desk Based Assessment (WYG, November 2017) confirms that the site is deemed unlikely to have an significant and / or unsurmountable environmental constraints, due to the high levels of management of the fields and grazing by local ponies, sheep and cattle.

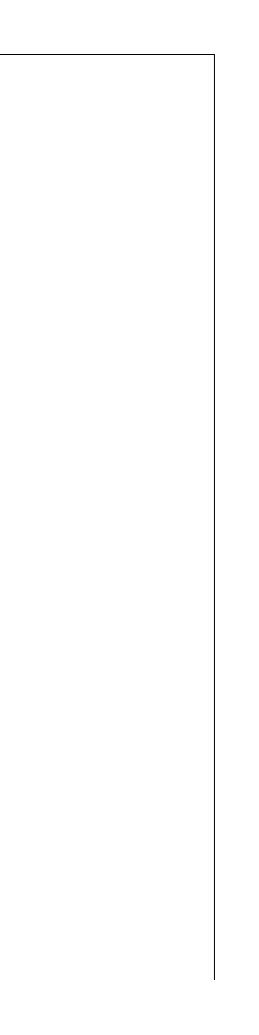
• Flooding – With regard to the Draft Welsh Government Flood Map for Planning, intended to replace the existing NRW Development Advice Maps, а proportionately small extent of the site along the north of A4106 at the confluent with Zig Zag Lane lies within an area at high and medium risk (Zones 3 and 2) from a Surface Water and Small Watercourses perspective and likewise high risk high and medium risk (Zones 3 and 2) from Rivers and Sea flood risk perspective. This area lends itself to the provision of Sustainable Urban Drainage and public open space and would positively integrate into the green and blue infrastructure strategy for the site. No residential development, nor vehicular access would occupy this land within any future masterplan approach.

• Landscape – With regard to landscape designations, there are no international or national designations relating to the site or adjacent to it.

• Ground Conditions – In view of the greenfield nature of the candidate site, there are no insurmountable concerns regarding ground conditions influencing the delivery of residential dwellings on the site.

Masterplan Deliverability Considerations

• Highways / access – In view of the high levels of visibility along the A4106, new and



<ul> <li>existing primary access can be taken via the A4106 (via the existing roundabout on Tyn-Y-Caeau Lane and via the existing priority junction to the west) and a potential secondary access from Marlpit Lane.</li> <li>On-site Physical Constraints – In view of the greenfield nature of the land, field boundaries will be utilised. There are no other physical constraints such as utilities and services which would preclude or hinder residential development.</li> <li>New Homes – Applying a density of 40 dwellings per hectare to the c.11.24 ha development area, the site could deliver up to 443 market and affordable homes.</li> <li>On-site Education Provision – The site can provide land for a two form entry primary school with associated sports pitch and play space can be provided on-site.</li> <li>On-site community facilities – The site could accommodate a mixed use local centre, providing small scale units suitable for local shops and services, within easy walking distance of the new homes. The concept masterplan is re-attached at Attachment B for reference.</li> </ul>		
Persimmon Homes West Wales object to the designation of Manor Farm Fields (forming part of the wider Zig Zag Lane allocation) as a Site of Importance for Nature Conservation (SINC) on the Deposit Plan Proposals Map. It is noted that Appendix 2 of the Bridgend SINC Survey (South and West Wales Wildlife Trust, March 2020) states: "The site appears to qualify as a SINC as curlew are reportedly still using the fields. The fields themselves appeared to be grazed and improved. Small area of woodland, hedgerows and stone walls are still present". The assessment report within the SINC Survey Report is deemed to be extremely light touch and it is not considered that the proposed SINC designated is based representative and robust survey data throughout the survey seasons, having only been undertaken	designation for Manor Farm Fields, Porthcawl	As stated within proposed development management policy DNP5, development we must be compatible with the nature conservation or scientific interest of the an educational role. Developments which would have an adverse impact on these sites the benefits associated with the development can be demonstrated to outweigh the be reduced or removed by appropriate mitigation and/or compensation measures. Contrary to the representor's statement, Manor Farm Fields is an existing SINC designation and/or compensation measures. Contrary to the representor's statement, Manor Farm Fields is an existing SINC design and/or compensation measures. Due to the frequency at which these local designations approtection afforded by proposed criteria-based policy DNP5, it is not considered approace on the Proposals Map itself and these designations are changed.

t within or adjacent to a SINC area, whilst promoting their es will not be permitted unless the harm and/or the harm can

designation. Whilst the Deposit bach was inconsistent with the s are reviewed, and also the appropriate to identify SINCs ensure help 'future proof' the between the months of October to March (2019- 20). It is considered that further surveys and a re-assessment should be undertaken by a third-party ecologist to allow verification as to whether the proposed designation is based on robust and credible evidence. As this has not been undertaken to date, it is considered the site should not be designated as a SINC in the Deposit Plan, as it cannot be demonstrated to meet the tests of soundness (in particular Test 2).

## Candidate Site Assessment

The Bridgend Candidate Sites Assessment Report (2021) sets out the Council's rationale behind not progressing the beyond Stage 2 of the candidate sites process and therefore not allocating the site for residential development within the Deposit Plan. It states: "As defined by Strategic Policy 1, Regeneration and Sustainable Development in the County Borough will be focused in the following areas:

- Bridgend Sustainable Growth Area

- Pencoed Sustainable Growth Area

- Pyle, Kenfig Hill and Norther Cornelly Sustainable Growth Area
- Maesteg and Llynfi Valley Regeneration Growth Area

- Porthcawl Regeneration Growth Area

The Candidate Site is located outside the settlement of Porthcawl which is identified as a Regeneration Growth Area (as defined by SP1). Brownfield sites will primarily provide the required capacity to accommodate growth within Regeneration Growth Areas. The site represents a large scale Greenfield extension to the existing settlement of Porthcawl that would undermine the Preferred Strategy. Therefore it is considered to represent an unacceptable incursion into the open countryside, as such this site will not be assessed as part of Stage 2". It is maintained by Persimmon Homes West Wales that the housing strategy for Porthcawl being regeneration-led only – by virtue of the allocation of the Porthcawl

Object to the regeneration-led only strategy for Porthcawl as reliance on Porthcawl Waterfront is 'exceptionally high risk' and there are no fall-back options to allow for additional housing provision in Porthcawl

The Spatial Strategy is clearly justified in the Spatial Strategy Options Background Paper. The total housing provision, and spatial distribution thereof, has been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting.

Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subject to robust re-assessment of its sustainability, deliverability and viability credentials in the same manner as all other candidate sites. There has been a substantial change in circumstances to demonstrate the site can be delivered over the Replacement LDP period, as indicated within the housing trajectory. The Council has now purchased and has total control over Phase 1 (Salt Lake), coastal defence works are progressing on site and are due to be completed by the end of 2022. Partnership options are currently being explored in order to bring forward development, initial work has commenced in relation to procurement mechanisms and a formal procurement exercise is scheduled to commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted by the Council and a private owner and a significant majority of the site is not reliant on coastal defence works to come forward. A land-owners agreement is in place, a disposal strategy is being finalised and the site is likely to be brought to the market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no reason why both phases will be unable to progress and come forward together, as further evidenced by the extensive supporting deliverability evidence. As such, the proposed change to the Strategy for Porthcawl is both unsubstantiated and not supported.

Waterfront strategic site for 1,115 homes under Policy SP2(2) / PLA 1 is deemed to be fundamentally flawed. This position is set out in detail within our earlier Preferred Strategy Representations submitted in respect of Zig Zag Lane provided at Attachment A for ease of reference. It is recognised that the Bridgend Housing Trajectory Background Paper 4 (2021) states: "In terms of Porthcawl Waterfront, the Council has now purchased and has total control over Phase 1 (Salt Lake), coastal defence works are progressing on site and are due to be completed by the end of 2022. Partnership options are currently being explored in order to bring forward development, initial work has commenced in relation to procurement mechanisms and a formal procurement exercise is scheduled to commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted by the Council and a private owner and a significant majority of the site is not reliant on coastal defence works to come forward. A land-owners agreement is in place, a disposal strategy is being finalised and the site is likely to be brought to the market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no reason why both phases will be unable to progress and come forward together, as further evidenced by the extensive supporting deliverability evidence" (paragraph 6.2.1) PPW 11 paragraph 4.1.18 however makes clear that: "Housing led regeneration sites can sometimes be difficult to deliver, making timescales for development hard to specify. Where deliverability is considered to be an issue, planning authorities should consider excluding such sites from their housing supply so that achieving their development plan housing requirement is not dependent on their delivery". Whilst the delivery of homes at the Porthcawl Waterfront site at some stage in the future is not disputed, the lack of any buffer / fallback options to allow for additional housing provision in Porthcawl to come forward if the waterfront site does not progress as per the trajectory (i.e. from 2024/25) is

exceptionally high risk and renders the Plan 'unsound'. If there were indeed no barriers to delivery on the Porthcawl Waterfront site, the planning application/s to deliver new homes on these sites would have realistically been made by now. Although the Council might consider the proposed higher flexibility rate of 20% may form a partial remedy for this issue, it is not deemed to form a positive approach to Plan preparation to rely on this as a contingency for the Porthcawl situation and the County Borough should be allocating sites which are realistically considered to deliver homes in the specified timeframes set out in the trajectory. The initial delivery year of 2024/25 is felt to be extremely over optimistic for the reasons set out in the overarching representations regarding realism of the proposed delivery timeframes.

Allocate Land at

Zig Zag Lane,

Porthcawl

(candidate site

ref: 221.C2) and

object to the

'over-reliance' on

the Porthcawl

Regeneration

Growth Area for

the delivery of

homes in

Porthcawl.

### Summary

In the context of the uncertainties surrounding the delivery of the Porthcawl Waterfront allocation, it is considered that the allocation of land at Zig Zag Lane would provide a viable and deliverable residential allocation. The Zig Zag Lane candidate site is capable of achieving key PPW 11 Placemaking objectives, within a highly sustainable location on the edge of the existing settlement which offers a capacity of services, facilities and employment appropriate to level of residential development proposed (i.e. 443 units). In view of the above, we encourage the County Borough to revisit their overarching housing strategy for Porthcawl and allocate the candidate site for residential development within the Deposit Plan Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1. This is required to ensure compliance with the tests of soundness and that the Plan can demonstrate a logical and reasonable approach has been taken in terms of housing delivery.

As stated in the Candidate Site Assessment, "The Candidate Site [Zig Zag Lane, Porthcawl] is located outside the settlement of Porthcawl which is identified as a Regeneration Growth Area (as defined by SP1). Brownfield sites will primarily provide the required capacity to accommodate growth within Regeneration Growth Areas. The site represents a large scale Greenfield extension to the existing settlement of Porthcawl that would undermine the Preferred Strategy. Therefore it is considered to represent an unacceptable incursion into the open countryside, as such this site will not be assessed as part of Stage 2".

Notwithstanding the representor's comments, the proposal to allocate Land at Zig Zag Lane, Porthcawl is out of accord with the Replacement LDP's Spatial Strategy as the site is outside of the Porthcawl Regeneration Growth Area. The proposal is therefore not supported.

The Spatial Strategy is clearly justified in the Spatial Strategy Options Background Paper. The total housing provision, and spatial distribution thereof, has been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting.

Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subject to robust re-assessment of its sustainability, deliverability and viability credentials in the same manner as all other candidate sites. There has been a substantial change in circumstances to demonstrate the site can be delivered over the Replacement LDP period, as indicated within the housing trajectory. The Council has now purchased and has total control over Phase 1 (Salt Lake), coastal defence works are progressing on site and are due to be completed by the end of 2022. Partnership options are currently being explored in order to bring forward development, initial work has commenced in relation to procurement mechanisms and a formal procurement exercise is scheduled to commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted by the Council and a private

in the relevant timescales and allow for appropriate contingency provisions).	
38         Support         None         Comments noted.           304         Support         None         Comments noted.	
394       Support       None       Comments noted.         345       Land to the North & East of Cypress       Allocate or extend       No action is considered necessary. The Replacement	I DP apportions sustainable a
<b><u>Gardens, Newton, Porthcawl, CF36 5BZ</u> the settlement that already benefit from significant services, facilities a</b>	
(Site Reference: 345.C1) boundary to bound	
include Land to a sustainable settlement hierarchy. Based upon the	
We are writing to you on behalf of our client, the North & East sustainable growth is proposed to be appropriately di	•
Tythegston Millennium Trust, in respect of of Cypress Pencoed and with the grouped Settlement of 'Pyle, Ket	nfig Hill and North Cornelly'.
the current consultation exercise being Gardens, Newton,	
carried out by Bridgend County Borough Porthcawl As detailed within the Spatial Options Background Pa	
Council (BCBC) on the Replacement (Candidate Site: land use framework that helps realise the regeneration	
Bridgend Deposit Local Development Plan 345.C1) as the need to deliver future housing requirements up to	
(2018 – 2033). Accordingly, this the site within or on the periphery of sustainable urban areas representation is made in respect of the represents a continues to focus on the delivery of the brownfield rege	
representation is made in respect of the represents a vacant scrubland located to the north and logical and logica	
east of Cypress Gardens in Newton. The proportionate Regeneration Growth Areas. The ongoing commitme	•
extent of the site is shown on the site 'minor' extension settlements accords with the site-search sequence of	
location plan (enclosed at Appendix I). This to this key developmental pressure on Best and Most Versatile (BI	
same site was promoted for residential settlement before Sustainable Growth Areas within SP1 to clearly	utlined in Planning Policy Wal
purposes as part of the call of candidate adopted LDP. The undeveloped brownfield regeneration	utlined in Planning Policy Wal MV) agricultural land. Regenerary y highlight a necessary degree
sites consultation exercise that was carried to be retained and supplemented with sustainable	utlined in Planning Policy Wal MV) agricultural land. Regenerary y highlight a necessary degree ion allocations identified in the

rks to come forward. A landis likely to be brought to the reason why both phases will nsive supporting deliverability ostantiated and not supported.

e growth towards settlements es and are most conducive to been undertaken to establish ehensive range of variables ents of Bridgend, Porthcawl,

eeks to continue to provide a the Council, whilst balancing ses the development of land leveloped brownfield sites. It ed in the existing LDP, hence, s through their designation as ant opportunities within these Vales and seeks to minimise heration Growth Areas appear ree of continuity with the first he existing LDP are proposed hts that demonstrate strong

aut hu DODO in Navanh an 0040 ta infama	analyze and transmission to the functions. This encourt is according to
out by BCBC in November 2018 to inform	employment, service and transportation functions. This approach is essential to
the preparation of the Replacement	regeneration strategy embodied within the Replacement LDP Vision.
Bridgend Local Development Plan. The site	Barthaoud is apositically identified as a Regeneration Crowth Area (as defined by
was given reference number 345.C1.	Porthcawl is specifically identified as a Regeneration Growth Area (as defined by capacity to accommodate growth in a sustainable manner, primarily via the significant
Site Context	opportunity within it's environ. The Growth Area demonstrates high potential to attract re
The subject site extends to approximately	investment that will address a broad range of socio-economic issues and comp
1.36 hectares and is situated to the north	regeneration initiatives.
and east of Cypress Gardens, which is	
located in Newton, on the eastern side of	Informed by the Sustainability Appraisal Report, the Candidate Site Assessment put
Porthcawl. The site comprises unused land	Deposit Plan confirms and provides reasoned justification for the outcome of the site se
that is well suited for residential	of each candidate site. Before being 'rolled forward' into the Deposit Plan, Porthcawl
development, immediately bounding	robust re-assessment of its sustainability, deliverability and viability credentials in the
Cypress Gardens to the south and a public	candidate sites. There has been a substantial change in circumstances to demonstrate
right of way to the north, beyond which is a	over the Replacement LDP period, as indicated within the housing trajectory. The Co
belt of vegetation and tree cover that	and has total control over Phase 1 (Salt Lake), coastal defence works are progressing
screens the properties fronting Lime Tree	completed by the end of 2022. Partnership options are currently being explored
Way. To the east is open land that extends	development, initial work has commenced in relation to procurement mechanisms a
along the coastline towards Candleston	exercise is scheduled to commence shortly. Phase 2 (Sandy Bay / Coney Beach) is
Castle. The surrounding area is	the Council and a private owner and a significant majority of the site is not reliant on
predominantly residential in character and	come forward. A land-owners agreement is in place, a disposal strategy is being finalis
form, largely consisting of detached	be brought to the market shortly. With Phase 1 and Phase 2 now running in parallel, the
dwellings benefitting from front and rear	both phases will be unable to progress and come forward together, as further evi
gardens, with respective driveways	supporting deliverability evidence.
accessed from cul-de-sacs served by the	The total beveing provision and enotial distribution thereof has also been subject
main estate roads.	The total housing provision, and spatial distribution thereof, has also been subject
The site is surrounded on three sides by the	analysis to enable development of the housing trajectory. The trajectory was prepa
The site is surrounded on three sides by the	dialogue with the respective site-promoters, followed by effective collaboration and in
settlement boundary and within close	stakeholders at a Stakeholder Group Meeting. As documented within the Housing Traj
proximity to Porthcawl, which is defined by	there were no outstanding matters of disagreement on the completion figures or the ti
the adopted Local Development Plan as a	in the plan period (including those sites with planning permission and new hous
Strategic Regeneration Growth Area	conclusion of the Stakeholder Group Meeting.
(SRGA). It is not within open countryside	In relation to Land to the North and East of Oversee Cardena, Newton, Dortheouvlithe C
and is close to an established settlement;	In relation to Land to the North and East of Cypress Gardens, Newton, Porthcawl the C
being on the urban fringe, opposite existing and proposed dwellings, served by existing	clearly states,
infrastructure associated with the	"The Candidate Site is located outside the settlement of Porthcawl which is ider
	Growth Area (as defined by SP1). Brownfield sites will primarily provide the required
surrounding housing development and can	growth within Regeneration Growth Areas. The site represents a Greenfield of
be integrated easily into the neighbouring built-up area.	settlement of Porthcawl that would undermine the Preferred Strategy. Therefore it i
שמות-עף מוכמ.	an unacceptable incursion into the open countryside. Furthermore, the Sustainability
Summary of Candidate Site Representation	(Site of Special Scientific Interest)' as a constraint that would prevent development
The representation prepared for this site	identified constraint is located on the periphery of the site and would require furth
and submitted at the candidate sites stage	the site is out of accord with the preferred strategy and as such will not be assessed
was accompanied by details of the site, its	
	Notwithstanding the representar's commenter the proposal to allocate L and to the N
planning history, an indicative site layout	Notwithstanding the representor's comments, the proposal to allocate Land to the N Gardens, Newton, Porthcawl is out of accord with the Replacement LDP's Spatial Stra
plan, an Ecological Appraisal and the	of the Porthcawl Regeneration Growth Area. The proposal is therefore not supported.
rationale for including the site as a residential allocation. This information was	
presented in a statement (dated 8th	
presented in a statement (dated oth)	

# to implement the long term

by SP1) as it demonstrates ant brownfield redevelopment ct regeneration-based inward mplement community-based

published to accompany the e selection process in respect wl Waterfront was subject to he same manner as all other rate the site can be delivered Council has now purchased ing on site and are due to be ed in order to bring forward s and a formal procurement is being jointly promoted by on coastal defence works to alised and the site is likely to alised and the site is likely to be and the site is likely to be a site and an extensive

bject to site-specific phasing epared initially through close d involvement with a range of rajectory Background Paper, e timing and phasing of sites busing allocations) following

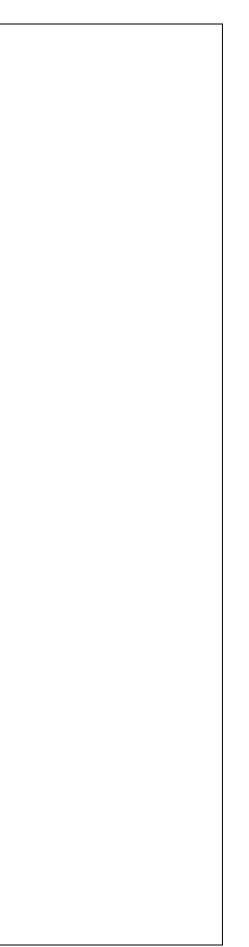
e Candidate Site Assessment

dentified as a Regeneration red capacity to accommodate d extension to the existing it is considered to represent ility Appraisal identifies 'SSSI ent from coming forward. The inther assessment. However, sed as part of Stage 2."

e North and East of Cypress Strategy as the site is outside ed.

November 2018). To avoid repetition, we A Settlement Boundary Review (2021) was also published alongside the Deposit Plan consultation documents. will not reiterate the content of our previous This study provides the background and justification for the review of the settlement development boundaries representation in this letter report and, through the Replacement Local Development Plan (2018-2033). It includes a list of matters that have been instead, include a copy of the considered when determining if and how an existing settlement boundary should be changed. It also includes representation at Appendix II. However, to maps and tables for the County Borough of Bridgend illustrating the proposed changes and explaining the summarise, the subject site represents a reasons for them. This Study did not propose any changes to the existing settelement boundary of Porthcawl. logical and proportionate 'minor' extension As detailed within the Review. to this key settlement, particularly given that the land to the south, north and west already "Porthcawl is defined as an area of growth – but which can predominantly be served within the existing fall within the settlement boundary and are settlement boundary. A more flexible approach to defining settlement boundaries around these settlements developed. In addition, the site has would mean the inclusion of greenfield sites that could be 'cherry-picked' by developers and undermine the excellent accessibility to a variety of delivery of key regeneration sites within the settlements that are crucial for the success of the Plan". transport modes and there are plentiful key services in the immediate vicinity. A As such, the representor's proposal to extend the Porthcawl settlement boundary to include Land to the North planning application (LPA Reference and East of Cypress Gardens, Newton, Porthcawl, is not supported. P/20/729/OUT) for the residential development of 0.68 hectares of the candidate site area was submitted to BCBC in September 2020. This application has been submitted in outline form with all matters reserved for future consideration except for access. The application is supported by an indicative layout that demonstrates 20 no. dwellings can be suitably accommodated on the site, comprising a mixture of detached and terraced units. Access is proposed to be taken from Cypress Gardens via an extension of the existing turning head. The application is also supported by a suite of technical reports covering the applicable material planning considerations. For ease of reference, these reports are listed below: Topographical Site Survey Utilities Survey Preliminary Ecological Appraisal Landscape Character Visual Impact Assessment Tree Constraints Plan • Landscape Strategy Heritage Impact Assessment Phase 1 Ground Conditions Desk Study Pre-Development Tree Survey & Assessment Concept Drainage Layout Illustrative Site Layout Plan & Parameters Plan · Site access general arrangement and vertical alignment design (including swept path analysis)

<ul> <li>Transport Statement</li> <li>Travel Plan The outline planning application remains under consideration by the council.</li> </ul>	
The Draft Deposit RLDP	
Despite the site's location on the urban fringe, surrounded on three sides by the settlement boundary and existing dwellings, the land remains unallocated in the Draft Deposit LDP. For ease of reference, an extract from the Council's Draft Deposit LDP Proposals Map is included at Figure 1 below.	
Draft Policy COM1 (Housing Allocations) sets out the proposed housing allocations up to 2033. We note that the subject site has not been included as a residential allocation in the Draft Deposit Plan and, whilst this site could also constitute a large windfall site, the settlement boundary has not been altered (under the Settlement Boundary Review 2021) to include this land. We, therefore, contend that the subject site should be included within the list of sites identified by Draft Policy COM1 or, at the least, the settlement boundary should be extended and rounded off to include this land.	
BCBC's Candidate Site Assessment Report (2021) outlines the Council's findings of the candidate site assessment process as part of the preparation of the Replacement LDP. The register provides the following assessment of the subject site (RLDP Reference 345.C1).	
<ul> <li>"As defined by Strategic Policy 1, Regeneration and Sustainable Development in the County Borough will be focused in the following areas:</li> <li>Bridgend Sustainable Growth Area</li> <li>Pencoed Sustainable Growth Area</li> <li>Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area</li> <li>Maesteg and Llynfi Valley Regeneration Growth Area</li> </ul>	



 Porthcawl Regeneration Growth Area The Candidate Site is located outside the settlement of Porthcawl which is identified as a Regeneration Growth Area (as defined by SP1). Brownfield sites will primarily provide the required capacity to accommodate growth within Regeneration Growth Areas. The site represents a Greenfield extension to the existing settlement of Porthcawl that would undermine the Preferred Strategy. Therefore it is considered to represent an unacceptable incursion into the open countryside. Furthermore, the Sustainability Appraisal identifies 'SSSI (Site of Special Scientific Interest)' as a constraint that would prevent development from coming forward. The identified constraint is located on the periphery of the site and would require further assessment. However, the site is out of accord with the preferred strategy and as such will not be assessed as part of Stage 2." Porthcawl is defined as a Strategic Regeneration Growth Area (SRGA) in the adopted LDP. Whilst the Plan favours the development of brownfield site's where possible, local and national planning policy does not preclude the development of greenfield sites where they are located within and adjoining those settlements and where it can best be accommodated in terms of infrastructure, access, habitat and landscape conservation. Planning Policy Wales goes on to state that "infilling or minor extensions to existing settlements may be acceptable, in particular where they meet a local need for affordable housing or it can be demonstrated that the proposal will increase local economic activity." The subject site is located on the edge of the settlement boundary of Newton (surrounded by development on three sides) and would form a logical and proportionate 'minor' extension to this key settlement, particularly given that the land to the south, north and west already fall within the settlement boundary and are



developed. The site also has excellent accessibility to a variety of transport modes and there are plentiful key services in the immediate vicinity.

In terms of technical considerations, as part of the current planning application for the development of the site, it has been demonstrated that residential dwellings can be suitably accommodated without resulting in significant undue harm to features of acknowledged importance. We have summarised these technical matters below: • Landscape Character - A Landscape Character and Visual Impact Assessment (LCVIA) has been prepared by TDA to assess the general visual and landscape character impacts the proposed development will have upon the surrounding landscape. The LCVIA concludes the proposed development will create a defined barrier to avoid erosion into the Merthyr Mawr Warren and would be viewed in the context of existing development in the area. As such, the site can accommodate the proposed residential development without unacceptable landscape character or visual amenity impacts upon its immediate setting or the wider landscape. • Access – This is achievable from Cypress Gardens, which benefits from an existing turning head that abuts the site's southern boundary. The access road is designed as a continuation of Cypress Gardens, which becomes the main access spine road for the

becomes the main access spine road for the proposed site. The access road widths vary from 4.5m at the initial access upon entering the site, in keeping with the existing widths on Cypress Gardens, to 4.8m as it routes northeast into the site. This ensures a smooth transition from the existing road whilst offering some additional space within the site.

• Sustainability – The site occupies a sustainable location with good connectivity to a number and range of local facilities. There are good cycling links to nearby settlements and an extensive footpath network, including footway links to the



shops in Newton. The site is also within a short walk of bus stops on Lime Tree Way (circa 300m), with further services located on Bridgend Road. In general terms, the site has good access links to Porthcawl and the wider region.

• Foul Drainage – There is an existing public foul sewer located adjacent to the turning head of Cypress Gardens. It is proposed that the development could connect at this point. Dwr Cymru Welsh Water has confirmed capacity exists within the public sewerage network in order to receive the domestic foul only flows from the proposed development site and no problems are envisaged with the Waste Water Treatment Works for the treatment of domestic discharges from this site.

• Surface Water Drainage – Initial investigative work has been undertaken to determine how the surface water run-off from the proposed development could be managed. A concept strategy has been prepared based on the use of Sustainable Drainage Systems (SuDS) integrated with the landscape strategy. The SuDS strategy comprises a mixture of permeable paving, rain gardens and shallow infiltration, with swales provided behind the rear gardens of the properties to channel surface water into a dedicated infiltration and attenuation basin.

• Ecology – The site has no statutory ecological designation and comprises a small part of a coastal dune system that is regularly managed by annual cutting, as acknowledged by the Preliminary Ecological Assessment (PEA) undertaken by Pryce Consultant Ecologists in February 2020. The coastal zone (Merthyr Mawr Warren) to the south and east is designated as a Site of Special Scientific Interest (SSSI), a Special Area of Conservation (SAC) and a Site of Importance for Nature Conservation (SINC), although the site does not form part of these designations. BCBC's Candidate Site Assessment Report identifies the SSSI as a constraint that would prevent development from coming forward. The Ecological Assessment



concludes that the development of the site is not likely to pose a direct impact on the adjacent statutory ecological designations and is either not suitable to support or there was no evidence of European or UK protected species. Whilst there will be a loss of a vegetation buffer with the SSSI, this will be marginal. The Ecological Assessment concludes that, provided the corridor of semi-mature trees and scrub is maintained along the northern boundary as a habitat corridor, potential features of acknowledged ecological importance will be suitably safeguarded.

• Trees – There are 5 no. individual trees (T6, T7, T11, T12 & T13) and a group of young Hawthorn, Blackthorn and Bramble on the site. These trees are deemed to fall within Category C (i.e. low quality and value) and are proposed to be removed. There is plentiful space for the provision of replacement tree planting within the common areas or in frontage locations. Further details of this are provided in the Landscape Strategy that supports the planning application.

## Summary

This representation has been made by Avison Young, on behalf of Tythegston Millennium Trust, in response to the consultation exercise for Bridgend's Deposit Draft Replacement Local Development Plan. In summary, the evidence prepared and submitted for the residential allocation of the subject site and/or the extension of the settlement boundary and in support of the planning application for the residential development of a slightly smaller portion of that same site demonstrates the efficient use of this vacant scrubland that could deliver a sustainable form of development, representing a logical extension of (or rounding off of) an established and well served key settlement and could deliver economic, social and a range of community benefits. These considerations provide clear and material justification for the site's allocation in the RLDP for residential



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	development, which will provide a sustainable, realistic and deliverable opportunity to provide much-needed new homes in Bridgend and will contribute to the County Borough's shortfall in housing supply.		
	It is on this basis, we respectfully request the identified land is allocated for residential purposes in the RLDP and/or the settlement boundary is extended to include this land.		
425		Objection SP2(1): overreliance of the Porthcawl Waterfront Site to deliver the plans housing requirement.	The total housing provision, and spatial distribution thereof, has been subject to site- enable development of the housing trajectory. The trajectory was prepared initially the the respective site-promoters, followed by effective collaboration and involvement with at a Stakeholder Group Meeting. As documented within the Housing Trajectory Bac ino outstanding matters of disagreement on the completion figures or the timing and period (including those sites with planning permission and new housing allocations) Stakeholder Group Meeting. Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subjec of its sustainability, deliverability and viability credentials in the same manner as all o has been a substantial change in circumstances to demonstrate the site can be delive LDP period, as indicated within the housing trajectory. The Council has now purch over Phase 1 (Salt Lake), coastal defence works are progressing on site and are d end of 2022. Partnership options are currently being explored in order to bring forwar has commenced in relation to procurement mechanisms and a formal procuremer commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted by owner and a significant majority of the site is not reliant on coastal defence works owners agreement is in place, a disposal strategy is being finalised and the site is market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no re be unable to progress and come forward together, as further evidenced by the extensi evidence. As such, the proposed change to Porthcawl Waterfront's trajectory is bot supported.

e-specific phasing analysis to y through close dialogue with with a range of stakeholders ackground Paper, there were nd phasing of sites in the plan is) following conclusion of the

bject to robust re-assessment Il other candidate sites. There livered over the Replacement rchased and has total control e due to be completed by the ward development, initial work nent exercise is scheduled to d by the Council and a private rks to come forward. A landis likely to be brought to the o reason why both phases will insive supporting deliverability both unsubstantiated and not the site and can do so within the timeframe of the plan. This links directly to the test of soundness, 'Will the plan deliver?'... For the purposes of this Manual ensuring sites in plans are deliverable means both in terms of deliverability and financial viability." We are not aware that any further detail on the site's deliverability has been produced since the Preferred Strategy stage and have serious concerns in respect of the realism of the Housing Trajectory set out in Appendix 1 which indicates that the first 60 homes will be completed in 2024-2025. It is assumed that this is reliant on the Council's Compulsory Purchase Order of the land, a as set out in their report to Cabinet on 20th Julv: The current target for the completion of the

scheme is the late 2020's, with the Council seeking to achieve acquisition of the land to be acquired by early 2023 at latest. It is planned to identify the preferred developer or developers, depending upon whether a single or multiple developers are chosen via open marketing of the first phase of the site in early - mid 2022. The aim is to secure the requisite planning consents for the first phase by late 2023. (paragraph 4.12, Report Item 8, Cabinet - Tuesday, 20th July, 2021)"

As set out within the Welsh Government's Compulsory Purchase Order (CPO) Manual, there are a number of external factors which can delay the CPO process. However, even if the above CPO programme was achieved, the Council's assumptions for delivery of homes on the site are not considered realistic or achievable.

Notwithstanding the above, the site has been a longstanding allocation – being positively allocated in the existing LDP and in its predecessor the 2005 UDP (some 16 years ago). The failure of the site's delivery was a major contributor to the housing land supply shortage experienced by the County Borough. The reasons for its failure have been documented by others extensively. Reallocating the site (and relying on it for the Plan's housing land supply) would



seriously bring into question the soundness of the plan. The site should accordingly be identified as a Long-term Regeneration Site (not counted as part of immediate housing land supply) given its regeneration function and the concerns associated with its delivery.				
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ID	Comment	Summary of	Council response
U	Comment	changes being	Council response
		sought/proposed	
82	No comments	No changes	Comments noted.
		proposed	
516	"Promotion of tourism hubs in the Garw" - waste of time and money. "Improved public transport" - bring back the railway line to Bridgend. "Create sustainable communities linked to wider opportunities" - what does this even mean? "Improved walking and cycling routes" - no need, they are good enough as is. "Opportunities for co-operative housing, self-build and custom build alongside other forms of development" - we need more flexibility for people to build homes outside the restrictive zoning currently in place.	Bring back railway line to Bridgend. Need more flexibility for people to build homes outside the restrictive zoning currently in place	The Ogmore and Garw Valleys are identified as Local Settlements. Therefore, whe earmarked to accommodate significant growth, the Replacement LDP seeks to creat linked to wider opportunities in a manner that protects their high quality environ alternative forms of development would help deliver smaller-scale growth, such operative housing, self-build and custom build opportunities alongside other for community investment opportunities will enable development of a scale and nature to needs, whilst diversifying and strengthening the local economies, connecting commu- and protecting the high-quality environments. An Urban Capacity Study (UCS) (See Appendix 39) has been prepared of which potential urban capacity of the County Borough's settlements for housing to evider
707	Don't know the area	No changes	windfall site allowance rate. The UCS identifies more than sufficient capacity with boundaries to accommodate such housing. It serves as a useful resource to deve identify potential development opportunities not specifically allocated in the Replace Comments noted.
		proposed	
847	No	No changes proposed	Comments noted.
996	No	No changes proposed	Comments noted.
329	my site particular meets PPG and there is scope for expansion on the ldp to include this	Include site in Nantymoel	Comments noted. All Candidate Sites were subject to a detailed assessment to conformed with the Preferred Strategy and, if so, whether they were deliverable. Site hectares (including 329.C1) are too small for individual allocation and were there Settlement Boundary Review (See Appendix 38). The Council has reviewed all settle County Borough to determine if they are still appropriate in light of the Replacement I constitute appropriate amendments to existing boundaries. This included candidate s Terrace, Nantymoel). As detailed within the Review, the Replacement LDP Strategy as a location for strategic growth. Candidate site 329.C1 was considered to represen- to the existing settlement of Nantymoel into the open countryside. Therefore, follow Replacement LDP has not proposed altering the defined settlement boundary of Na
254	No specific comments to make.	No changes	Comments noted

idgend.

whilst these areas will not be eate sustainable communities onment. It is recognised that ch as (but not limited to) coforms of development. Such e that is tailored to community munities to wider opportunities

hich provides analysis of the dence the expected small and ithin the proposed settlement evelopers who are seeking to icement LDP.

t to determine whether they Sites measuring less than 0.25 erefore assessed through the ttlement boundaries within the nt LDP Strategy and / or would e site 329.C1 (rear of Osborne gy does not identify Nantymoel ent an inappropriate extension owing the Review, the Deposit Nantymoel to include this site.

287	Support - please see covering letter submitted	No changes proposed - support	Comments noted
38	Support	None	Comments noted.
394	Support	None	Comments noted.
407	N/A	No changes	Comments noted.
		proposed	

Title:	Do you have any comments to make on the ke	y proposals? Bridger	nd and Pencoed
ID	Comment	Summary of changes being sought/proposed	Council response
82	Land West of Bridgend – BDW has concerns over the proposed allocation of this strategic site. The LPA considers the site is accessible to public transport allowing for connectivity to the town centre and is in a sustainable location on the periphery of Bridgend. The LPA further considers that there are no environmental or deliverability constraints, however, we strongly disagree. It includes a SINC and contains a Schedule Ancient Monument (SAM) and there is an overhead line crossing the northern part of the site with pylons and parts of the site are very steep. Any proposals for this site would therefore need to have due regard to these constraints. The whole of the southern part of the site, which is the area proposed for residential development, is located within a Green Wedge designated under the existing LDP (Policy ENV (4), the purpose of which is to prevent the coalescence of Bridgend and Laleston. The existing LDP designates Green Wedges to protect vulnerable areas of countryside from development and between settlements which are already close enough where distance alone makes them vulnerable to coalescence. Proposed Policy PLA3 states that a strategic green corridor between the site and Laleston will be maintained to retain the separate identities and character of these settlements whilst preventing coalescence, however the development of this area of open countryside for housing would significantly reduce the openness between the two settlements to a point	De-allocate Land West of Bridgend	As documented in the Candidate Site Assessment, the Land West of Bridgend demonstrated delivery in accordance with the requirements set out in the Developm plethora of evidence has been provided to the Council to support its delive investigations and appraisals, masterplans, a viability assessment, a trans consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary communities. The related housing trajectory was prepared initially through close site-promoters, followed by effective collaboration and involvement with a range of s Group Meeting. As such, the proposal to remove Land West of Bridgend from the D

end site promoter has robustly opment Plans Manual. A detailed ivery, including numerous site ansport assessment and due has provided a high degree of ora of associated development ry to deliver high-quality new se dialogue with the respective of stakeholders at a Stakeholder e Deposit Plan is not supported.

where they would be vulnerable to coalescence. For this reason, this site is not considered appropriate for the scale of development proposed.		
Parc Afon Ewenni, Bridgend – BDW is concerned that there is no confirmation that an end user is in place in the form of a residential developer to deliver the quantum of development proposed within the Plan period. It comprises an historic allocation within the adopted LDP which is proposed to be 'rolled' forward by Bridgend CBC. The site has not delivered in the current LDP plan period and BDW stress that the delivery and viability of this site needs to be carefully considered (in light of this poor track record). The central part of this site has outline consent, granted in March 2018, for approximately 240 units. However, the viability of this consent is questionable due to the level of contamination at the site and landowner expectation on value. For the other two parcels of land which make up this site the land ownership issues have been resolved so they are now wholly within the ownership of South Wales Police and Bridgend CBC. As for the remainder of the site, it is acknowledged that the previously developed nature of the site and the need to provide highway works and education facilities to strengthen the sustainability credentials of this isolated site present viability issues that will need to be addressed. The deliverability of the wider site is therefore questionable. The Council estimate in the trajectory that residential completions will start coming forward on this site by 2024 which is considered to be very ambitious. The Site is also crossed by one of National Grid's high voltage overhead electricity transmission lines which will need to be retained in-situ. The development of the site would need to take into account this constraint.	housing trajectory for Parc Afon Ewenni, Bridgend	In terms of Parc Afon Ewenni, the Council has now removed the site from the housir and subsequent uncertainty relating to delivery timescales. The Candidate Site As been updated to reflect this constraint, of which states that 'the site is located within Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The allocation from the existing LDP (REG1(6)) and is proposed to be developed for uses. However, the Council's Strategic Flood Consequences Assessment identifier vulnerable to flood risk. As such, the site will not therefore be allocated for devel LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewenni due to t timescales as a result of flood risk. Nevertheless, an appropriate flexibility allowance (10%) has been embedded into th for which is clearly set out in the Housing Trajectory Background Paper. The flexibil fact that there may be certain specific circumstances, unknown at the plan making s of sites, notwithstanding the robust frontloading of site delivery evidence. This is chosen specifically to enable the Replacement LDP's housing requirement to rema the event that a strategic site fails to come forward as anticipated at this point of p flexibility allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable even if a significant unforeseen scenario, such as non-delivery of a strategic site, sl
Land East of Pencoed – This site is located to the north of Junction 35 of the M4. There		As documented in the Candidate Site Assessment, the Land East of Pencoed demonstrated delivery in accordance with the requirements set out in the Development

sing trajectory due to flood risk Assessment (2022) report has hin the settlement boundary of The site represents a 'Rollover' for commercial and residential fies that the site is significantly velopment in the Replacement of the uncertainty over delivery

the Deposit Plan and the basis bility allowance recognises the g stage, that delay the delivery is a large flexibility allowance, nain comfortably deliverable in f plan preparation. With a 10% able throughout the plan period , should occur.

ed site promoter has robustly ment Plans Manual. A detailed

	are a number of concerns in bringing this site forward for residential development including the provision of pedestrian connectivity routes, flood risk and ecological constraints associated with the adjacent SSSI. Proposed Policy PLA4 notes that the presence of dormice and/or GCN is likely to affect the area available for development. Furthermore, a high-pressure gas main runs north to south across the site. Due to the high-pressure nature of the pipeline it is considered a hazard and there are also development exclusion zones associated with the pipeline. This is a constraint to development on a large part of the site as it limits the developable area. There are also land ownership issues associated with the 2.1ha 3G football pitch within the site which is identified on the proposed masterplan as a potential location for the required new primary school. Although within the extent of the site, this land falls outside of the ownership of the promoter. Its delivery is therefore uncertain although it is a key requirement of this strategic allocation These issues should be taken into account when assessing the viability and deliverability of the site. The Council estimate in the trajectory that residential completions will start coming forward on this site by 2023 which is considered to be very optimistic.		plethora of evidence has been provided to the Council to support its delive investigations and appraisals, masterplans, a viability assessment, a trans consideration of \$106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary communities. The related housing trajectory was prepared initially through close site-promoters, followed by effective collaboration and involvement with a range of s Group Meeting. As such, the proposal to delay the site housing trajectory is not su
1366	<b>Bridgend Land West of</b> As previously outlined, Llanmoor support the allocation of Land West of Bridgend as set out in Policy SP1: Regeneration and Sustainable Growth Strategy and Policy SP2: Regeneration Growth Areas, Sustainable Growth Area Strategic Allocations and more specifically place making Policy PLA3: Land West of Bridgend Sustainable Growth Area. The supporting reasons for the allocation are self-evident and are as follows: Bridgend is the Primary Key Settlement of the County Borough and as such is the most sustainable location for growth, which has been substantiated through extensive technical evidence produced as part of the	Continue to support the allocation of Land West of Bridgend for progression within the Replacement LDP.	Comments noted. All allocations have been proposed based on the outcome of the Candidate Site As with the National Sustainable Placemaking Outcomes, the Gateway Test applied and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. are considered to demonstrate delivery in accordance with the requirements set of Manual. All strategic sites key to the delivery of the plan have been subject to great support their delivery, including schematic frameworks, phasing details, key trans 10 requirements, design parameters, s106 requirements, infrastructure and costs. degree of confidence that the sites included within the Deposit Plan are realistically full plethora of associated development requirements, infrastructure provision necessary to deliver high-quality new communities.

ivery, including numerous site ansport assessment and due has provided a high degree of bra of associated development ry to deliver high-quality new se dialogue with the respective of stakeholders at a Stakeholder supported.

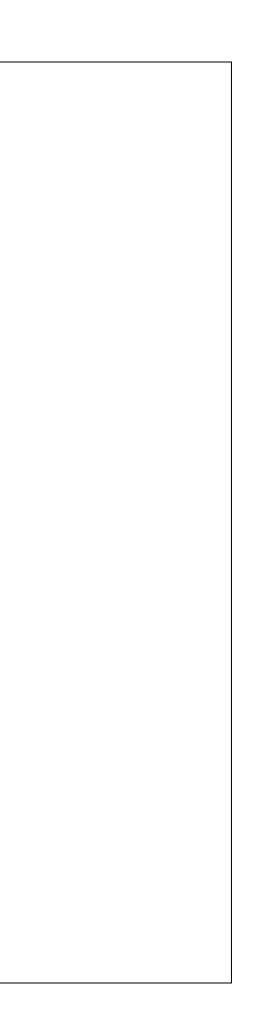
Assessment, their compatibility ed to the site search sequence s. All new proposed allocations t out in the Development Plans eater evidence requirements to nsport corridors, critical access s. This process provides a high ally deliverable, considering the on and placemaking principles evidence base supporting the emerging replacement Local Development Plan. Llanmoor have been engaged with the Local Plan process from the beginning promoting land to the West of Bridgend through the Council's Candidate Sites exercise. The site has been through a rigorous technical analysis and review at each stage of the emerging Plan in accordance with sustainable development and place making principles of Planning Policy Wales (PPW) Edition 11 and Development Plans Manual (DPM) Edition 3, March 2020.

The Candidate Sites and Sustainability Appraisal

The Candidate Sites and Sustainability Appraisal process are the building blocks to the plan making process required by Welsh Government. The evidence in both these documents clearly sets out why a site has been included or excluded from the LPD. In this context, the Land West of Bridgend was considered at both stages of the Candidate Site Assessment (Ref. 308.C1) as it is located on the periphery of Bridgend in an identified Sustainable Growth Area.

The Llanmoor consultants have submitted a large volume of technical studies to demonstrate the deliverability of the site. The site was initially assessed in the Sustainability Appraisal for the PS which has been updated at each stage of the plan making process to take account of additional submitted evidence. This ensures that a robust and consistent approach is taken to testing the sustainability of each site, an approach which is logical and supported by Llanmoor.

The Bridgend RLDP Deposit Plan Sustainability Appraisal undertaken by Stantec, May 2021 overall identifies that the land west of Bridgend will have greater likely significant beneficial effects than likely significant adverse effects. The two identified likely adverse effects are in relation to:-



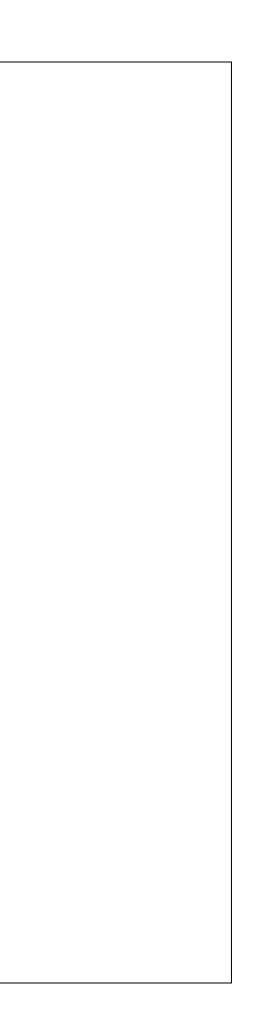
i.	SA3e Employment and Skills which
	requires demonstration of the
	accessibility of existing secondary
	education infrastructure to
	accommodate the development and,

ii. SA4b to demonstrate the level and acceptability of impacts on the surrounding road network.

In addressing (i), Llanmoor continue to engage with Bridgend County Borough Council Education Department to ensure proportional contributions to the funding of off-site secondary school provision is provided in accordance with the proposed number of residential units developed at the site. A Community Infrastructure sum of £12,665,330.00 has been included in the viability report, £11.35m is allocated for education purposes, including across nursery, primary, secondary and further.

In terms of (ii), a Transport Assessment, and an Interim Travel Plan, have been produced by Vectos. Whilst it has not been possible to undertake the full survey works required, due to the current COVID lockdown, the assessment confirms that Parc Llangewydd, Land at West Bridgend is a well-located sustainable site taking advantage of the numerous nearby facilities, many of which are located a short distance away from the site within Bryntirion and Broadlands, with greater numbers also located within Bridgend Town Centre.

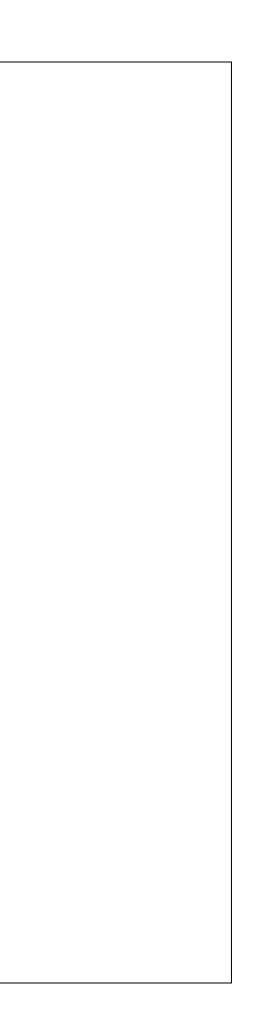
The emerging masterplan includes numerous points of public access including the Laleston Link through the site which forms part of the wider Bridgend Circular Walk Public Right of Way. The proposed masterplan retains the existing access points along the boundaries, includes provision for shared foot/cycle routes, an indicative informal path/nature trail to the north as well as a trim/play trail to the west thus maintaining active travel connections.



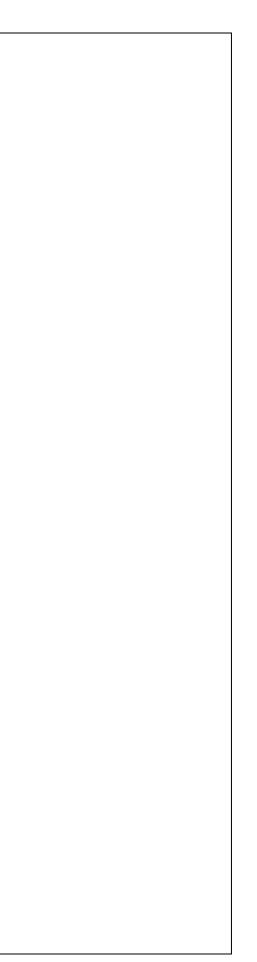
The site is also accessible via a number of modes of travel and links well to the existing urban boundary to the east. The assessment concludes that the development provides opportunities to create a new western edge to Bridgend in a self-sustaining site, offering community facilities suitable for day-to-day living. In this way the transport case for mobility provides the options necessary to promote sustainable travel modes before the private vehicle.

Llanmoor are aware of the operational capacity issues raised within Appendix 48 – Background Paper 8 – M4 Junction 36 and the delays being encountered to the undertaking of the Strategic Transport Assessment due to the ongoing COVID lockdowns. Llanmoor are committed to further assessment work being undertaken in due course, post COVID restrictions, to demonstrate the acceptability of impacts on the surrounding road network and that there is already sufficient infrastructure to support the proposed urban extension on Land West of Bridgend.

Llanmoor's consultants submitted Air Quality Assessments as prepared by AQC which confirmed that overall, the operational air quality effects of the proposed development are judged to be 'not significant'. Furthermore, it is AQC's professional judgement that significant impacts are considered unlikely along the A48, through Laleston, and at the proposed development site, due to low background and measured concentrations. Also following further assessment, it is considered that the actual impact of the development at 6-8 properties along Park Street, within the AQMA, will actually be negligible in all years from the first occupation in 2024, and that concentrations at these properties will be below the objective in those years. Impacts elsewhere were all negligible even in the worst-case 2022 scenario.



Set	tlement Assessment Study		
	part of the Settlement Assessment Study		
	lertaken in 2019 and revised in 2021,		
	dgend overall score is 79 when tested		
aga	inst three main principles including:		
	i. Sustainable transport and		
	accessibility to reduce the need		
	to travel by car,		
	ii. Availability of facilities and		
	<li>Availability of facilities and services to consider whether the</li>		
	current provision can support the		
	current and future population,		
	and		
i	iii. Employment provision to		
	measure the economic		
	sustainability of an area and		
	reduce commuting.		
	Igend is identified as the Primary Key		
	tlement within the County Borough		
	ch far exceeds any other settlement in		
	matrix and is therefore the primary focus		
	development in the hierarchy of		
seu	lements.		
1.00	al Housing Market Assessment		
	e Local Housing Market Assessment		
	1 has followed Welsh Government		
	dance to identify the annual level of		
	ising need across the Bridgend County		
	ough in numeric and spatial terms. The		
	M is a core baseline evidence document		
whic	ch influences the scale, type and		
	ation of growth within the Replacement		
LDF	P. The LHMA indicates that the headline		
	ising need equates to 5,134 affordable		
	Ising units from 2018-2033, comprising		
	39 social rented dwellings and 2,295		
	rmediate dwellings. Llanmoor recognise		
	need and are in a position to deliver		
	ch needed housing in a sustainable		
loca	ation within the County Borough.		
Viel	bility and Dolivorability		
	bility and Deliverability		
	nificant evidence has been provided by moor to demonstrate that the land west		
	Bridgend is deliverable and viable, a		
	Dhayena is deliverable and viable, a	1	

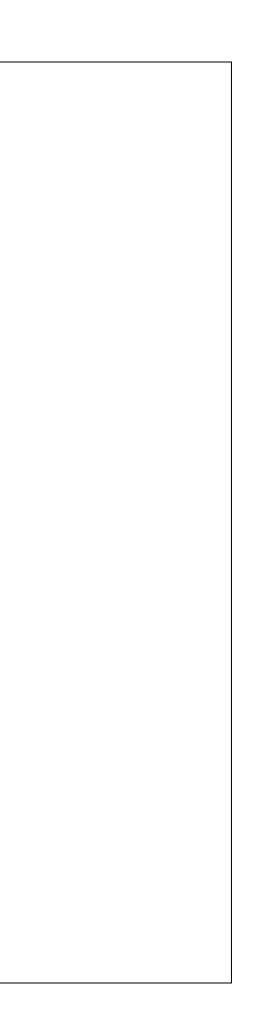


fundamental consideration in the development plan process and at the forefront of Welsh Government policy. Llanmoor has been actively engaged in the viability process, with evidence provided to the Council. This has been subject to rigorous examination by independent experts who have agreed that the site is sustainable, deliverable and recommended it for inclusion within the emerging LDP Review.

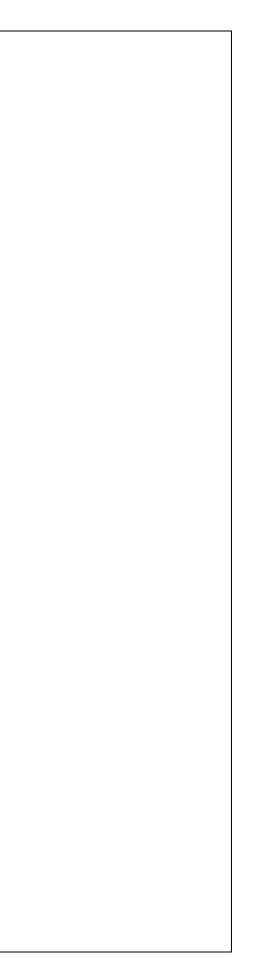
Llanmoor can confirm that a Formal Joint -Landowner Agreement has been legally exchanged and completed, dated 9th October 2020. As such, Llanmoor now has control over the whole of the land within the Allocation through individual landowner Option Agreements which allows the delivery of the site in a comprehensive manner. Furthermore, the Housing trajectory for the site set out in Appendix 1 of the DCD and Background Paper 4 Housing Trajectory, is agreed, and the total site capacity of 850 dwellings and the phased delivery of housing commencing in 2024-2025 can be delivered. Llanmoor further consider that the whole of the development will be completed by the end of the LDP period in 2033 with no anticipated overspill beyond the plan period.

## Settlement Boundary

As detailed within the Settlement Boundary Review 2021, appropriate boundary changes will have to be made to allow for the delivery of the LDP Strategy. In this case, the settlement boundary relating to Bridgend was considered flexibly and whilst Bridgend is defined as an area of growth it is constrained by the capacity of Junction 36 of the M4. This directly informs the location of sustainable growth within settlements, with a focus on those areas that can provide sustainable travel options and where increased traffic options will not add to the capacity issues of Junction 36. Llanmoor agree with the Councils own assessment that the settlement boundary is proposed to be altered to extend around the site to



reflect the emerging allocation, a position which strengthens Bridgend's role as the Primary Key Settlement within the County Borough. Furthermore, the revised settlement boundary will prohibit further greenfield development to the south north and west.	
Agricultural Land Quality Appendix 55- Background Paper 15 – The Best and Most Versatile Agricultural Land confirms that the proposed strategic development of land West of Bridgend includes agricultural land of Subgrade 3b and Grades 4 and 5. This is confirmed by the submitted statement by Kernon Countryside Consultants Ltd. It would not result in the loss of any BMV agricultural land. In accordance with the Welsh Government Guidance Note (November 2017) that accompanies the Predictive Agricultural Land Classification Map (Wales) 'planning applications and Local Development Plans are expected to be supported by survey evidence where Best and Most Versatile (BMV) agricultural land is an issue for consideration'.	
<i>Ecology</i> As highlighted by the Authority, a comprehensive desk study and extended Phase 1 survey were undertaken at the site to support the candidate site submission, as well as a further Ecological Briefing Note and Habitat Assessment Summary Note. It is considered that these are more than adequate for the current assessment, and that any further detailed assessments would accompany a planning application.	
The Phase 1 survey concluded that the site is dominated by agriculturally improved grassland of limited botanical interest and thus of low inherent ecological value. Though, habitats of greatest ecological importance do include the native hedgerows delineating the northern boundary and internal field boundaries in addition to woodland habitat and marshy	



Meadows SINC.
The Habitat Assessment Summary Note included a DAFOR level botanical survey to assess the botanical interest of Laleston Meadows SINC. This was also then supported by a further Ecological Briefing Note. Both reports notes that the SINC encompasses four distinct grassland areas divided by scrub, broadleaved woodland and relict hedgerows. The masterplan proposal seeks to maintain biodiversity
across the SINC, particularly the two eastern fields of greater botanical value, which will predominantly be managed for wildlife and biodiversity with restricted
public access, albeit allowing for the continued use of the existing public rights of ways (PRoW) in this area. However, the two western fields provide opportunities for the provision of informal public open space
focused across those areas of lower botanical interest, whilst also providing opportunities for the enhancement and sensitive management of habitat features (including scrub control and removal of undesirable species) to maximise
biodiversity and ensure the long term condition of the SINC is maintained.

# Green Wedge

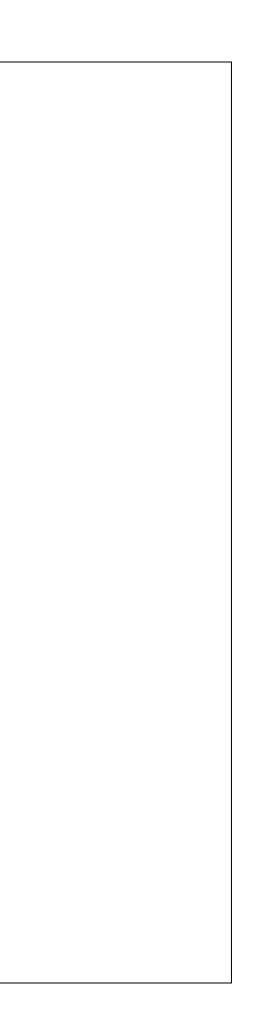
grassland

with

associated

Laleston

The Council's Green Wedge Review, 2021 indicates that the land west of Bridgend is currently located within a Green Wedge as identified within the extant LDP. However, the current DCD and council evidence considers that the land at West Bridgend is identified as making an important contribution to meeting the housing need for the County Borough over the next plan period and is able to provide significant new green infrastructure. The Review considers that whilst LDP Policy ENV2: Development in Green Wedges has been successfully used for its primary objective of preventing coalescence, other policies contained within the extant LDP, particularly ENV1: Development in the Countryside, have also been successful in preventing coalescence.



The Review recommends that as there are policy mechanisms included within the Deposit Plan 2018- 2033 which define settlement boundaries and policies strictly controlling development in the countryside, open space, biodiversity, landscape and the environment whilst also allocating sufficient land for housing within the replacement LDP – Deposit Plan that it is not necessary to take forward the green wedge policy into the Replacement LDP.

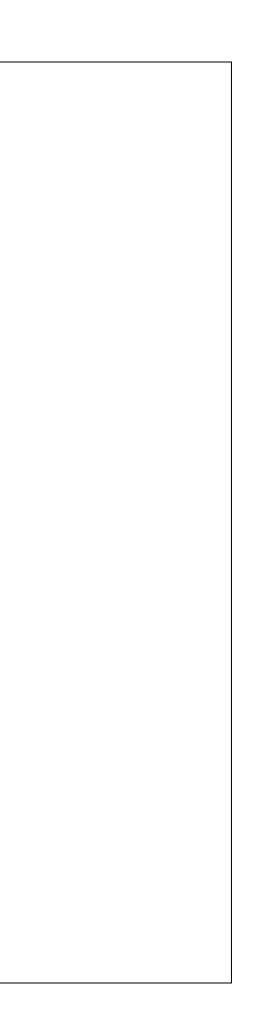
Llanmoor agree that the Green Wedge policy has served its purpose and that there are sufficient new policy mechanisms coming through in the Replacement LDP whilst also enabling the sustainable delivery of new homes at Bridgend.

## Green Infrastructure

The Green Infrastructure Assessment 2021 provides a baseline of Bridgend's Green Infrastructure (GI) assets and takes a proactive approach to the management enhancement of assets including those associated with the proposed growth identified in the Replacement LDP.

In terms of the land west of Bridgend the Assessment has identified a number of options which will be considered as part of the GI design. The assessment recognises that the site will provide new areas of public open space across the site comprising seven key areas of formal open space (including equipped play provision), informal spaces and linkages, green streets, and explore the provision of enabling sensitive public access to part of Laleston Meadows SINC and woodland.

This is supported by the master planning works which have resulted in 7.82ha of natural/semi natural areas for nature conservation, new wetland habitat, SUDS and informal green space for people to experience nature. This is further supported by 2.1ha of children's play space, Informal amenity space, as well as 2.87ha of green



infrastructure, including green streets and amenity green space.

A Landscape and Visual Appraisal has been undertaken to inform the design evolution of the scheme and enabled an integrated approach to potential landscape and visual opportunities and constraints. Overall is it considered that the masterplan framework proposed for the site has been sensitively designed through a landscape and ecology-led approach, with appropriate incorporation of mitigation measures to address concerns in relation to landscape and visual matters. As such, the promotion of this site for residential development should be considered an acceptable extension to the existing settlement of Bryntirion which would not cause significant or wide-ranging adverse effects upon its surrounding landscape context.

### Conclusion

In light of the technical findings above, it is clear that the DCD has been prepared in accordance with Welsh Government guidance set out within PPW and the DPM. Significant technical and viability evidence has been provided by Llanmoor to demonstrate the proposal is sustainable, deliverable and viable at each stage of the plan process. Llanmoor standby their previous submissions and continue to support the allocation of land west of Bridgend as the right location for an urban extension within the Bridgend Sustainable Growth Area which should be progressed to the Replacement LDP adoption.

#### Land South of Bridgend (Island Farm)

Llanmoor do not question the allocation of housing numbers in Bridgend, as the Primary Key Settlement within the County Borough. It is noted that this site was subject to further assessment as part of Stage 2 of the Candidate Site Assessment Report 2021 (Candidate Site Ref. PS.1) where it was considered to have potential to provide a new primary school and accommodate the relocation of

housing trajectory for Land South of Bridgend (Island Farm)

Change to

As documented in the Candidate Site Assessment, the Land South of Bridgend (Island Farm) site promoter has robustly demonstrated delivery in accordance with the requirements set out in the Development Plans Manual. A detailed plethora of evidence has been provided to the Council to support its delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. The related housing trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group

Heronsbridge Special Educational Needs		Meeting. As such, the proposed		South of	Bridgend (Island	Farm) t	rajectory	is both
School in addition to providing up to 850 homes.		unsubstantiated and not supported.						
Whilst the site is considered to be free of								
any significant constraints noted within the								
Candidate Site Assessment and the Full								
Sustainability Appraisal of the DCD, and the								
site has an emerging allocation for a mixed								
use scheme including residential,								
education, commercial and leisure uses in								
the Deposit Plan, under emerging								
placemaking Policy PLA2, a number of								
concerns remain in respect of deliverability.								
The fall-back position of this site is well								
documented, in respect of the outline								
permission (Ref. P/08/1114/OUT) for a								
mixed-use development comprising								
sport/leisure/commercial and office uses								
and subsequent Reserved Matters								
approvals (Ref. P/14/354/RES and								
P/14/824/RES) which have lawfully								
commenced, but not been completed. The								
stalled delivery of the existing permissions								
on site raises questions as to whether the								
site is viable and deliverable, as the mixed								
use scheme with planning permission since								
2014 has not been fully implemented.								
Llanmoor are not aware of a residential								
developer being engaged in the site								
promotion and the sites potential to deliver								
850 residential dwellings in the								
Replacement LDP period is questioned and								
considered ambitious given the track record								
of failing to deliver existing permissions. As								
a consequence we consider the housing								
trajectory provided in both the DCD and								
Appendix 44 Background Paper 4 to be								
optimistic given the history of the site and								
potential difficulties of overcoming a								
potential ransom and then allowing								
sufficient time to market and sell the site to								
a developer who must then obtain planning								
permission. At present the trajectory shows								
completions in 2025-2026 and it is								
considered that this should be moved back								
to 2027-2028.								
	Change to	As documented in the Candidate						
Land East of Pencoed	housing trajectory	demonstrated delivery in accordance	e with the requirem	ents set out	in the Developme	nt Plans N	Janual. A	detailed

	Llanmoor have no objection to the principle of residential development at Pencoed College Campus, but remain cautious about the number of units proposed and the delivery rate set out in the housing trajectory. Llanmoor are not aware of a housing developer being on board to take the site forward and as such do not consider sufficient time has been allowed for the disposal of land and for the vendor to achieve the relevant planning consents to enable the first housing completions in 2025.	for Land East of Pencoed	plethora of evidence has been provided to the Council to support its delive investigations and appraisals, masterplans, a viability assessment, a trans consideration of s106 requirements, infrastructure and costs. This process has confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary communities. The related housing trajectory was prepared initially through close site-promoters, followed by effective collaboration and involvement with a range of s Group Meeting. As documented within the Housing Trajectory Background Pape matters of disagreement on the completion figures or the timing and phasing of site those sites with planning permission and new housing allocations) following conclus Meeting. As such, the proposed change to Land East of Pencoed trajectory is b supported.
	The Candidate Site Assessment Report 2021 identifies the need for flood mitigation and a required easement of a high pressure gas main that traverses the site. It is also noted that Appendix 1 of the Infrastructure Delivery Plan 2021, sets out the infrastructure necessary to support the delivery of strategic sites. In terms of the land east of Pencoed, focusing purely on transport infrastructure, there are a number of elements with unknown costs. The main point Llanmoor wish to highlight at this stage, is that unknown costs can hinder the viability and deliverability of a development. It is noted that the intended phasing/delivery period for development is 2023-2028, however it is questionable whether this is achievable when there appear to be several unknowns relating to the delivery of infrastructure.		
	In light of the survey work required for archaeology and transport, factoring the timescales for the RLDP examination and considering the knock on consequences the COVID lockdowns are having, especially for traffic data to inform Transport Assessments to support relevant planning applications, it is considered highly unlikely that the first tranche of housing would commence in 2023. It is considered more realistic for the first tranche of housing to commence in 2027-28.		
717	Agree with development overall. Concerned about the number of houses already built and continuing to be built and that the	Support with development overall.	Comments noted. The Deposit Plan has been prepared in accordance with Wels Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and

ivery, including numerous site ansport assessment and due has provided a high degree of ora of associated development ry to deliver high-quality new se dialogue with the respective of stakeholders at a Stakeholder of stakeholders at a Stakeholder uper, there were no outstanding ites in the plan period (including clusion of the Stakeholder Group s both unsubstantiated and not

elsh Government Development nd revise a development plan,

transport strategy will not support this. Very supportive of more community leisure facilities and protecting Bridgend	Concerns regarding the level of housing	underpinned by robust evidence to ensure that plans are effective and deliverable an as defined in national policy set out in Planning Policy Wales (PPW).
technology park. Concerned over the proposal to dual the a48. I live on Ewenny roundabout and already the traffic is loud. Improving heronston and new inn road is good but would destroy natural habitats and wildlife	proposed, particularly relating to transport	The Deposit Plan has been underpinned by the identification of the most appropria and housing provision, all of which have been based upon well informed, evidence is need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferre Options). A range of growth scenarios across the whole Replacement LDP period discussed within the Strategic Growth Options Background Paper. This has constructed Borough's demographic situation is likely to change from 2018-2033 and infor response for the Replacement LDP. As such the Replacement LDP identifies an a to enable a balanced level of housing and employment provision that will achieve su support existing settlements and maximise viable affordable housing delivery.
		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 brownfield on the delivery of the brownfield regeneration allocations identified in the existing 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 W developmental pressure on Best and Most Versatile (BMV) agricultural land. However, success in delivering development on brownfield regeneration opportunities remaind deliverable sites (including some greenfield sites) are therefore required to implementation in high need areas and ensure the County Borough's future housing required to the set of the set
		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 A sustainable settlement hierarchy. Based upon the consideration of a compret sustainable growth will be appropriately directed towards the Main Settlements of B with 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 co 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assess based on any specific issues they raised in terms of their deliverability, general locat existing use(s), accessibility, physical character, environmental constraints and of 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.
		The proposed allocation of PLA2 Land South of Bridgend (Island Farm) is supported has now been updated to reflect the final number of dwellings the site is expected to various transport issues relating to the proposed development, and, in combination Assessment, what measures will be taken to deal with the anticipated transport Proposed Policy PLA2 prescribes the appropriate development requirements in rela- the avoidance of any doubt, this number of dwellings does not require the original p expanded, rather more efficient use of the existing net developable area. The densi- is considered appropriate to support a diverse community and vibrant public realm

# and contribute to placemaking,

riate scale of economic growth e based judgements regarding rred Strategy Strategic Growth riod have been analysed and considered how the County formed the most appropriate appropriate plan requirement sustainable patterns of growth,

gy Options Background Paper oment 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 vever, given the existing LDP's ably Bridgend and the Valleys haining. Additional viable and ement SP1, deliver affordable uirements can be realised.

already benefit from significant to enabling transit orientated Appendix 19) to establish a rehensive range of variables f Bridgend and Pencoed along

ite has been assessed against consulted upon (See Appendix essment, sites were examined ation, neighbouring land uses, opportunities. Site promoters es to demonstrate the site's ent, only those sites deemed

ted by Transport Assessment d to deliver. This identifies the on with the Strategic Transport port impacts of the scheme. lation to all forms of travel. For proposed site boundary to be sity and mix of uses proposed Im, whilst generating a critical

mass of people to support services such as public transport, local shops and schools planning policy, higher densities should be encouraged in urban centres and near or interchanges. Given the site's location within the Primary Key Settlement of the proximity to Bridgend Town Centre, this density level is therefore considered appr communities, further bolstered by the proposed enhancements to the active travel
The Replacement LDP aims to reduce private car reliance and help the County Bo 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 Act PLA2 in conjunction with Policy PLA12 should be considered essential in the delive 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 facil employment sites, retail areas and transport hubs, improved access to education facolleges and improvements to, and expansion of, the existing strategic cycle network Opportunities will be maximised to further improve upon these routes, providing war allow integration between new developments and existing communities.
Whilst developments should be encouraged in locations which reduce the need to t sustainable transport, the Council recognises that any development growth will l demand, and that increased traffic levels and congestion is likely to occur if app measures and infrastructure are not delivered. Therefore a Strategic Transport Ass has been undertaken to consider the impact of plan proposals and help guide delivering land allocations by means of modelling and quantifying the transport imp technical notes accompanying this assessment demonstrate that the proposed le within the LDP can be accommodated within the BCBC Highway Network with suits
Furthermore Strategic Policy 5: Sustainable Transport and Accessibility will ensur located and designed in a way that minimises the need to travel, reduces depend enables sustainable access to employment, education, local services and communi be required to deliver, or contribute towards the provision of, active travel scheme road infrastructure, and other transport measures, in accordance with the Bridger the Bridgend Integrated Network Plan (See Appendix 29).
Proposed Policy PLA2 prescribes a number of placemaking principles for Land Sou which are considered instrumental to achieving sustainable places, delivering soc and promoting cohesive communities. Such requirements include pursuing transit- prioritises walking, cycling and public transport use, whilst reducing private moto designed, safe walking and cycling routes must be incorporated throughout th orientated, healthy walkable neighbourhoods. There will be a clear emphasis on p cycling linkages between the site, the Town Centre and surrounding environs. In ac will require the site's green infrastructure network to extend to Newbridge Fie proposed active travel route INM-BR-49 and establishing a 'green lung' that conner Town Centre and Merthyr Mawr. This will facilitate a key multi-functional netwo features south of Bridgend, providing a plethora of economic, health and wellbeing residents.
The site promoter's Transport Assessment has identified that with exception of th junction, and the Ewenny Road Roundabout in the AM peak hour, and the B4268

Is. In accordance with national r major public transport nodes the County Borough and the propriate to foster sustainable I network.

Borough achieve the principles nd expanding upon the current ive travel has been key during ctive Routes detailed in Policy very of any strategic site or any able and healthy lifestyle.

cilities including town centres, facilities such as schools and twork in the County Borough. walking connections which will

b travel and promote the use of I likely result in greater travel opropriate mitigating transport ssessment (See Appendix 36) de and inform the process of mpact of these proposals. The level of development detailed itable mitigation.

ure that development must be ndency on the private car and nity facilities. Development will ne, public transport measures, end Local Transport Plan and

buth of Bridgend (Island Farm), ocially inclusive developments it-orientated development that tor vehicle dependency. Wellthe site to foster community providing safe pedestrian and addition proposed Policy PLA2 fields, thereby capitalising on nects the site to both Bridgend york of integrated spaces and g benefits for new and existing

the A48 proposed site access 65 / Ewenny Road junction in

both peak hours, the revised Island Farm proposals will result in lower traffic flows the assessment network over both the AM and PM peak hour periods, compare development proposals on the Island Farm Site. As the consented flows are tech be existing on the highway network, this revised scheme will provide traffic reducti local highway network. Previous assessment work on the Island Farm site has ic Roundabout, Ewenny Roundabout, and Picton Close Junction all show capare assessment scenarios both including and excluding the consented Island Farm pr revised Island Farm proposals in general bring traffic reductions across these previously consented), with consideration of background traffic growth alone, the require mitigation to operate within capacity during future forecast years. The red the revised Island Farm proposals however, may mean that any mitigation of potentially achieve greater capacity improvements at each junction. The revised p site include three separate vehicle access points onto the local highway network the consented scheme). All three site access junctions are expected to operate with Island Farm proposals. An updated assessment at all three identified junctions, a will be undertaken as part of a future supporting Transport Assessment for the revise which will ideally include up to date baseline traffic flows as the basis for the as allowing).
Reference to the proposed road dualling of the A48 has been removed from intentions focussed on capacity enhancements between Waterton and Laleston, A
In terms of wildlife, the Strategy acknowledges that the County Borough has a rich a broad range of species, habitats and unique, rich landscapes. Policies within refreshed and updated from the existing LDP and will continue to protect the cour line with national planning policy and the Environment Act 2016. These policie countryside, special landscape areas, local / regional nature conservation s development, green infrastructure, nature conservation and natural resources prot development to be sustainable, it needs to be soundly based on good environme well planned and controlled with regard to its environmental impact, in order biodiversity.
There is clear guidance and legislation with regard to the protection of species legislation, Planning Policy Wales (PPW) and TAN5 Nature Conservation and I statutory requirements are set out in Section 61 of the Planning and Compuls Conservation of Habitats and Species Regulations 2017, Environment (Wales) Ac and Resilience of Ecosystems Duty and Section 7 Priority Habitats and Species, S Act 1981 and Section 28G of the Wildlife and Countryside Act 1981. Annex 1 of TA legislation.
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vs through all junctions across ed to the previous consented hnically already considered to tion improvements across the identified that the Broadlands acity issues in forecast year proposals traffic. Although the se junctions (from what was these junctions will still likely duction in flows as a result of measures implemented can proposals at the Island Farm (compared to just two within thin capacity under the revised and the site access junctions sed Island Farm development, ssessment (Covid restrictions

the Replacement LDP, with A48/A473, Bridgend.

ch and varied biodiversity with a the Deposit Plan have been unty borough's environment in ies cover development in the sites, trees, hedgerows and otection and public health. For iental assessments, and to be er to conserve and enhance

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	The Outline planning permission included approval for the construction of a new tr on the A48 that would serve as the primary access to the development site. The road pass through an area of local ecological value – the Island Farm Prisoner of War ( Nature Conservation (SINC). Under the Conservation and Habitats and Species Re European Protected Species Licence was issued. In order to comply with the lice access road from fragmenting the dormice population, the developer proposed approved 'Green Bridge'. However, access to the site could not be formed from the had been established. Under a non-material amendment to the outline planning P/17/29/FUL, the Council consented a temporary construction access from Ewenny a sequence of 'enabling works' that had been approved under P/14/354/RES 'enabling works' are described as: • The setting up of the site facilities via Island Farm Lane and New Inn Roa
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traffic light controlled junction ad construction would however r Camp Site of Importance for Regulation 2010, a conditional cence and to prevent the new ed to construct and plant the he A48 until the Green Bridge ng permission and application y Road/New Inn Road to allow S and P/14/824/RES. These

bad to provide the site facilities ne site;

e to the internal access road e adjacent Technology Drive; d link between the Island Farm infrastructure that will access chnology Drive;

above consents and the details definitions within the planning oment' triggering a number of ent was signed on 11<sup>th</sup> October

2018 which reconciled the enabling works (phase 0) with the original obligation. Or 'enabling works' constituted a material operation and a lawful commencement of
P/14/354/RES and P/14/824/RES. The works have not been completed but the (
permissions are extant.
Notwithstanding the extant planning permission, based on the revised mix of uses there is considered to be an overriding need for the development. Re-allocat accommodation of sustainable growth enshrined in placemaking principles, delive highest need part of the County Borough and enable delivery of two schools on the Heronsbridge Special School. It will also enrich active travel and green infrastructu through creation of a 'green lung' that will connect the site to the Town Ce Development of this edge of settlement site would accord with the Preferred Stra Primary Key Settlement of the County Borough and make a significant contribution to in the LHMA. The site promoter has also provided extensive supporting information viable and deliverable.
Proposed Policy PLA2 prescribes a number of placemaking principles for Land Sout which are considered instrumental to achieving sustainable places, delivering soci and promoting cohesive communities. A final masterplan must be prepared and agr the sites development to demonstrate how these principles will be delivered in an ap This will need to demonstrate how the development will create a well-connected, s extension to Bridgend, comprising a number of character areas that integrate landscape, SINC, adjacent Grade II* listed Merthyr Mawr House, existing housing c Active Travel Networks and public transport facilities. An illustrative masterplan will version of the Replacement LDP to enable all parties to understand how the site terms, including proposed land uses, access, infrastructure requirements, constrai This masterplan will clearly identify the location of the SINC in the context of the wide
<b>Ecological mitigation measures already implemented</b> As part of the existing consent, a mitigation strategy was produced in 2009 to development. It was proposed that the SINC and south west field would become within the new development. Surveys at the site found dormice <i>Muscardinus avel</i> within the woodland and scrub in the SINC and in the hedgerows of the agricultural known to be used by bats for foraging and commuting purposes, and the SINC are a lesser horseshoe bats <i>Rhinolophus hipposideros</i> and brown long-eared bats <i>Pleco</i>
As part of the development process some areas of these habitats were to be laremaining areas due to the impacts of the development, including noise and light sp strategy to counter these losses included the creation of new habitats suitable for the habitat design was guided by the requirements of the protected species of which has site. In addition to dormice and bats, a further condition of the existing consent require of Great Crested Newts <i>Triturus cristatus</i> to be taking into account. The habitat design for the consented scheme included: • <b>Tree and Scrub Planting</b> : translocation and planting new trees and scruption of the protect of the protect of the scheme included:
providing an alternative for displaced animals, including dormice, bats, a amphibians.
Hedgerow Enhancement: enhancement and translocation of hedgerows fit
the eastern site boundary has been undertaken, to create continuous hedge l

On the basis of the above, the of reserved matters consents council's opinion is that the

es now proposed on the site, ation of this site will enable iver affordable housing in the he site, including relocation of ture networks within Bridgend Centre via Newbridge Fields. rategy, channel growth to the to the housing need identified on to evidence the site is both

buth of Bridgend (Island Farm), ocially inclusive developments greed with the Council prior to appropriately phased manner. , sustainable mixed-use urban e positively with the existing clusters, community facilities, vill also be included in the final te will be developed in broad raints and areas of protection. wider allocation.

to offset the impacts of the e a wildlife conservation area *vellanarius* to be present, both al fields. These areas are also e area contains a roost site for *cotus auritis*.

lost, and modification to the spillage. Part of the mitigation the relevant species. As such, had the potential to utilise the uired the habitat requirements

scrub in the south-west field, and shelter for reptiles and

from the centre of the site to e lines which help to buffer the

<ul> <li>expanded SINC site, and to filter out noise and light from development. Additionally, it provides a continuous flight line for bats and allow dormice to disperse more easily along the hedgerows.</li> <li>Bat Roosting Building: a purpose-built bat roost building has been constructed within the south-west field, providing a suitable roost site for both lesser horseshoe and brown long-eared bats, which have both been found roosting in the old hut within the SINC. The building was constructed on the lesser horseshoe key flight line to enable them to rapidly locate it, and also be close to good feeding habitats on the Merthyr Mawr and the River Ogmore.</li> <li>Dormouse Nest Boxes: 35 dormouse next boxes placed within the field, to provide shelter for dormice that are to be displaced from other areas of the site. Placed within the north-east and south-east hedgerows, at approximately 10m interval.</li> <li>Pond creation: two new ponds have been created within the south-west field, with the primary aim of providing habitat for Great Crested Newts.</li> <li>Grassland Creation: rough grassland created around the pond to mitigate loss of existing grassland.</li> </ul>
• Grassiano Creation. Tough grassiano created around the pond to mitigate loss of existing grassiand.
<ul> <li>Proposed mitigation As part of the proposed development of Strategic Allocation PLA2: Land South of Bridgend (Island Farm), an ecological appraisal of the site has been prepared by Ethos Environmental Planning in order to: <ul> <li>To establish baseline ecological conditions and determine the importance of ecological features present within the specified area;</li> <li>To identify the existing habitats on site;</li> <li>To identify the potential for protected species;</li> <li>To identify if any further surveys are required with regards to protected habitats or species; and <ul> <li>To identify any key ecological constraints and make recommendations for design options to avoid significant effects on important ecological features/ resources.</li> </ul> </li> </ul></li></ul>
<b>General habitat – Existing</b> The site was found to be comprised predominately of arable land in its winter stubble with very few plant species noted. The arable field margins provide good habitat for a range of species and buffer the existing hedgerows. There were numerous hedgerows across the site which ranged from mature hedgerows with trees and hazel coppice, to intensively managed species-poor hedgerows which dissected the arable fields. Two hedgerows had been translocated recently to the eastern boundary and appeared to show new growth. Two ponds which were created as part of the previous applications' ecological mitigation works were noted; however, neither was holding much water. Whilst there was very limited aquatic vegetation in the pond, vegetation in the immediate area included large swathes of tall ruderal and ephemeral/short perennial.
Part of the site, in the northern section, was designated as a SINC partially due to the mosaic of grassland, woodland and scrub. This area is proposed for retention within the current masterplan, with the exception of an access road. Part of the site had been subject to clearance to enable works from the previous development proposals. The area cleared was not withing the SINC identified on site. Detailed surveys will be undertaken to consider the botanical diversity of this area.
Part of the area was brownfield land and whilst it was not an appropriate time of year for botany surveys, it was apparent that there were varied nutrient levels and areas of disturbed ground which are likely to result in higher botanical diversity.
Built structures were also noted. These included 'Hut 9' a former prisoner of war camp from World War 2 located within the woodland in the north of the site and a dedicated bat roost located in the south-west of the site.

A number of sink holes were noted across the site. These ranged from those which for a long period of time and had mature trees growing within them, to those ver comprising of small areas of collapsed earth. Natural Resources Wales (NRW) states that consideration will need to be given Dormice, Lesser Horseshoe Bats, Brown Long Eared Bat records on site). Fu consideration will need to be given to impacts on the SINC, and habitat – and
woodland. As such the ecological appraisal also considered the following species: <u>Dormouse</u> The site contains hedgerows and woodland of which were assessed to hold high va
surveys identified the presence of dormice within the SINC located in the north assessed that further surveys would be required to update the status of the site f detailed proposals for the site. <u>Riparian mammals</u> The River Ogmore was present along the eastern edge of the Craig-Y-Parcau, w water vole found south of the site. However, the previous surveys identified no er within the development area. Considering the presence of previous records in t directly adjacent to the site, it is recommended surveys are undertaken for these pro- detailed proposals for the site.
Great crested newt The previous surveys assessed the ponds to be unsuitable for great crested new absent from the site. Since then, it is understood that the previously surveyed po new wildlife ponds created in the south-west of the main site area. The two water walkover had relatively low water levels and limited aquatic vegetation. The cur retention and protection of the ponds. Nevertheless, they could provide suitable bra and it is recommended that a Habitat Suitability Index of each of the ponds within s to inform detailed planning application. Birds
There was a mix of permanent pasture and arable land providing suitable habitat hedgerows and their margins within the fields was assessed to provide potential hat The woodland, hedgerows, scrub and scattered trees were assessed to have hig Evidence of barn owl was found in a stable in the south-east of the site. Further subseen recommended within section 5 to inform detailed proposals for the site. Bats
The previous surveys identified roosting lesser horseshoe and brown long-ea woodland in the SINC. Since the previous surveys were undertaken, a dedicated the south-west of the main site. Additionally, the built structures within the Craig-Y-F poor structural condition and a wide range of bat roosting features were visible for were assessed to hold high potential for roosting bats. Therefore, it was assessed of the structures should be undertaken to assess their status for roosting bats. Add surveys are recommended. The habitats within both sites contained woodland and commuting, foraging and roosting habitats for bats may provide potential commu- bats. A number of mature trees were also noted which could have potential roosting
<u>Badgers</u> The habitats on site were comprised of woodland, grassland and arable land wh badgers. However, it should be noted that the previous survey identified badgers <u>Reptiles</u>

h had apparently been present ery recently emerging and just

n to protected species (Hazel furthermore, NRW states that ncient mature hedgerows and

alue for dormice. The previous h of the site. It was therefore for this species and to inform

with records of both otter and evidence of riparian mammals the area and suitable habitat protected species and to inform

wt (GCN) and that GCN were onds have been removed and er bodies identified during the current proposals indicate the reeding habitat for amphibians 500m of the development site

at for farmland birds. Also, the abitat for ground nesting birds. gh potential for breeding birds. urveys for breeding birds have

ared bats within Hut 9 in the bat roost has been created in Parcau area were in extremely or the external walkover. They d that an updated assessment dditionally, emergence/re-entry d hedgerows, offering potential uting and foraging habitats for ing features for bats.

hich have potential to support to be absent from the site.

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				Much of the site was comprised of arable land and agriculturally intensified gr potential for reptiles. The key features were assessed to be the sections of grassl woodland edges. The site was comprised of common and widespread habitats pro for invertebrates. No detailed surveys will be required.
				<u>SINC Review</u> A SINC review undertaken by the Wildlife Trust indicates that the on-site SINC does significantly since 2011's survey and therefore still qualifies as a SINC. The sma field to the south-east is worth removing from the citation as it is isolated and does r value. The woodland varies in quality but appears to offer habitat for dormice and woodland indicator species. The grassland is not particularly species-rich but add site suffers from antisocial behaviour including fly-tipping, frequent drug use an habitation that is detrimental to the biodiversity of the site.
				The review recommended that dormouse tubes are replaced and monitored and reduced where feasible. Although the grassland areas are not very diverse they a and some scrub control to stop their loss is recommended though not a priority.
				<b>Overall</b> PPW identifies SINC's as local non-statutory protected sites of which carry designations, however it is acknowledged that they can make a vital contributio network for biodiversity and resilient ecosystems, and they should be given adeq Masterplan relating to allocation PLA2: Land South of Bridgend (Island Farm) measures to address previously identified ecological constraints including the re SINC and protection of the artificial bat roost and hedgerows. Furthermore, the maindicated the retention of SINC land within the site boundary, with the exception A48. Areas of ecological value are proposed for retention including existing sink for ange of invertebrates, and an ecological enhancement area located in the so enhanced for ecology in relation to the 2008 sports village application. The master of continuous green areas to ensure a continued network of green and blue infrast
				Further work and surveys are to be undertaken from an ecological perspective in lir of the ecological report. However, there were no 'show-stoppers' found at this stag measures available to ensure that the development of the site is acceptable and minimised.
				NRW support the commitment for the future development of the site to follow a Gree so that the mixture of uses will be fully integrated and designed around the SINC.
				Overall, the site has an extensive planning history which has demonstrated that the ecologically sensitive way through careful scheme design and the use of mitigation ensure that the proposed uses through outlined development requirements are full development of site.
	11	SEE ACCOMPANYING INFO There is a raft of policy and guidance at both national and local level, from the Wellbeing of Future Generations Act at an overarching level to Planning Policy Wales and Bridgord	Concerns relating to Strategic Allocation PLA2: Land South of Bridgond (Island	Comments noted. The Deposit Plan has been prepared in accordance with Wels Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and underpinned by robust evidence to ensure that plans are effective and deliverable as as defined in national policy set out in Planning Policy Wales (PPW).
		Planning Policy Wales and Bridgend County Borough's own local planning guidance, that seeks to ensure that only	Bridgend (Island Farm) and Housing	The Deposit Plan has been underpinned by the identification of the most appropria and housing provision, all of which have been based upon well informed, evidence

grassland providing negligible sland and scrub located at the providing low potential habitats

es not appear to have changed hall section of woodland in the s not appear to add to the site's d bats and there are numerous lds to the site as a whole. The and signs of semi-permanent

nd that antisocial activities are add to the diversity of the site

ry less weight than statutory ion to delivering an ecological equate protection. As such, the m) has included a number of retention of the majority of the masterplan for Island Farm has on of the access road from the k holes; which offer value for a south-western field; previously terplan also indicates retention istructure.

line with the recommendations age, with appropriate mitigation nd any related impacts can be

een Infrastructure led approach

the site can be developed in an ion measures. Policy PLA2 will fully integrated into the future

elsh Government Development nd revise a development plan, and contribute to placemaking,

riate scale of economic growth ce based judgements regarding

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	appropriate development is directed to the right place, taking into account the relevant needs and the constraints, and the balances to be struck between them. But the existence of such policy does not per se prevent, from time to time, some poor choices being made. We feel that PLA2(2) and COM1(2) in their current form represent extremely harmful and unnecessary threats to both the rich biodiversity and Historic Landscape at Merthyr Mawr, and pay lip service to the principles and spirit of policies designed to protect such places. Simply relying on passive designations to provide the necessary level of protection that this exceptional landscape deserves is not sufficient, and will not properly shield it from the existential threat that PLA2(2) and COM1(2) represent to its continued survival. We have a choice as communities and as a society about what we wish to see protected, and for the very many of us that care deeply about places such as Merthyr Mawr, and the benefits they bring to us all in terms of our well-being, sense of place, contact with nature, and our understanding of the past, the imperative to ensure their survival has never been so great. It is hoped that the foregoing comments will be afforded detailed and serious consideration, and that the importance and uniqueness of Merthyr Mawr is given an enhanced status.	COM1(2): Craig y Parcau	<ul> <li>need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferre Options). A range of growth scenarios across the whole Replacement LDP period discussed within the Strategic Growth Options Background Paper. This has to Borough's demographic situation is likely to change from 2018-2033 and info response for the Replacement LDP. As such the Replacement LDP identifies an a to enable a balanced level of housing and employment provision that will achieve su: support existing settlements and maximise viable affordable housing delivery.</li> <li>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 brownfield on the delivery of the brownfield regeneration allocations identified in the existi Maesteg and the Llynfi Valley are still denoted as regeneration priorities th 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. Howey success in delivering development on brownfield Idand in other settlements (notabl) Gateway), there are limited further brownfield sites) are therefore required to implem housing in high need areas and ensure the County Borough's future housing require the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</li> <li>The plan preparation has involved the assessment Mathos the Main Settlements of a sustainable growth will be appropriately directed towards the Main Settlements of B with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</li> <li>The plan preparation has involved the assessment Methodology which was previously co 13 – Candidate Site Assessment Report (2020)). During Stage 2 detailed assessesses the propriately directed towards the Main Settlements of B with the grouped Alian</li></ul>

rred Strategy Strategic Growth riod have been analysed and considered how the County formed the most appropriate appropriate plan requirement sustainable patterns of growth,

gy Options Background Paper oment 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 vever, given the existing LDP's ably Bridgend and the Valleys haining. Additional viable and ement SP1, deliver affordable uirements can be realised.

already benefit from significant to enabling transit orientated Appendix 19) to establish a rehensive range of variables f Bridgend and Pencoed along

ite has been assessed against consulted upon (See Appendix essment, sites were examined cation, neighbouring land uses, opportunities. Site promoters es to demonstrate the site's ent, only those sites deemed sites PS.1 Island Farm & PS.2

lopment will be subject to siteaking principles (See Deposit affordable dwellings, will be he re-location of Heronsbridge propriate community facilities,

Borough has a rich and varied Policies within the Deposit Plan protect the county borough's 2016. These policies cover ure conservation sites, trees,

hedgerows and development, green infrastructure, nature conservation and nature public health. For development to be sustainable, it needs to be soundly bas assessments, and to be well planned and controlled with regard to its environmental and enhance biodiversity.
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<ul> <li>pass through an area of local ecological value – the Island Farm Prisoner of War Nature Conservation (SINC). Under the Conservation and Habitats and Species R European Protected Species Licence was issued. In order to comply with the lice access road from fragmenting the dormice population, the developer proposed approved 'Green Bridge'. However, access to the site could not be formed from the had been established. Under a non-material amendment to the outline planning P/17/29/FUL, the Council consented a temporary construction access from Ewenny a sequence of 'enabling works' that had been approved under P/14/354/RES 'enabling works' are described as: <ul> <li>The setting up of the site facilities via Island Farm Lane and New Inn Roa and temporary internal roads for the delivery of earth moving plant to the Undertaking earthworks to form a plateau for the Tennis Centre;</li> <li>Undertaking the earthworks, drainage works and form the sub base working from the boundary adjacent to the interconnecting spur with the Break through the boundary hedgerow and construct the proposed road site access road and Technology Drive. Install the incoming services i the site via Island Farm Lane. Construction access herein to be via Tec</li> </ul></li></ul>
The aforementioned works were commenced in July 2017 in accordance with the all agreed in relation to the pre-commencement planning conditions. Under the de obligation, the aforementioned works constituted a 'commencement of developer obligations in relation to highway works. A deed of variation to the original agreement 2018 which reconciled the enabling works (phase 0) with the original obligation. O 'enabling works' constituted a material operation and a lawful commencement or P/14/354/RES and P/14/824/RES. The works have not been completed but the permissions are extant.
Notwithstanding the extant planning permission, based on the revised mix of use there is considered to be an overriding need for the development. Re-alloca accommodation of sustainable growth enshrined in placemaking principles, deliv highest need part of the County Borough and enable delivery of two schools on the Heronsbridge Special School. It will also enrich active travel and green infrastructu through creation of a 'green lung' that will connect the site to the Town Ce Development of this edge of settlement site would accord with the Preferred Stra Primary Key Settlement of the County Borough and make a significant contribution in the LHMA. The site promoter has also provided extensive supporting information viable and deliverable.
Proposed Policy PLA2 prescribes a number of placemaking principles for Land Sou which are considered instrumental to achieving sustainable places, delivering so and promoting cohesive communities. A final masterplan must be prepared and ag the sites development to demonstrate how these principles will be delivered in an This will need to demonstrate how the development will create a well-connected, extension to Bridgend, comprising a number of character areas that integrate landscape, SINC, adjacent Grade II* listed Merthyr Mawr House, existing housing of Active Travel Networks and public transport facilities. An illustrative masterplan wi version of the Replacement LDP to enable all parties to understand how the site terms, including proposed land uses, access, infrastructure requirements, constra This masterplan will clearly identify the location of the SINC in the context of the w

ar Camp Site of Importance for Regulation 2010, a conditional cence and to prevent the new ed to construct and plant the the A48 until the Green Bridge ng permission and application by Road/New Inn Road to allow S and P/14/824/RES. These

bad to provide the site facilities he site;

e to the internal access road he adjacent Technology Drive; d link between the Island Farm infrastructure that will access chnology Drive;

above consents and the details definitions within the planning oment' triggering a number of ent was signed on 11<sup>th</sup> October On the basis of the above, the of reserved matters consents e Council's opinion is that the

ses now proposed on the site, cation of this site will enable liver affordable housing in the the site, including relocation of cture networks within Bridgend Centre via Newbridge Fields. trategy, channel growth to the n to the housing need identified ion to evidence the site is both

buth of Bridgend (Island Farm), ocially inclusive developments agreed with the Council prior to appropriately phased manner. , sustainable mixed-use urban te positively with the existing g clusters, community facilities, vill also be included in the final ite will be developed in broad raints and areas of protection. wider allocation.

<ul> <li>Ecological mitigation measures already implemented         As part of the existing consent, a mitigation strategy was produced in 2009 t         development. It was proposed that the SINC and south west field would become         within the woodland and scrub in the SINC and in the hedgerows of the agricultural         known to be used by bats for foraging and commuting purposes, and the SINC are         lesser horseshoe bats <i>Rhinolophus hipposideros</i> and brown long-eared bats <i>Plecc</i>         As part of the development process some areas of these habitats were to be I         remaining areas due to the impacts of the development, including noise and light s         strategy to counter these losses included the creation of new habitats suitable for t         habitat design was guided by the requirements of the protected species of which h         site. In addition to domice and bats, a further condition of the existing consent requ         of Great Created Newts <i>Triturus cristatus</i> to be taking into account.         The habitat design for the consented scheme included:         <ul> <li>Tree and Scrub Planting: translocation and planting new trees and sc             providing an alternative for displaced animals, including dormice, bats, i             amphibians.</li> <li>Hedgerow Enhancement: enhancement and translocation of hedgerows f             the eastern site boundary has been undertaken, to create continuous hedge             expanded SINC site, and to filter out noise and light from development             continuous flight line to enable them to rapidy locate it, and also be close         the Merthyr Mawr and the River Ogmore.</li> <li>Dormouse Nest Boxes: 35 dormouse next boxes placed within the field, te         that are to be displaced from other areas of the site. Placed within the         hedgerows, at approximately 10m interval.</li> <li>Pond creation: two new ponds have been created within the south-west         providing habitat for Great Cr</li></ul></li></ul>
The site was found to be comprised predominately of arable land in its winter stubbl noted. The arable field margins provide good habitat for a range of species and buf

to offset the impacts of the ne a wildlife conservation area *vellanarius* to be present, both ral fields. These areas are also e area contains a roost site for *cotus auritis*.

e lost, and modification to the spillage. Part of the mitigation the relevant species. As such, had the potential to utilise the guired the habitat requirements

scrub in the south-west field, , and shelter for reptiles and

s from the centre of the site to e lines which help to buffer the nt. Additionally, it provides a ong the hedgerows.

structed within the south-west o long-eared bats, which have vas constructed on the lesser use to good feeding habitats on

to provide shelter for dormice he north-east and south-east

t field, with the primary aim of

e loss of existing grassland.

of Bridgend (Island Farm), an ing in order to:

of ecological features present

bitats or species; and s for design options to avoid

ble with very few plant species buffer the existing hedgerows.

	There were numerous hedgerows across the site which ranged from mature hed
	coppice, to intensively managed species-poor hedgerows which dissected the arable been translocated recently to the eastern boundary and appeared to show new gro
	Two ponds which were created as part of the previous applications' ecological n however, neither was holding much water. Whilst there was very limited aqua vegetation in the immediate area included large swathes of tall ruderal and epheme
	Part of the site, in the northern section, was designated as a SINC partially due woodland and scrub. This area is proposed for retention within the current masterp access road. Part of the site had been subject to clearance to enable works from proposals. The area cleared was not withing the SINC identified on site. Detailed s consider the botanical diversity of this area.
	Part of the area was brownfield land and whilst it was not an appropriate time of ye apparent that there were varied nutrient levels and areas of disturbed ground which botanical diversity.
	Built structures were also noted. These included 'Hut 9' a former prisoner of war car within the woodland in the north of the site and a dedicated bat roost located in the
	A number of sink holes were noted across the site. These ranged from those which for a long period of time and had mature trees growing within them, to those very comprising of small areas of collapsed earth.
	Natural Resources Wales (NRW) states that consideration will need to be given Dormice, Lesser Horseshoe Bats, Brown Long Eared Bat records on site). Fur consideration will need to be given to impacts on the SINC, and habitat – and woodland.
	As such the ecological appraisal also considered the following species:
	<u>Dormouse</u> The site contains hedgerows and woodland of which were assessed to hold high val surveys identified the presence of dormice within the SINC located in the north assessed that further surveys would be required to update the status of the site for detailed proposals for the site.
	<u>Riparian mammals</u> The River Ogmore was present along the eastern edge of the Craig-Y-Parcau, w water vole found south of the site. However, the previous surveys identified no ev within the development area. Considering the presence of previous records in the directly adjacent to the site, it is recommended surveys are undertaken for these pro- detailed proposals for the site.
	<u>Great crested newt</u> The previous surveys assessed the ponds to be unsuitable for great crested new absent from the site. Since then, it is understood that the previously surveyed por

edgerows with trees and hazel ble fields. Two hedgerows had rowth.

mitigation works were noted; uatic vegetation in the pond, meral/short perennial.

e to the mosaic of grassland, rplan, with the exception of an om the previous development I surveys will be undertaken to

year for botany surveys, it was ich are likely to result in higher

amp from World War 2 located ne south-west of the site.

h had apparently been present ery recently emerging and just

n to protected species (Hazel furthermore, NRW states that ncient mature hedgerows and

value for dormice. The previous h of the site. It was therefore for this species and to inform

with records of both otter and evidence of riparian mammals the area and suitable habitat protected species and to inform

wt (GCN) and that GCN were onds have been removed and

new wildlife ponds created in the south-west of the main site area. The two water walkover had relatively low water levels and limited aquatic vegetation. The cu retention and protection of the ponds. Nevertheless, they could provide suitable bre and it is recommended that a Habitat Suitability Index of each of the ponds within 5 to inform detailed planning application.
<u>Birds</u> There was a mix of permanent pasture and arable land providing suitable habitat hedgerows and their margins within the fields was assessed to provide potential hab The woodland, hedgerows, scrub and scattered trees were assessed to have high Evidence of barn owl was found in a stable in the south-east of the site. Further sur been recommended within section 5 to inform detailed proposals for the site.
<u>Bats</u> The previous surveys identified roosting lesser horseshoe and brown long-eard woodland in the SINC. Since the previous surveys were undertaken, a dedicated b the south-west of the main site. Additionally, the built structures within the Craig-Y-P poor structural condition and a wide range of bat roosting features were visible for were assessed to hold high potential for roosting bats. Therefore, it was assessed of the structures should be undertaken to assess their status for roosting bats. Add surveys are recommended. The habitats within both sites contained woodland and H commuting, foraging and roosting habitats for bats may provide potential commut bats. A number of mature trees were also noted which could have potential roosting
<u>Badgers</u> The habitats on site were comprised of woodland, grassland and arable land whi badgers. However, it should be noted that the previous survey identified badgers to
<u>Reptiles</u> Much of the site was comprised of arable land and agriculturally intensified group otential for reptiles. The key features were assessed to be the sections of grasslat woodland edges. The site was comprised of common and widespread habitats profer invertebrates. No detailed surveys will be required.
SINC Review A SINC review undertaken by the Wildlife Trust indicates that the on-site SINC does significantly since 2011's survey and therefore still qualifies as a SINC. The smal field to the south-east is worth removing from the citation as it is isolated and does n value. The woodland varies in quality but appears to offer habitat for dormice and to woodland indicator species. The grassland is not particularly species-rich but adds site suffers from antisocial behaviour including fly-tipping, frequent drug use an habitation that is detrimental to the biodiversity of the site. The review recommended that dormouse tubes are replaced and monitored and reduced where feasible. Although the grassland areas are not very diverse they a and some scrub control to stop their loss is recommended though not a priority.
Overall PPW identifies SINC's as local non-statutory protected sites of which carry designations, however it is acknowledged that they can make a vital contribution

er bodies identified during the current proposals indicate the reeding habitat for amphibians 500m of the development site

at for farmland birds. Also, the abitat for ground nesting birds. gh potential for breeding birds. urveys for breeding birds have

ared bats within Hut 9 in the bat roost has been created in Parcau area were in extremely or the external walkover. They d that an updated assessment ditionally, emergence/re-entry d hedgerows, offering potential uting and foraging habitats for ing features for bats.

hich have potential to support to be absent from the site.

grassland providing negligible sland and scrub located at the providing low potential habitats

es not appear to have changed hall section of woodland in the s not appear to add to the site's d bats and there are numerous lds to the site as a whole. The and signs of semi-permanent

nd that antisocial activities are add to the diversity of the site

y less weight than statutory on to delivering an ecological

	network for biodiversity and resilient ecosystems, and they should be given adeque Masterplan relating to allocation PLA2: Land South of Bridgend (Island Farm) measures to address previously identified ecological constraints including the rete SINC and protection of the artificial bat roost and hedgerows. Furthermore, the mar- indicated the retention of SINC land within the site boundary, with the exception A48. Areas of ecological value are proposed for retention including existing sink h range of invertebrates, and an ecological enhancement area located in the sou enhanced for ecology in relation to the 2008 sports village application. The master of continuous green areas to ensure a continued network of green and blue infrastr
	Further work and surveys are to be undertaken from an ecological perspective in lin of the ecological report. However, there were no 'show-stoppers' found at this stage measures available to ensure that the development of the site is acceptable and minimised.
	NRW support the commitment for the future development of the site to follow a Green so that the mixture of uses will be fully integrated and designed around the SINC.
	Overall, the site has an extensive planning history which has demonstrated that the ecologically sensitive way through careful scheme design and the use of mitigation ensure that the proposed uses through outlined development requirements are fur development of site.
	The Replacement LDP is accompanied by a SA Report (incorporating SEA) to as and significant environmental effects of all substantive component within the F allocations, etc.) and any identified reasonable alternatives. This builds directly including an SA Scoping Report (2018) and an Interim SA Scoping Report (207 Replacement LDP Preferred Strategy. The Deposit Plan SA Report demonstrates SEA, process has informed the development of the Deposit Plan, including the including the including the including swithin the document. As a result, the SA Report concludes that there is sustainability issues in Deposit Plan, with plan components performing well agains 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 asse development resulting in adverse effects on the historic environment to be robus 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 Schedul are exceptional circumstances. These issues are grouped under 'Cultural Herita Sustainability Objectives considered by the SA. The potential for adverse impacts of is an important consideration in determining the overall sustainability and thus allocations. Any sustainability impacts would also depend on the scale of development
	For Land South of Bridgend (Island Farm), the SA identified the potential for adverse of the site to scheduled monuments and listed buildings. However, the requirer strategic site allocation to be supported by a detailed masterplan) and PLA2 (for allocation to implement specific masterplan development principles) represent address the identified likely significant effects. These requirements also enhance th of the strategic site allocation more generally. The SA identifies relevant masterp

quate protection. As such, the n) has included a number of etention of the majority of the nasterplan for Island Farm has n of the access road from the holes; which offer value for a outh-western field; previously erplan also indicates retention structure.

line with the recommendations ge, with appropriate mitigation any related impacts can be

en Infrastructure led approach

he site can be developed in an on measures. Policy PLA2 will fully integrated into the future

Assess the likely sustainability Plan (strategy, policies, site y upon previous SA reporting 2019) which accompanied the tes how the SA, incorporating ncorporation of recommended e is good coverage of all key inst 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 dings and their settings, along luled Monuments, unless there tage', which is one of the 14 s on Cultural Heritage was and is suitability of candidate site oment proposed.

se impacts due to the proximity rements under SP2 (for each or the proposed strategic site at forms of mitigation to help the sustainability performance erplan development principles

included in these spatial development policies to help ensure the avoidance of like which could otherwise occur from this development proposal. Additional masterplate
also included within Policy PLA2 to ensure site applies Good Design principles and approach to siting, design, construction and operation in accordance with Pla principles were informed by SA findings and have been incorporated into the fina assessment scoring updated to reflect their inclusion in the Deposit Plan. The tour 9 will also be preserved and enhanced through improved linkages and active oppo
In relation to landscape matters, the site promoter has considered the landscape of measures. The site is not subject to any local or national, statutory or non-statut albeit there are listed buildings and TPOs on the edge of the site (neither are direct development). LANDMAP analysis reflects that the sites are not subject to any det "high" and "outstanding" against certain criteria, it also performs as "medium" and overall the level of sensitivity is comparable to similar parcels of land on the urbar the development of the site is not considered to undermine any of the six land identified as typifying the Merthyr Mawr Farmland, Warren and Coastline Landscape updated LVIA will be required to inform and accompany further masterplanning worl application). Nevertheless, Policy PLA2 will ensure the design and layout of surrounding landscape, minimising visual impacts through the inclusion of mitigation with the existing landscape and access features. Appropriate landscaping treatmer southern fringes of the site in order to minimise visual impacts on adjacent uses.
The land surrounding Merthyr Mawr is recognised within the Replacement LDP ar various designations and policies (see Appendix 25 – Special Landscape Design Landscape Character Assessment). As highlighted by Policy SP17 the historic Warren is a National Nature Reserve. These are protected under the Wildlife and amended by the Countryside and Rights of Way (CROW) Act 2000, the Nature Communities (NERC) Act 2006 and the Environment (Wales) Act 2016. Policy SP17 statutorily designated sites of national importance and any development proposal be subject to special scrutiny to establish any potential or indirect effects. The onus potential developer and/or owner to clearly demonstrate the case for the sit development should not be located elsewhere on a site of less significance to na design in conjunction with appropriate planning conditions and/or planning oblig pursued by the local planning authority with a view to overcoming potential adverse i resource, and to ensure protection and enhancement of a site's nature conservation.
Merthyr Mawr Warren is also designated as a Special Landscape Area (See Polic Special Landscape Designations), in recognition of the surrounding character a Policy DNP4 protects such designations from inappropriate development. In order possible, development within a SLA should retain and enhance the positive attribut to remove or mitigate any negative influences. In order to achieve this, the de development should respect the special landscape context. In particular, design traditions of the locality in its form, materials and details and aim to assimilate the landscape.
Merthyr Mawr Village is also designated as a Conservation Area in recognition of th or historic interest, the character or appearance of which it is desirable to preserv development proposals, the Council will seek to resist new development or the de unless it would preserve or enhance the character and appearance of the cor DNP11).

tely significant adverse effects an development principles are nd a Sustainable Placemaking lanning Policy Wales. These nal Deposit Plan, with SA site urism and culture asset of Hut ortunities.

effects in addition to mitigation utory landscape designations, ectly affected by the proposed esignations. Whilst scoring as nd "low" for other criteria and an fringe of Bridgend. Further, ndscape sensitivities that are pe Character Area. A detailed, ork (as part of a future planning f the site has regard to the on measures that provide links ents must be utilised along the

and is very much protected by signations and Appendix 26 – c landscape of Merthyr Mawr and Countryside Act 1981, as atural Environment and Rural 17 specifically seeks to protect al which affects such sites will us will be firmly placed on any site's development, and why nature conservation. Sensitive bligations/agreements will be e impacts on the environmental ion interest.

licy DNP4 and Appendix 25 – and quality of the landscape. er to be acceptable, wherever utes of its landscape and seek design, scale and location of gn should reflect the building ne development into the wider

the area's special architectural ve or enhance. In considering lemolition of existing buildings onservation area. (See Policy

488	Health is missing from your proposal. What about health services	What about health services	The Council has been engaging with Cwm Taf Morgannwg University Health B Replacement LDP process. Early meetings were held to ensure the level and s proposed was clarified to help facilitate alignment of service provision. As part of S Assessment, the health board amongst other consultation bodies were invited to p of those sites identified as suitable for future development and possible allocation in Council cannot ultimately control provision of primary healthcare services, close
			continue and be maintained with Cwm Taf Morgannwg University Health Board provision planning as site allocations with the Deposit Plan progress.
			In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has be 37). The IDP provides a single schedule of all necessary infrastructure withou allocated sites for the anticipated quantum of proposed housing/employment uses not proceed. Such infrastructure includes transport, education, health, environme addition to community and cultural infrastructure.
516	I'll let Bridgend and Pencoed residents comment on this.	No changes proposed	Comments noted.
707	Don't know the area well enough to comment.		Comments noted.
847	No	No changes proposed	Comments noted.
996	No	No changes proposed	Comments noted.
329	No	No changes proposed	Comments noted.
614	Yes. The plan for development on land west of Bridgend between Bryntiruon and Laleston is completely inappropriate and will result in the historic village of Laleston just becoming part of Bridgend's urban sprawl. The development plans claim to include a minute 'buffer zone' but the development map shows that Laleston will be linked to Bryntirion which in turn is linked to Bridgend. There will be no green space and the village will become subsumed as a suburb of the town itself. The proposed development area is also totally inappropriate in terms of increased traffic, the lane to the west of the proposed development site where my house is situated is already used as a rat run and this will only get worse. Also this site is miles away from any M4 junctions so will cause further traffic jams in the town itself and on the A48. The traffic lights at Broadlands are already a bottle neck with jams every day during rush hour. Also the proposal for a school on the site is baffling as the local comprehensive schoools are already over subscribed. Basically any development of	to loss of green space, infrastructure, school's capacity, traffic, air quality, the historic environment and employment.	The Deposit Plan has been prepared in accordance with Welsh Government Develor 3). It contains guidance on how to prepare, monitor and revise a development evidence to ensure that plans are effective and deliverable and contribute to placen policy set out in Planning Policy Wales (PPW). The Deposit Plan has been underpinned by the identification of the most appropria and housing provision, all of which have been based upon well informed, evidence need, demand and supply factors (See Appendix 42 – Background Paper 2: Preferr Options). A range of growth scenarios across the whole Replacement LDP peri- discussed within the Strategic Growth Options Background Paper. This has of Borough's demographic situation is likely to change from 2018-2033 and infor response for the Replacement LDP. As such the Replacement LDP identifies an a to enable a balanced level of housing and employment provision that will achieve su support existing settlements and maximise viable affordable housing delivery. The distribution of growth is further evaluated and justified in the Spatial Strategy (See Appendix 43 – Background Paper 3). The strategy prioritises the developen 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 Regeneration Growth Areas. The ongoing commitment to brownfield developme 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 regeneration opportunities rema Gateway), there are limited further brownfield regeneration opportunities rema

Board from the outset of the d spatial distribution of growth f Stage 3 of the Candidate Site o provide comments in respect n in the Deposit LDP. Whilst the lose working relationships will rd. This will be key to service

been produced (See Appendix out which the development of es within the plan period could nental management, utilities in

elopment Plans Manual (Edition nt plan, underpinned by robust emaking, as defined in national

priate scale of economic growth ce based judgements regarding erred Strategy Strategic Growth eriod have been analysed and s considered how the County nformed the most appropriate n appropriate plan requirement sustainable patterns of growth,

egy Options Background Paper pment of land within or on the field sites. It continues to focus isting 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

large housing estates of this kind need to be	deliverable sites (including some greenfield sites) are therefore required to implemente beweing in high need areas and ensure the County Derough's future beweing require
on sites adjacent to the M4 or with routes to the M4 which will not add to the traffic chaos	housing in high need areas and ensure the County Borough's future housing requir
in the town centre/Broadlands/Laleston. They also need to be sensitive to existing historic villages which need to remain distinctly seperate entities from the town of Bridgend or risk losing their entire character and becoming suburbs of the town itself.	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 A sustainable settlement hierarchy. Based upon the consideration of a compressustainable growth will be appropriately directed towards the Main Settlements of E with 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 co 13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assess based on any specific issues they raised in terms of their deliverability, general locat existing use(s), accessibility, physical character, environmental constraints and o 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 wil requirements including masterplan development principles and placemaking prin PLA3 – Page 71). The provision of new residential dwellings, including affordable alongside 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 Llangewy 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 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 travisite and off-site measures to provide good quality, attractive, legible, safe and accele linkages in accordance with Active Travel design. Improved linkages must be provided to accord with the proposed routes within the Council BR-55, INM-BR-57, INM-BR-58, INM-BR-127 and 2120.
	The Replacement LDP is accompanied by a SA Report (incorporating SEA) to as and significant environmental effects of all substantive component within the F allocations, etc.) and any identified reasonable alternatives. This builds directly including an SA Scoping Report (2018) and an Interim SA Scoping Report (2017 Replacement LDP Preferred Strategy. The Deposit Plan SA Report demonstrates SEA, process has informed the development of the Deposit Plan, including the including the including swithin the document. As a result, the SA Report concludes that there is sustainability issues in Deposit Plan, with plan components performing well agains 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

ement SP1, deliver affordable uirements can be realised.

already benefit from significant to enabling transit orientated Appendix 19) to establish a rehensive range of variables f Bridgend and Pencoed along

ite has been assessed against consulted upon (See Appendix essment, sites were examined ation, neighbouring land uses, opportunities. Site promoters es to demonstrate the site's ent, only those sites deemed site 308.C1 Bridgend (West of)

will be subject to site-specific principles (See Deposit Policy ble units, will be incorporated ties, public open space, plus

wydd Church and Churchyard nains as part of the wider site. he site, providing access to the closed byway with the existing avel, Policy PLA3 requires onccessible pedestrian and cycle provided along the A473, with station and train station). New cil's ATNM: INM-BR-52, INM-

assess the likely sustainability Plan (strategy, policies, site y upon previous SA reporting 2019) which accompanied the tes how the SA, incorporating ncorporation of recommended e is good coverage of all key inst the SA Framework. It also A Framework, plus no likely

ut multiple requirements for sets and for the need for any

development resulting in adverse effects on the historic environment to be robus 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 Schedul are exceptional circumstances. These issues are grouped under 'Cultural Herita Sustainability Objectives considered by the SA. The potential for adverse impacts of is an important consideration in determining the overall sustainability and thus 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 p impact upon the historic environment. To facilitate this assessment, the Council co Gwent Archaeological Trust (GGAT) early on in the process for their views on the li historic environment along with recommendations for mitigation. Any identified in mitigated by site promoters.
For Land West of Bridgend the SA identified the potential for adverse impacts due scheduled monuments and important archaeological sites. However, the require strategic site allocation to be supported by a detailed masterplan) and PLA3 (for allocation to implement specific masterplan development principles) represent address the identified likely significant effects. These requirements also enhance the of the strategic site allocation more generally. The SA identifies relevant masterplan included in these spatial development policies to help ensure the avoidance of like which could otherwise occur from this development proposal. Additional masterplan also included within Policy PLA3 to ensure site applies Good Design principles and approach to siting, design, construction and operation in accordance with Pla principles were informed by SA findings and have been incorporated into the final assessment scoring updated to reflect their inclusion in the Deposit Plan.
Further to this, the site promoter commissioned EDP to undertake an Archaeological The assessment establishes that the site does not contain any World Heritage Monuments, listed buildings, registered historic parks and gardens or historic land be a presumption in favour of their physical preservation in-situ and against archaeological remains, the site is identified as having moderate to high potent the medieval period, particularly in its northern extremity, which is adjacent to the s Church. However, the land is a SINC and will not be developed. Policy PLA3 positively integrate with the remains of Llangewydd Church and Churchyard Sched 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 1km study area, the potential for archaeology of these periods within the site is d settlement was focused elsewhere in the locality and any archaeology of this likely to relate to agriculture. Overall, the baseline data indicate that the probabili- being present is low. Any further archaeological investigation can reasonably appropriately worded planning condition appended to a planning permission.
Potential impacts upon the setting of historic assets in the locality have focused significant effects arising from changes to setting have been identified for scheduled and registered parks and gardens. In respect of the Laleston Conservation Area significant changes to its visual setting. It is acknowledged that development in the remove a part of the agricultural landscape around Laleston which forms a east. However, agricultural land will remain on all sides around Laleston, which wi

ustly justified. There is also a dings 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 oment proposed.

e potential to cause an adverse consulted with the Glamorganlikely range of impacts on the impacts were required to be

e to the proximity of the site to rements under SP2 (for each or the proposed strategic site at forms of mitigation to help the sustainability performance erplan development principles kely significant adverse effects an development principles are nd a Sustainable Placemaking lanning Policy Wales. These nal Deposit Plan, with SA site

ical and Heritage Assessment. age Sites, Scheduled Ancient adscapes, where there would ast development. In terms of tential to contain remains from site of the former Llangewydd 3 will require development to eduled Ancient Monument in a

In activity in the surrounding deemed low. Post-medieval s period within the site is most ility of significant archaeology ly be secured through an

ed on the 1km study area. No ed monuments, listed buildings ea, there will also not be any he southern part of the Site will a buffer from Bryntirion to the will retain its character as a

discrete settlement, while landscaping measures associated with the deve impression of coalescence. This is assessed as an impact of a minor order, w conservation area being retained. Policy PLA3 will require development to to maint between the site and Laleston to retain the separate identities and character preventing coalescence. The site promoter also commissioned EDP to undertake a Landscape and Visual A of the appraisal was firstly to inform the design evolution of the scheme which ena to potential landscape and visual opportunities and constraints. The LVA outlines that there are adverse and beneficial landscape effects resulting f However, the embedded mitigation and the approach to design is considered to m time as the proposed landscape establishes and overall the predicted effects are n 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 charact appraisal included assessment for Bridgend County Borough (LCABC) (201 assessment. The appraisal confirms that the site relates well both in landscape an landscape and settlement, and that the site represents a logical extension to Bryr design is sensitive to the site's existing characteristics. The design appraised resp site such as the Bridgend Circular Walk, the byway, the hedgerow network and w such the proposals put forward at this stage are considered to be a thoughtful a development of this site. Mitigation measures include:
<ul> <li>The Laleston Meadows SINC would be brought into regular long-term man the visual amenity and landscape character of this northern part of the site. A development back from the SINC, and dwellings would front onto it. The mitigation receptor site (in ecological terms) and the grazed fields current improved by the proposals as well as maintained in the long term. The SINC informal and natural play on site provided increased public access would function;</li> <li>The site contains very few of the key characteristics listed in the published of The site has a strong network of hedgerows, some which would be lost and urban form. However, the retained hedgerows and trees would be protected some of the character of the SLA within which the site lies would be retained.</li> <li>Provision of structural landscaping, a mix of native and non-native trees and the site for biosecurity, diversity of ecosystems and habitat creation as well a residents. Ares of open space would be bolstered by considered struct aesthetically pleasing urban development which is well integrated with the p and the setted landscape character currently experienced in the local area;</li> <li>Retention of existing landscape features (hedgerows and trees) is a priority of it forms a desirable strong green framework that links with the wider green inf and south of the site;</li> <li>Adequate replacement planting of local species in appropriate locations to trees and hedgerows, and enhancement planting; and</li> <li>The location of public open space, public footpaths and the street-alignment and reflect local character.</li> </ul>

velopment will mitigate any with the special interest of the ntain a strategic green corridor er of these settlements whilst

Appraisal (LVA). The purpose nabled an integrated approach

from development of this site. minimise adverse effects over not considered unacceptable jic housing site.

acter and visual amenity. The nent (NLCA), LANDMAP, and 013) in addition to an on-site and visual terms to the existing yntirion provided a considered sponds sensitively to assets on vegetated site boundaries. As and easily assimilated future

Anagement. This would protect A landscape buffer would set he SINC could be used as a ntly within the SINC could be C offers a great opportunity for d not clash with its ecological

d documents on Laleston SLA. Ind the field pattern replaced by cted by landscape buffers and ed;

as the visual amenity of future uctural planting to create an proposed landscape strategy a;

of the emerging proposals as
 nfrastructure to the north, west

to compensate for any loss of

t has been designed to protect

r	
	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 an 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 r 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 exi 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 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 incom adverse effects and/or visual intrusion on the wider landscape.
	In terms of biodiversity/ecology, an ecological desk study and Extended Phase 1 s by EDP. The desk study has noted that within the Study Site's zone of influence the and non-statutory designated sites present, most notably Laleston Meadows S site itself.
	Given the combination of designated sites, it is concluded that any future pl to consider the potential for direct and indirect impacts to arise upon qualifying fea Meadows SINC. However, it is inherent within the emerging masterplan that the La its associated designated features will be retained. Furthermore, such retained feat from potential harm, damage and disturbance through the sensitive design of built d boundaries and inclusion of suitable buffers.
	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 the benefit to both visual and recreational amenity, conservation and biodiversity enlatter, the SINC provides a potential space to accommodate ecological mitigation and and thus offset ecological impacts that may arise during the development of adjace
	An Extended Phase 1 survey was undertaken in February 2020, supplemented by March 2020. The Phase 1 survey concluded that the site is dominated by agricultur limited botanical interest and thus of low inherent ecological value. Habitats of gr 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 p for their potential to support great crested newt.
	The results of the desk study and Extended Phase 1 survey have influenced the matter to locate development across those habitats of predominantly limited ecol boundary habitats as far as possible. Where retained, such features have been acc informal green space and sustainable transport links, which ultimately enhances con and contributes to the wider green infrastructure resource.

landscape and visual effects and contained within a c.400m

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

he landscape in which it sits, its must be minimised through scape and access features to ment must also not be to the corporate measures to reduce

I survey has been undertaken here are a number of statutorily s SINC which overlaps with the

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

the Study's Site boundary will ben space and wildlife zones. this will provide a significant enhancement. In respect of the and biodiversity enhancements cent land.

by further roosting bat works in turally improved grassland of greatest ecological importance eld boundaries in addition to NC. The roosting bats surveys e ponds have been considered

masterplan which has sought ological value whilst retaining ccommodated within proposed onnectivity throughout the Site

Where avoidance is not possible, however, and will result in the loss of interpredominantly 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 where necessary. This will be in addition to the sensitive positioning of buil retained boundary features to minimise damage.
The report also highlights further detailed habitat and species surveys w inform a planning application and ensure proposed mitigation is appropria include a Dormouse survey, which was raised in comments received from NF the development to retain and provide suitable buffers to habitats, particularly I Ancient and/or Semi-Ancient Woodland) and Laleston Meadows SINC, which bordering the northern and north-western boundaries of the site. PLA3 will also red and agree ecological management plans including proposals for mitigation, enh for 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 cen access to the Bridgend Circular Walk and realigned Public Right of Way. Add hectares of retained green infrastructure and new areas of public open space seven key areas of formal open space (including 0.5ha of equipped play p and linkages, green streets, and explore the provision of enabling sensitive public Meadows SINC and woodland.
In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has bee 37). The IDP provides a single schedule of all necessary infrastructure without allocated sites for the anticipated quantum of proposed housing/employment uses not proceed. Such infrastructure includes transport, education, health, environment addition to community and cultural infrastructure.
With regards to education and comprehensive school provision, a contribution will the Education Facilities and Residential Development SPG and a decision will be n Authority as to how the sum will be utilised.
In terms of sewerage, Dwr Cymru Welsh Water have confirmed that reinforcement the clean and foul network to accommodate the site as a whole and a Hydraulic M required to inform such works. They have also confirmed that there are no insur delivery of the site.
With respect of drainage, the site promoter has prepared a high-level drainage stratistic is located with DAM Zone A, which is used within Technical Advice Note considered to be little to no risk of fluvial or tidal flooding at such a location. This reference of NRW, and in the Strategic Flood Consequence Assessment (SCFA which in site as green in its RAG assessment. As such, all proposed land uses are permite consequence assessment. The SFCA does highlight that a small proportion of the flooding due to surface water, which corresponds with topographic depressions in There are two areas most at risk of surface water flooding. The first corresponds flowing down into the north western corner of the site. This area of the site is curred which is to be retained as part of the proposals. It is therefore considered that this risk will have little influence on development proposals. The second area is a key second area is a key second action.

aternal field boundaries (albeit ize and extent to enable future al constraints and compensate uilt development away from

which are recommended to priate and proportional. These NRW. Policy PLA3 will require hedgerows, trees (including th includes the green space require the developer to submit mhancement and maintenance te) and provide appropriate

entral part of the site, providing dditionally, PLA3 requires 4.1 e across the site comprising provision), informal spaces olic access to part of Laleston

been produced (See Appendix but which the development of es within the plan period could mental management, utilities in

Il be taken in accordance with made by the Local Education

ent works are required on both Modelling Assessment will be surmountable obstacles to the

trategic of which confirms that the 15 to indicate that there is effected in comments received informs the LDP and flags the nitted without need for a flood he site (4.9%) has a low risk of a running from north to south. Is with a path of surface water rently comprised of woodland his area of surface water flood y surface water flow route that

runs through the centre of the site towards the A473 where a small area of high surface the site will be retained where reaching
The surface water flow routes in this part of the site will be retained where possible surface water drainage strategy through the use of SUDs and green corridors.
A revised TAN15 is due to be implemented in June 2023. This will be supported Planning, which includes climate change information to show how this will affect flo century. It shows the potential extent of flooding assuming no defences are in plac Map for Planning shows the site to be located outside of any flood zone and is there risk of flooding
In terms of the impacts on primary healthcare provision, the Council has been Morgannwg University Health Board from the outset of the Replacement LDP proce- to ensure the level and spatial distribution of growth proposed was clarified to help for provision. As part of Stage 3 of the Candidate Site Assessment, the health board bodies were invited to provide comments in respect of those sites identified as sui and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately healthcare services, close working relationships will continue and be maintained University Health Board. This will be key to service provision planning as site allocation progress.
The site promoter commissioned Air Quality Consultants to undertake an Air Quality impact of the proposed development and subsequent increased traffic emissions traffic on the Air Quality Management Area (AQMA) of Park Street. Concentration number of worst-case receptors, representing existing properties where impacts ar addition, the impacts of traffic emissions from local roads on the air quality for future development have been assessed.
The assessment has demonstrated that concentrations of PM10 and PM2.5 will real existing receptors in 2022, with or without the proposed development, and that a will be negligible.
In the case of annual mean nitrogen dioxide, concentrations will remain below the ob- receptor (representative of 6-8 homes) in 2022, with or without the proposed development unlikely that any new homes within the development will be occupied to would be reasonable to expect concentrations at these 8 homes to be below the ob- demonstrated that the impacts in terms of annual mean nitrogen dioxide concentra- traffic being on the roads in 2022 will be negligible everywhere other than at this on under this scenario would be moderate adverse. However, bearing in mind that no before 2024, and the development is unlikely to be complete and thus generating if 2030s, this scenario is unrealistically worst-case. Applying professional judgemen that the actual impact of the development at these 8 homes will also be negligible occupation in 2024.
The effects of local traffic on the air quality for future residents living in the propo- shown to be acceptable at the worst-case locations assessed, with concentrations b objectives. As such, the overall operational air quality effects of the development are
The proposed allocation is supported by detailed masterplanning work, including identify a realistic dwelling yield on the site's net developable area. The Transpondent of dwellings the site is expected to deliver. This identifies the various transpondent of the site is expected to deliver.

rface water flood risk is shown. ble and incorporated within the

ed by the new Flood Map for flood risk extents over the next ace. A review of the new Flood erefore considered at low or no

een engaging with Cwm Taf cess. Early meetings were held of facilitate alignment of service rd amongst other consultation suitable for future development ly control provision of primary ed with Cwm Taf Morgannwg cations within the Deposit Plan

ality Assessment to assess the ns arising from the additional ons have been modelled for a are expected to be greatest. In ure residents on the proposed

remain below the objectives at all impacts for these pollutants

objective at all but one existing velopment. However, it is now d before 2024, by which time it objective. The assessment has rations of the full development one receptor, where the impact to new homes will be occupied its full traffic volumes until the ent, it is considered most likely gible in all years from the first

bosed development have been being well below the air quality are judged to be 'not significant

ng an illustrative block plan to sport Assessment reflects the ransport issues relating to the

proposed development, and, in combination with the Strategic Transport Assessin taken to deal with the anticipated transport impacts of the scheme. Proposed appropriate development requirements in relation to all forms of travel. For the a number of dwellings does not require the original proposed site boundary to be exp use of the existing net developable area. The density and mix of uses proposed support a diverse community and vibrant public realm, whilst generating a critical services such as public transport, local shops and schools. In accordance with nat densities should be encouraged in urban centres and near major public transport n 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 co by the proposed enhancements to the active travel network.
The Replacement LDP aims to reduce private car reliance and help the County Bo 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 Acti PLA3 in conjunction with Policy PLA12 should be considered essential in the deliver 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 facil employment sites, retail areas and transport hubs, improved access to education face colleges and improvements to, and expansion of, the existing strategic cycle network Opportunities will be maximised to further improve upon these routes, providing way allow integration between new developments and existing communities.
Whilst developments should be encouraged in locations which reduce the need to the sustainable transport, the Council recognises that any development growth will I demand, and that increased traffic levels and congestion is likely to occur if app measures and infrastructure are not delivered. Therefore a Strategic Transport Ass has been undertaken to consider the impact of plan proposals and help guide delivering land allocations by means of modelling and quantifying the transport impact context the proposed lewithin the LDP can be accommodated within the BCBC Highway Network with suitable to the suitable to the transport of the transport with the suitable to the transport of the transport to the transport.
Furthermore Strategic Policy 5: Sustainable Transport and Accessibility will ensur- located and designed in a way that minimises the need to travel, reduces depend enables sustainable access to employment, education, local services and communi- be required to deliver, or contribute towards the provision of, active travel scheme road infrastructure, and other transport measures, in accordance with the Bridger the Bridgend Integrated Network Plan (See Appendix 29).
Proposed Policy PLA3 prescribes a number of placemaking principles for Land V considered instrumental to achieving sustainable places, delivering socially in promoting cohesive communities. Such requirements include pursuing transit- prioritises walking, cycling and public transport use, whilst reducing private moto designed, safe walking and cycling routes must be incorporated throughout the orientated, healthy walkable neighbourhoods. There will be a clear emphasis on pri cycling linkages along the A473, with Bryntirion Comprehensive School and Bridg the bus station and train station). New connections will be provided to accord with the Council's ATNM: INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58, INM-BR-12

sment, what measures will be d Policy PLA3 prescribes the avoidance of any doubt, this xpanded, rather more efficient d is considered appropriate to cal mass of people to support ational planning policy, higher nodes or interchanges. Given he proximity to Bridgend Town communities, further bolstered

Borough achieve the principles and expanding upon the current ive travel has been key during ctive Routes detailed in Policy ery of any strategic site or any able and healthy lifestyle.

cilities including town centres, facilities such as schools and twork in the County Borough. walking connections which will

b travel and promote the use of I likely result in greater travel opropriate mitigating transport ssessment (See Appendix 36) de and inform the process of mpact of these proposals. The level of development detailed itable mitigation.

ure that development must be ndency on the private car and nity facilities. Development will ne, public transport measures, end Local Transport Plan and

West of Bridgend, which are inclusive developments and t-orientated development that tor vehicle dependency. Wellthe site to foster community providing safe pedestrian and dgend Town Centre (including ith the proposed routes within -127 and 2120. PLA3 will also

		require development to provide a new shared cycle / footway on the northern side site with active travel route INM-BR-57 linking to the shops at Bryntirion to the east the west of the site to provide a connection to the eastbound bus stop on the A473 Policy PLA3 will require on-site highway improvements to ensure the principal achieved from a new signalised junction with the A473 at the southern boundary; the new-shared use crossing to connect the internal cycleway/footway with the existin southern side of the A473. The site promoter's Transport Assessment confirms that the traffic effect of 850 dw order of 269 and 243two-way movements in the AM and PM peak hours respectivel worst case as attitudinal change towards travel progresses. This quantum of trips e per minute two-way, diluted across the local highway network. The assess development provides opportunities to create a new western edge to Bridgend in community facilities suitable for day to-day living. In this way, the transport case for necessary to promote sustainable travel modes before the private vehicle. The the travel planning and the locational advantages, together with the Mobility Strate benefit for existing and new residents, significantly improving travel choice, for social journeys and hence social inclusion. Working from home and from a the Workhub will be encouraged from the outset, in line with Welsh Government's asp
		Furthermore, the Council have prepared a Sustainability Appraisal (SA) to inform Appendix 9) of which was carried out to identify the likely significant environme effects from the Deposit Plan. It also considers whether any mitigation and enhan 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 the pr proposed range of land uses will likely produce a wide range of significant benefici
1097	I am a Chartered Surveyor with over 30 years experience in the residential property market. I write in support of the proposed allocation at West Bridgend which is the product of a comprehensive assessment of the site and its context. The submission of the West Bridgend site for consideration, was accompanied by all the necessary technical reports and found to meet the need to deliver housing in a sustainable location and duly included within the Deposit Consultation Document. This proposed allocation is for open market and affordable housing, together with a community hub and primary school, as well as extensive areas for nature conservation, trim trail, parks and play areas. The obligation of Bridgend to review their LDP has resulted in this current draft which is attracting many representations. They are duty bound to find suitable sites for housing but when they do there is vitriolic opposition. Difficult choices have to be made, housing	Support noted.

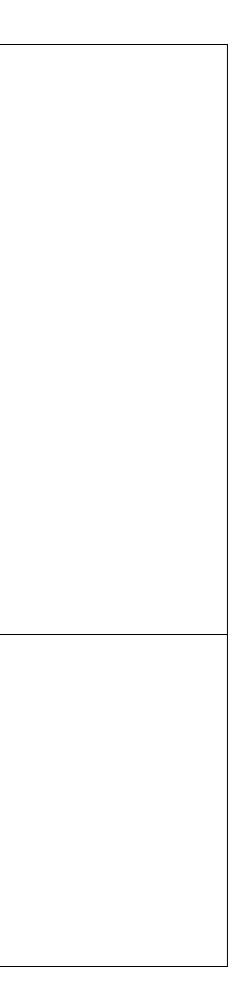
de of the A473, connecting the east, and a widened footway to 73.

al point of vehicular access is ; the junction will accommodate sting active route BRC9b on the

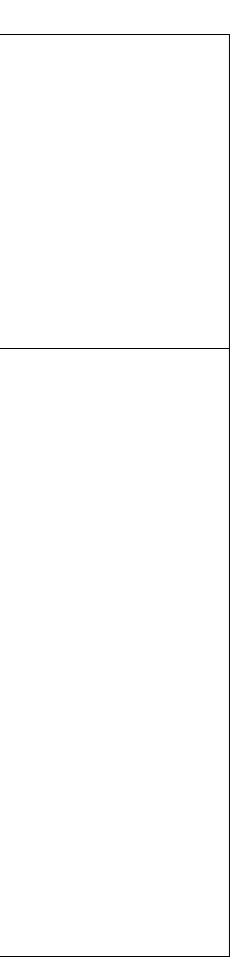
dwellings is forecast to be in the vely, although this is considered s equates to just over 4vehicles ssment concludes that the d in a self-sustaining site offering for mobility provides the options he design of the environment, ategy means there is a major , for commuting, leisure and third-place such as a non-site spirations.

m the Replacement LDP (See nental and wider sustainability ancement measures should be nificant adverse effects and to proposed development with its icial effects.

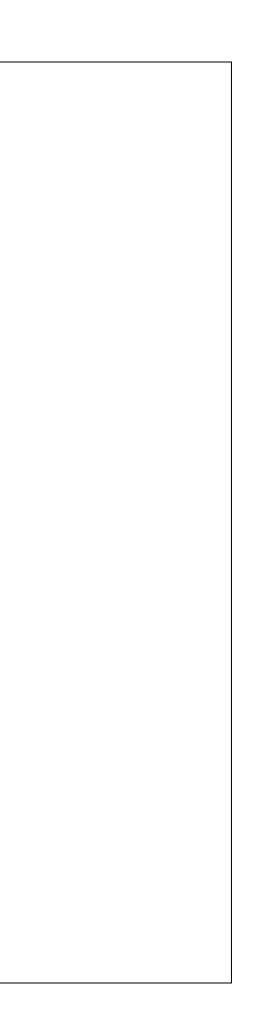
	sites identified and included within the	
	review of the LDP. I have seen sight of the	
	comprehensive submission that has been	
	prepared by Llanmoor and submitted to	
	demonstrate the suitability of the site from	
	all aspects, including transport	
	assessments air and noise reports,	
	consideration of ecology and master	
	planning to mention just a few. Therefore, I	
	am exceedingly concerned to note that local	
	representatives are circulating a template	
	letter of objection suggesting representors	
	object to numerous features of the proposal	
	including the loss of the ancient woodland	
	on site! This is factually incorrect. The	
	ancient woodland and SINC area of the site	
	are protected from development. Other	
	infrastructure, education, air quality,	
	sewage, drainage, health care provision. I	
	would agree that if these factors were not	
	correctly assessed then this or any site	
	should and would not ultimately get a	
	planning allocation or a consent. It is the	
	duty of the professional officers of the	
	council to produce a plan that is sound and	
	identify sites that can be delivered without	
	undue burden to the community or	
	environment. I fully support this well-	
	presented housing allocation which will	
	deliver much needed housing in a	
	sustainable location.	
403	We write as agents for part of the above	Support noted.
	proposed allocation at West Bridgend,	
	which is being promoted by Llanmoor	
	Homes. As a chartered Town Planner, I	
	understand the planning process and the	
	need for the Authority to review the Local	
	Development Plan (LDP). The submission	
	of the West Bridgend site by Llanmoor	
	Homes has followed the appropriate	
	assessment process despite the comments	
	suggesting otherwise. All necessary	
	technical reports have accompanied the	
	submission of this candidate site, and are	
	deemed to comply with the policy	
	requirements. These demonstrate that the	
	site is has the ability to deliver housing	
	together with a primary school, community	
	hub and open space / Green Infrastructure.	
	· · ·	



	In addition, full public access would be		
	provided through the site, which is not		
	currently the case (with the exception of an		
	existing PRoW). Importantly, the site would		
	help deliver over 150+ units for affordable		
	housing. It is with great frustration that I		
	read the letter template being circulated by		
	local councillors in opposition. This		
	objection letter contains many inaccuracies,		
	and raises the question as to whether the		
	supporting documents have been read.		
	There is surely a duty on elected members		
	to take an impartial stance, and to weigh up		
	the facts. We therefore urge officers to take		
	a balanced view of sites for inclusion in the		
	LDP, and base these decisions on material		
	planning considerations.		
1444	I am a local resident and owner of part of	Support for PLA3.	Support noted.
	the Strategic Site, Land West of Bridgend,		
	which is being promoted by Llanmoor		
	Development Co. Ltd. I am aware of		
	Bridgend County Borough Council's		
	(BCBC) need to periodically review their		
	Local Development plan and have some		
	understanding about the planning		
	procedures in place to as part of effectively		
	carrying out this process. It is my		
	understanding that potential sites are		
	identified for all manner of land uses such		
	as housing, community infrastructure, local		
	amenities, retail and of course,		
	employment. All such projects should be		
	devised in a way to effectively meets the		
	needs of future generations of residents in		
	both Bridgend and the immediate area.		
	Accordingly, during my reading into the		
	extensive literature which supports this		
	Plan, I have noticed the significant work that		
	is involved in scrupulously analysing each		
	site. Naturally, this is essential to ensure		
	that key criteria including future housing		
	, , , , , , , , , , , , , , , , , , , ,		
	availability (and affordability), access to		
	good community amenities, environmental		
	benefits such as green spaces are all both		
	improved and remain sustainable for future		
	generations. Indeed, it seems to me that the		
	assessment process of the said site was		
	sound and indeed rigorous, in following the		
	proper assessment process and addressing		
	the important aforementioned		



considerations. Notably, the site will provide 170 units of affordable housing. This is vitally important for our future generations given the dire national shortage and exponentially increasing house prices. Moreover, the economic benefit that comes with employment will help support local businesses and energise the local economy which has long struggled. Excellent community initiatives have been proposed including a new community hub (currently lacking) and a new primary school (currently oversubscribed). Additionally, environmental stewardship and sustainability has been an important aspect of the Plan with acres of green spaces, parks and play areas available. Currently, all land in question is private property. The entire proposal of this candidate site including all detailed technical reports, has gone through the LDP review process, deemed to comply with the necessary requirements and included in the Deposit Consultation Document. Upon reading the content of the template letter being circulated by local councillors in opposition to the Plan, it frustrates me that material planning considerations have not been properly deliberated. I have been told that the location of the housing according to them, is very controversial and that no one wants allocation of extra housing near them. This attitude of 'not in my back yard' is disappointing, especially given that they have long been happy to exercise their dogs across said land often straying beyond designated footpaths. Moreover, the many factual inaccuracies contained within the letter show that the extensive technical reports that have been submitted have not been read despite such councillors having access to all information. Our elected members have a duty to initially take an impartial stance and come to a fair and balanced conclusion after taking into account all of the information provided. The benefits that the inclusion of this site in the Plan are clear for the local community and it is important that these are appreciated by elected members who should refrain from



	inciting anti-development rhetoric. I		
	therefore urge all to take a balanced view of		
	sites for inclusion in the LDP Review and		
	base these choices on facts, sound		
	informed opinions and material planning		
	considerations.		
223	Bridgend Land West of	Support the	Comments noted.
		allocation of Land	
	As previously outlined, Llanmoor support the allocation of Land West of Bridgend as set out in Policy SP1: Regeneration and Sustainable Growth Strategy and Policy SP2: Regeneration Growth Areas, Sustainable Growth Area Strategic Allocations and more specifically place making Policy PLA3: Land West of Bridgend Sustainable Growth Area. The supporting reasons for the allocation are	West of Bridgend for progression within the Replacement LDP.	All allocations have been proposed based on the outcome of the Candidate Site Assi with the National Sustainable Placemaking Outcomes, the Gateway Test applied to and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All are considered to demonstrate delivery in accordance with the requirements set out Manual. All strategic sites key to the delivery of the plan have been subject to greate support their delivery, including schematic frameworks, phasing details, key transpo 10 requirements, design parameters, s106 requirements, infrastructure and costs. The degree of confidence that the sites included within the Deposit Plan are realistically of full plethora of associated development requirements, infrastructure provision an necessary to deliver high-quality new communities.
	Bridgend is the Primary Key Settlement of the County Borough and as such is the most sustainable location for growth which has been substantiated through extensive technical evidence produced as part of the evidence base supporting the emerging replacement Local Development Plan.		
	Llanmoor have been engaged with the Local Plan process from the beginning promoting land to the West of Bridgend through the Council's Candidate Sites exercise. The site has then had to go through rigorous technical analysis and review at each stage of the emerging Plan in accordance with sustainable development and place making principles of Planning Policy Wales (PPW) Edition 11 and Development Plans Manual (DPM) Edition 3, March 2020.		
	The Candidate Sites and Sustainability Appraisal The Candidate Sites and Sustainability Appraisal process are the building blocks to the plan making process required by Welsh Government. The evidence in both these documents clearly sets out why a site has been included or excluded from the LPD. In this context, the Land West of Bridgend was		

Assessment, their compatibility of to the site search sequence a. All new proposed allocations out in the Development Plans eater evidence requirements to asport corridors, critical access a. This process provides a high illy deliverable, considering the m and placemaking principles considered at both stages of the Candidate Site Assessment (Ref. 308.C1) as it is located on the periphery of Bridgend in an identified Sustainable Growth Area.

Llanmoor has submitted a large volume of technical studies to demonstrate the deliverability of the site. The site was initially assessed in the Sustainability Appraisal for the PS which has been updated at each stage of the plan making process to take account of additional submitted evidence. This ensures that a robust and consistent approach is taken to testing the sustainability of each site, an approach which is logical and supported by Llanmoor.

The Bridgend RLDP Deposit Plan Sustainability Appraisal undertaken by Stantec, May 2021 overall identifies that the land west of Bridgend will have greater likely significant beneficial effects than likely significant adverse effects. The two identified likely adverse effects are in relation to: -

- i. SA3e Employment and Skills which requires demonstration of the accessibility of existing secondary education infrastructure to accommodate the development and,
- ii. SA4b to demonstrate the level and acceptability of impacts on the surrounding road network.

In addressing (i), Llanmoor continue to engage with Bridgend County Borough Council Education Department to ensure proportional contributions to the funding of off-site secondary school provision is provided in accordance with the proposed number of residential units developed at the site. A Community Infrastructure sum of £12,665,330.00 has been included in the viability report, £11.35m is allocated for education purposes, including across nursery, primary, secondary and further education.



In terms of (ii), a Transport Assessment, and an Interim Travel Plan, have been produced by Vectos. Whilst it has not been possible to undertake the full survey works required, due to the current COVID lockdown, the assessment confirms that Parc Llangewydd, Land at West Bridgend is a well-located sustainable site taking advantage of the numerous nearby facilities, many of which are located a short distance away from the site within Bryntirion and Broadlands, with greater numbers also located within Bridgend Town Centre.

It is important to note that the existing pedestrian access to the site is retained. The emerging masterplan includes provision for the Laleston Link through the site which forms part of the wider Bridgend Circular Walk Public Right of Way. The enclosed byway with the existing hedgerow corridor will be retained as cross link. In terms of active travel the masterplan retains the existing access points along the boundaries, includes provision for shared foot/cycle routes, an indicative informal path/nature trail to the north as well as a trim/play trail to the west.

Furthermore, the site is accessible via a number of modes of travel and links well to the existing urban boundary to the east. The assessment concludes that the development provides opportunities to create a new western edge to Bridgend in a self-sustaining site offering community facilities suitable for day-to-day living. In this way the transport case for mobility provides the options necessary to promote sustainable travel modes before the private vehicle. The design of the environment, the travel planning and the locational advantages, together with the Mobility Strategy means there is a major benefit for existing and new residents, significantly improving travel choice, for commuting, leisure and social journeys and hence social inclusion.



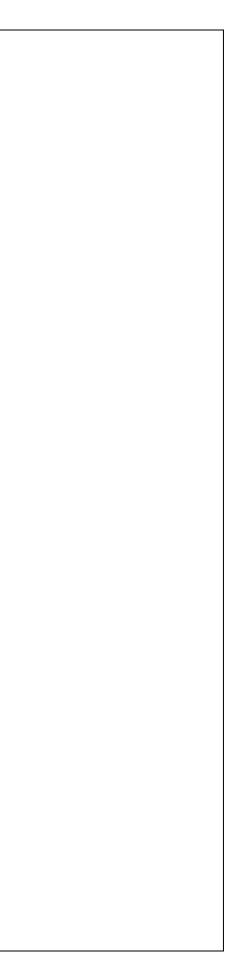
Also, it is proposed to prohibit motor vehicles on Llangewydd Road between Bryntirion and where it joins the lane running north-south through the site (to the west). This will form a green travel corridor between the site and northern Bryntirion, only open to Active Travel and emergency vehicular traffic. The section of lane between the emergency access and Bryntirion will be upgraded in line with the Welsh Government's guidance on Active Travel Design Guidance. The intention is that this section of Llangewydd Road would become a shared footway / cycleway, which emergency vehicles could safely overrun if required to in an emergency. Once in Bryntirion pedestrians would use existing footways and cyclists would proceed along quiet streets to connect with existing Active Travel Routes INM-BR-55 in the east or INM-BR-57 in the south. Llanmoor are aware of the operational capacity issues raised within Appendix 48 -Background Paper 8 – M4 Junction 36 and the delays being encountered to the undertaking of the Strategic Transport Assessment due to the ongoing COVID lockdowns. Llanmoor are committed to further assessment work being undertaken in due course, post COVID restrictions, to demonstrate the acceptability of impacts on the surrounding road network and that there is already sufficient infrastructure to support the proposed urban extension on Land West of Bridgend.

As for air quality, the submitted Air Quality Assessments as prepared by AQC have confirmed that overall, the operational air quality effects of the proposed development are judged to be 'not significant'.

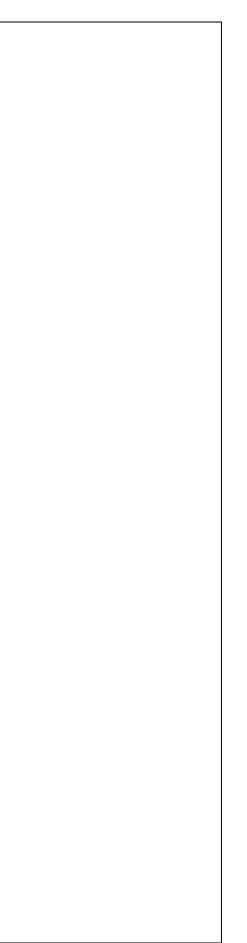
Furthermore, it is AQC's professional judgement that significant impacts are considered unlikely along the A48, through Laleston, and at the proposed development site due to low background and measured concentrations. Also following further assessment it is considered that the actual



	1	
impact of the development at 6-8 properties		
along Park Street, within the AQMA, will		
actually be negligible in all years from the		
first occupation in 2024, and that		
concentrations at these properties will be		
below the objective in those years. Impacts		
elsewhere were all negligible even in the		
worst-case 2022 scenario.		
Settlement Assessment Study		
As part of the Settlement Assessment Study		
undertaken in 2019 and revised in 2021,		
Bridgend overall score is 79 when tested		
against three main principles including:		
i. Sustainable transport and accessibility		
to reduce the need to travel by car,		
ii. Availability of facilities and services to		
consider whether the current provision		
can support the current and future		
population, and		
iii. Employment provision to measure the		
economic sustainability of an area and		
reduce commuting. Bridgend is		
identified as the Primary Key		
Settlement within the County Borough		
which far exceeds any other settlement		
in the matrix and is therefore the		
primary focus for development in the		
hierarchy of settlements. A position that		
Llanmoor agree.		
Local Housing Market Assessment		
The Local Housing Market Assessment		
2021 has followed Welsh Government		
Guidance to identify the annual level of		
housing need across the Bridgend County		
Borough in numeric and spatial terms. The		
LHM is a core baseline evidence document		
which influences the scale, type and		
location of growth within the Replacement		
LDP. The LHMA indicates that the headline		
housing need equates to 5,134 affordable		
housing units from 2018-2033, comprising		
2,839 social rented dwellings and 2,295		
intermediate dwellings. A more balanced		
mix of dwellings new built sites to include		
smaller and more affordable market		
properties was also identified. Llanmoor		
recognise this need and are in a position to		



deliver much needed housing in a sustainable location within the County Borough.	
Viability and Deliverability Significant evidence has been provided by Llanmoor to demonstrate that the land west of Bridgend is deliverable and viable, a fundamental consideration in the development plan process and at the forefront of Welsh Government policy. Llanmoor has been actively engaged regarding viability and evidence has been provided to the Council and been subject to rigorous examination by independent experts who have agreed that the site is sustainable, deliverable and recommended it for inclusion within the emerging LDP Review.	
Furthermore, in terms of deliverability Llanmoor have been in negotiations with the various landowners and their respective agents since October 2018 with can confirm that a Formal Joint - Landowner Agreement was legally exchanged and completed on Friday 9th October 2020.	
As such, Llanmoor now has complete control over the whole of the land within the Allocation through individual landowner Option Agreements which allows the delivery of the whole site in a comprehensive manner.	
With regard to the Housing trajectory set out in Appendix 1 of the DCD and Background Paper 4 Housing Trajectory Llanmoor agree the total site capacity of 850 dwellings and the phased delivery of housing to commence in 2024-2025. Dependent upon the pace at which the LDP progresses, Llanmoor consider that the whole of the development will be completed by the end of the LDP period in 2033 with no overspill beyond the plan period.	
Settlement Boundary As detailed within the Settlement Boundary Review 2021, appropriate boundary	



changes will have to be made to allow for the delivery of the LDP Strategy. In this case, the settlement boundary relating to Bridgend was considered flexibly and whilst Bridgend is defined as an area of growth it is constrained by the capacity of Junction 36 of the M4. This directly informs the location of sustainable growth within settlements, with a focus on those areas that can provide sustainable travel options and where increased traffic options will not add to the capacity issues of Junction 36. Llanmoor agree with the Councils own assessment that the settlement boundary is proposed to be altered to extend around the site to reflect the emerging allocation, a position which Llanmoor supports in strengthening Bridgend's role as the Primary Key Settlement within the County Borough. Furthermore, the revised settlement boundary will prohibit further greenfield development to the south north and west.

## Agricultural Land Quality

Appendix 55 - Background Paper 15 - The Best and Most Versatile Agricultural Land confirms that the proposed strategic development of land West of Bridgend includes agricultural land of Subgrade 3b and Grades 4 and 5. This is confirmed by the submitted statement by Kernon Countryside Consultants Ltd. It would not result in the loss of any BMV agricultural land. In accordance with the Welsh Government Guidance Note (November 2017) that accompanies the Predictive Agricultural Land Classification Map (Wales) 'planning applications and Local Development Plans are expected to be supported by survey evidence where Best and Most Versatile (BMV) agricultural land is an issue for consideration'.

However, the Survey Decision Flowchart within the Welsh Government Guidance Note shows that, where land is Grades 3b, 4 and 5 then no survey is required. Therefore, it is concluded that the Allocation would not impact upon land which is of BMV quality.



## Ecology

As highlighted by the Authority, a comprehensive desk study and extended Phase 1 survey were undertaken at the site to support the candidate site submission, as well as a further Ecological Briefing Note and Habitat Assessment Summary Note. It is considered that these are more than adequate for the current assessment, and that any further detailed assessments would accompany a planning application.

The Phase 1 survey concluded that the site is dominated by agriculturally improved grassland of limited botanical interest and thus of low inherent ecological value. Though, habitats of greatest ecological importance do include the native hedgerows delineating the northern boundary and internal field boundaries in addition to woodland habitat and marshy grassland associated with Laleston Meadows SINC, the vast majority of which are shown to remain in the emerging masterplan.

The Habitat Assessment Summary Note included a DAFOR level botanical survey to assess the botanical interest of Laleston Meadows SINC. This was also then supported by a further Ecological Briefing Note. Both reports notes that the SINC encompasses four distinct grassland areas divided by scrub, broadleaved woodland and relict hedgerows. Each of these areas was assessed further, with the two eastern fields being more species rich and of high botanical value, whilst the north-western field is relatively species poor.

As such, the masterplan proposal seeks to maintain biodiversity across the SINC, particularly the two eastern fields of greater botanical value, which will predominantly be managed for wildlife and biodiversity with restricted public access, albeit allowing for the continued use of the existing public rights of ways (PRoW) in this area. However, the two western fields provide



opportunities for the provision of informal public open space focused across those areas of lower botanical interest, whilst also providing opportunities for the enhancement and sensitive management of habitat features (including scrub control and removal of undesirable species) to maximise biodiversity and ensure the longterm condition of the SINC is maintained.

It is noted within Appendix 35 – Site of Importance for Nature Conservation (SINC) Review 2020 that further survey work is recommended during the Summer months to assess how floral diversity of the meadow may have changed since previous survey work. In any event, Llanmoor are committed to further detailed habitat and species surveys to inform a planning application and ensure proposed mitigation is appropriate and proportional.

## Green Wedge

The Council's Green Wedge Review, 2021 indicates that the land west of Bridgend is currently located within a Green Wedge as identified within the extant LDP. However, the current DCD and council evidence considers that the land at West Bridgend is identified as making an important contribution to meeting the housing need for the County Borough over the next plan period and is able to provide significant new green infrastructure. The Review considers that whilst LDP Policy ENV2: Development in Green Wedges has been successfully used for its primary objective of preventing coalescence, other policies contained within the extant LDP, particularly ENV1: Development in the Countryside, have also been successful in preventing coalescence.

The Review recommends that as there are policy mechanisms included within the Deposit Plan 2018- 2033 which define settlement boundaries and policies strictly controlling development in the countryside, open space, biodiversity, landscape and the environment whilst also allocating sufficient land for housing within the replacement



LDP – Deposit Plan that it is not necessary to take forward the green wedge police into the Replacement LDP.

Llanmoor agree that the Green Wedge policy has served its purpose and that there are sufficient new policy mechanisms coming through in the Replacement LDP whilst also enabling the sustainable delivery of new homes at Bridgend.

## Green Infrastructure

The Green Infrastructure Assessment 2021 provides a baseline of Bridgend's Green Infrastructure (GI) assets and takes a proactive approach to the management enhancement of assets including those associated with the proposed growth identified in the Replacement LDP.

In terms of the land west of Bridgend the Assessment has identified a number of options which will be considered as part of the GI design. The assessment recognises that the site will provide new areas of public open space comprising seven key areas of formal open space (including equipped play provision), informal spaces and linkages, green streets, and explore the provision of enabling sensitive public access to part of Laleston Meadows SINC and woodland.

This is supported by the master planning works which have resulted in 7.82ha of natural/semi natural areas for nature conservation, new wetland habitat, SUDS and informal green space for people to experience nature. This is supported by 2.1ha of children's play space, Informal amenity space, as well as 2.87ha of green infrastructure, including green Streets and amenity green space. Also, in accordance with the conclusions of the GI Assessment, Llanmoor will be submitting a GI Statement as part of a future planning application which will demonstrate how GI has been a primary consideration in the design of the evolving masterplan.



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	A Landscape and Visual Appraisal has		
	been undertaken to inform the design		
	evolution of the scheme and enabled an		
	integrated approach to potential landscape		
	and visual opportunities and constraints.		
	Overall is it considered that the masterplan		
	framework proposed for the site has been		
	sensitively designed through a landscape		
	and ecology-led approach, with appropriate		
	incorporation of mitigation measures in		
	order to address concerns of the site in		
	relation to landscape and visual matters. As		
	such, the promotion of this site for		
	residential development should be		
	considered an acceptable extension to the		
	existing settlement of Bryntirion which		
	would not cause significant or wide-ranging		
	adverse effects upon its surrounding		
	landscape context.		
	Conclusion		
	In light of the technical findings set out		
	above, it is therefore clear that the DCD has		
	been prepared in accordance with Welsh		
	Government guidance set out within PPW		
	and the DPM. Significant technical and		
	viability evidence has been provided by		
	Llanmoor to demonstrate the proposal is		
	sustainable, deliverable and viable at each		
	stage of the plan process. Therefore,		
	Llanmoor standby their previous		
	submissions and continue to support the		
	allocation of land west of Bridgend as the		
	right location for an urban extension within		
	the Bridgend Sustainable Growth Area		
	which should be progressed to the		
	Replacement LDP adoption.		
	Land South of Bridgend (Island Farm)		
	Llanmoor do not question the allocation of	Change to	As documented in the Candidate Site Assessment, the Land South of Bridgend (Isla
	housing numbers to Bridgend, as the	housing trajectory	robustly demonstrated delivery in accordance with the requirements set out in the D
	Primary Key Settlement within the County	for Land South of	A detailed plethora of evidence has been provided to the Council to support its delive
	Borough. It is noted that the site was subject	Bridgend (Island	investigations and appraisals, masterplans, a viability assessment, a transp
	to further assessment as part of Stage 2 of	Farm)	consideration of s106 requirements, infrastructure and costs. This process has
	the Candidate Site Assessment Report	, ,	confidence that the site is realistically deliverable, considering the full plethora
	2021 (Candidate Site Ref. PS.1) where it		requirements, infrastructure provision and placemaking principles necessary to
	was considered to have potential to provide		communities. The related housing trajectory was prepared initially through close d
	a new primary school and accommodate		site-promoters, followed by effective collaboration and involvement with a range of sta
-		•	

Island Farm) site promoter has e Development Plans Manual. elivery, including numerous site hsport assessment and due as provided a high degree of ra of associated development v to deliver high-quality new e dialogue with the respective f stakeholders at a Stakeholder

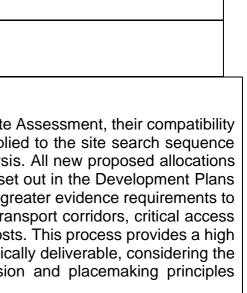
the relocation of Heronsbridge Special Educational Needs School in addition to	Group Meeting. As documented within the Housing Trajectory Background Paper, matters of disagreement on the completion figures or the timing and phasing of sites
providing up to 850 homes.	those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land South of Bridgend (Island
Whilst the site is considered to be free of	unsubstantiated and not supported.
any significant constraints noted within the	
Candidate Site Assessment and the Full	
Sustainability Appraisal of the DCD, and the	
site has an emerging allocation for mixed	
use scheme including residential,	
education, commercial and leisure uses in	
the Deposit Plan under emerging	
placemaking Policy PLA2, a number of	
concerns in respect of deliverability remain.	
Llanmoor are aware of the fall-back position	
in respect of the outline permission (Ref.	
P/08/1114/OUT) for a mixed-use	
development comprising sport / leisure /	
commercial and office uses and subsequent	
Reserved Matters approvals (Ref.	
P/14/354/RES and P/14/824/RES) which	
have lawfully commenced but not been	
completed. The stalled delivery of the	
existing permissions on site raises	
questions as to whether the site is viable	
and deliverable, as the mixed use scheme	
with planning permission since 2014 has	
not been fully implemented.	
It is also understood that the County	
Borough Council has a ransom strip on the	
site which is a constraint that regularly	
prevents or delays sites from being	
delivered which could affect the housing	
trajectory. Llanmoor are not aware of a	
residential developer being engaged in the	
site promotion and the sites potential to	
deliver 850 residential dwellings in the	
Replacement LDP period is questioned and	
considered ambitious given the track record	
of failing to deliver existing permissions. As	
a consequence Llanmoor considers the	
housing trajectory provided in both the DCD	
and Appendix 44 Background Paper 4 to be	
optimistic given the history of the site and	
potential difficulties of overcoming the	
ransom and then allowing sufficient time to	
market and sell the site to a developer and	
obtain planning permission. At present the	
trajectory shows completions in 2025-2026	

er, there were no outstanding es in the plan period (including usion of the Stakeholder Group and Farm) trajectory is both

and it is considered that this should be moved back to 2027-2028.	
Land East of Pencoed	
Llanmoor have no objection to the principle of residential development at Pencoed College Campus, but remain cautious about the number of units proposed and the rate of delivery set out in the housing trajectory. Llanmoor are not aware of a housing developer being on board to take the site forward and as such do not consider sufficient time has been allowed for the disposal of land for the vendor to achieve the relevant planning consents to enable the first housing completions in 2025. Furthermore, a review of baseline evidence documents found there is potential for likely significant adverse effects to archaeology within The Full Sustainability Appraisal of the Deposit Plan. Specifically, the Site of 18th century house, farm, estate and managed landscape boundaries as on Tithe Map. There are also remnant planted avenues, a medieval settlement nearby, water management and milling. The Candidate Site Assessment Report 2021 identifies the need for flood mitigation and a required easement of a high-pressure gas main that traverses the site. It is also noted that Appendix 1 of the Infrastructure Delivery Plan 2021 sets out the infrastructure necessary to support the delivery of strategic sites. In terms of the land east of Pencoed, focusing purely on transport infrastructure, there are a number of elements with unknown costs. The main point Llanmoor highlight at this stage is that unknown costs can hinder the viability and deliverability of development. It is noted that the intended phasing/delivery period for development is 2023-2028, however it is questionable whether this is achievable when there appear to be several unknowns relating to the delivery of infrastructure.	As documented in the Candidate Site Assessment, the Land East of Pencoed s demonstrated delivery in accordance with the requirements set out in the Developmer plethora of evidence has been provided to the Council to support its delivery, investigations and appraisals, masterplans, a viability assessment, a transpc consideration of s106 requirements, infrastructure and costs. This process has p confidence that the site is realistically deliverable, considering the full plethora of requirements, infrastructure provision and placemaking principles necessary to communities. The related housing trajectory was prepared initially through close dit site-promoters, followed by effective collaboration and involvement with a range of stat Group Meeting. As documented within the Housing Trajectory Background Paper, 1 matters of disagreement on the completion figures or the timing and phasing of sites it those sites with planning permission and new housing allocations) following conclusion Meeting. As such, the proposed change to Land East of Pencoed trajectory is bott supported.

d site promoter has robustly nent Plans Manual. A detailed ery, including numerous site sport assessment and due s provided a high degree of a of associated development to deliver high-quality new e dialogue with the respective stakeholders at a Stakeholder er, there were no outstanding es in the plan period (including sion of the Stakeholder Group both unsubstantiated and not

	In light of the survey work required for archaeology and transport, factoring the timescales for the RLDP examination and considering the knock consequences the COVID lockdowns are having especially for traffic data to inform Transport Assessments to support relevant planning applications, it is considered highly unlikely that the first tranche of housing would commence in 2023. It is considered more realistic for the first tranche of housing to commence in 2027-28.		
254	No specific comments to make.	No changes	Comments noted
287	Support - please see covering letter submitted	No changes proposed - support	Comments noted
308	<ul> <li>Bridgend Land West of As previously outlined, Llanmoor support the allocation of Land West of Bridgend as set out in Policy SP1: Regeneration and Sustainable Growth Strategy and Policy SP2: Regeneration Growth Areas, Sustainable Growth Area Strategic Allocations and more specifically place making Policy PLA3: Land West of Bridgend Sustainable Growth Area. The supporting reasons for the allocation are self-evident and are as follows: Bridgend is the Primary Key Settlement of the County Borough and as such is the most sustainable location for growth, which has been substantiated through extensive technical evidence produced as part of the evidence base supporting the emerging replacement Local Development Plan. Llanmoor have been engaged with the Local Plan process from the beginning promoting land to the West of Bridgend through the Council's Candidate Sites exercise. The site has been through a rigorous technical analysis and review at each stage of the emerging Plan in accordance with sustainable development Plans Manual (DPM) Edition 3, March 2020. </li> </ul>	No changes proposed. Continue to support the allocation of Lan West of Bridgen for progression within the Replacement LDP.	d are considered to demonstrate delivery in accordance with the requirements set



The Candidate Sites and Sustainability Appraisal process are the building blocks to the plan making process required by Welsh Government. The evidence in both these documents clearly sets out why a site has been included or excluded from the LPD. In this context, the Land West of Bridgend was considered at both stages of the Candidate Site Assessment (Ref. 308.C1) as it is located on the periphery of Bridgend in an identified Sustainable Growth Area.

The Llanmoor consultants have submitted a large volume of technical studies to demonstrate the deliverability of the site. The site was initially assessed in the Sustainability Appraisal for the PS which has been updated at each stage of the plan making process to take account of additional submitted evidence. This ensures that a robust and consistent approach is taken to testing the sustainability of each site, an approach which is logical and supported by Llanmoor.

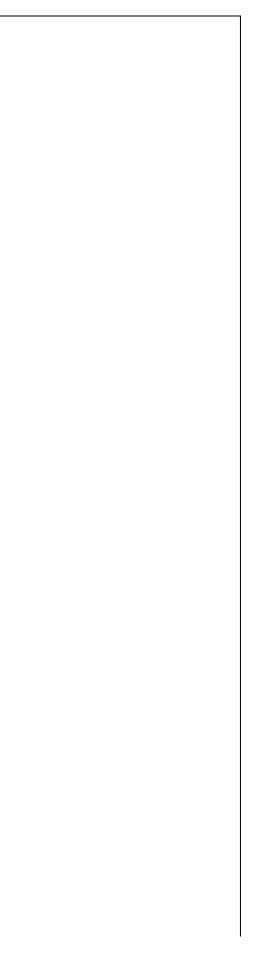
The Bridgend RLDP Deposit Plan Sustainability Appraisal undertaken by Stantec, May 2021 overall identifies that the land west of Bridgend will have greater likely significant beneficial effects than likely significant adverse effects. The two identified likely adverse effects are in relation to:-

- iii. SA3e Employment and Skills which requires demonstration of the accessibility of existing secondary education infrastructure to accommodate the development and,
- iv. SA4b to demonstrate the level and acceptability of impacts on the surrounding road network.

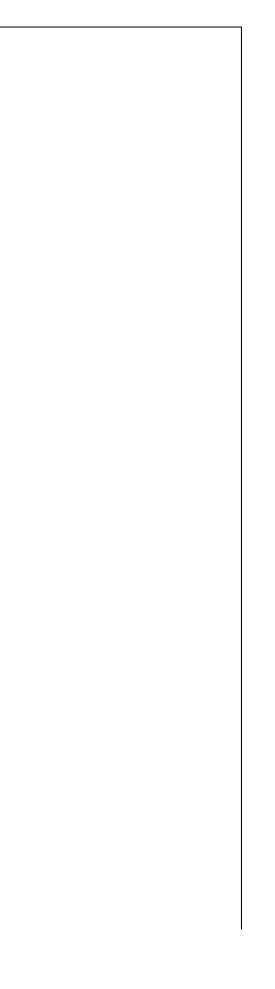
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site. A Community Infrastructure sum of £12,665,330.00 has been included in the viability report, £11.35m is allocated for education purposes, including across nursery, primary, secondary and further.		
In terms of (ii), a Transport Assessment, and an Interim Travel Plan, have been produced by Vectos. Whilst it has not been possible to undertake the full survey works required, due to the current COVID lockdown, the assessment confirms that Parc Llangewydd, Land at West Bridgend is a well-located sustainable site taking advantage of the numerous nearby facilities, many of which are located a short distance away from the site within Bryntirion and Broadlands, with greater numbers also located within Bridgend Town Centre.		
The emerging masterplan includes numerous points of public access including the Laleston Link through the site which forms part of the wider Bridgend Circular Walk Public Right of Way. The proposed masterplan retains the existing access points along the boundaries, includes provision for shared foot/cycle routes, an indicative informal path/nature trail to the north as well as a trim/play trail to the west thus maintaining active travel connections.		
The site is also accessible via a number of modes of travel and links well to the existing urban boundary to the east. The assessment concludes that the development provides opportunities to create a new western edge to Bridgend in a self-sustaining site, offering community facilities suitable for day-to-day living. In this way the transport case for mobility provides the options necessary to promote sustainable travel modes before the private vehicle.		
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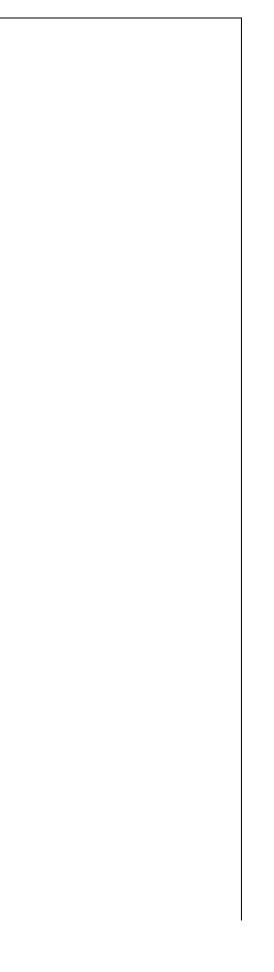


Bridgend is identified as the Primary Key Settlement within the County Borough which far exceeds any other settlement in the matrix and is therefore the primary focus for development in the hierarchy of settlements. Local Housing Market Assessment The Local Housing Market Assessment 2021 has followed Welsh Government Guidance to identify the annual level of housing need across the Bridgend County Borough in numeric and spatial terms. The LHM is a core baseline evidence document which influences the scale, type and location of growth within the Replacement LDP. The LHMA indicates that the headline housing need equates to 5,134 affordable housing units from 2018-2033, comprising 2,839 social rented dwellings and 2,295 intermediate dwellings. Llanmoor recognise this need and are in a position to deliver much needed housing in a sustainable location within the County Borough. Viability and Deliverability Significant evidence has been provided by Llanmoor to demonstrate that the land west of Bridgend is deliverable and viable, a fundamental consideration in the development plan process and at the forefront of Welsh Government policy. Llanmoor has been actively engaged in the viability process, with evidence provided to the Council. This has been subject to rigorous examination by independent experts who have agreed that the site is sustainable, deliverable and recommended it for inclusion within the emerging LDP Review. Llanmoor can confirm that a Formal Joint -Landowner Agreement has been legally exchanged and completed, dated 9th October 2020. As such, Llanmoor now has control over the whole of the land within the Allocation through individual landowner Option Agreements which allows the delivery of the site in a comprehensive manner.

Furthermore, the Housing trajectory for the site set out in Appendix 1 of the DCD and Background Paper 4 Housing Trajectory, is



agreed, and the total site capacity of 850			
dwellings and the phased delivery of housing			
commencing in 2024-2025 can be delivered.			
Llanmoor further consider that the whole of			
the development will be completed by the			
end of the LDP period in 2033 with no			
anticipated overspill beyond the plan period.			
Settlement Boundary			
As detailed within the Settlement Boundary			
Review 2021, appropriate boundary changes			
will have to be made to allow for the delivery			
of the LDP Strategy. In this case, the			
settlement boundary relating to Bridgend was			
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Best and Most Versatile Agricultural Land			
confirms that the proposed strategic			
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includes agricultural land of Subgrade 3b and			
Grades 4 and 5. This is confirmed by the			
submitted statement by Kernon Countryside			
Consultants Ltd. It would not result in the loss			
of any BMV agricultural land. In accordance			
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(November 2017) that accompanies the			
Predictive Agricultural Land Classification			
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	I		



and Most Versatile (BMV) agricultural land is an issue for consideration'.

#### Ecology

As highlighted by the Authority, a comprehensive desk study and extended Phase 1 survey were undertaken at the site to support the candidate site submission, as well as a further Ecological Briefing Note and Habitat Assessment Summary Note. It is considered that these are more than adequate for the current assessment, and that any further detailed assessments would accompany a planning application.

The Phase 1 survey concluded that the site is dominated by agriculturally improved grassland of limited botanical interest and thus of low inherent ecological value. Though, habitats of greatest ecological importance do include the native hedgerows delineating the northern boundary and internal field boundaries in addition to woodland habitat and marshy grassland associated with Laleston Meadows SINC.

The Habitat Assessment Summary Note included a DAFOR level botanical survey to assess the botanical interest of Laleston Meadows SINC. This was also then supported by a further Ecological Briefing Note. Both reports notes that the SINC encompasses four distinct grassland areas divided by scrub, broadleaved woodland and relict hedgerows. The masterplan proposal seeks to maintain biodiversity across the SINC, particularly the two eastern fields of greater botanical value, which will predominantly be managed for wildlife and biodiversity with restricted public access, albeit allowing for the continued use of the existing public rights of ways (PRoW) in this area. However, the two western fields provide opportunities for the provision of informal public open space focused across those areas of lower botanical interest, whilst also providing opportunities for the enhancement and sensitive management of habitat features (including scrub control and removal of undesirable species) to maximise



biodiversity and ensure the long term condition of the SINC is maintained.

### Green Wedge

The Council's Green Wedge Review, 2021 indicates that the land west of Bridgend is currently located within a Green Wedge as identified within the extant LDP. However, the current DCD and council evidence considers that the land at West Bridgend is identified as making an important contribution to meeting the housing need for the County Borough over the next plan period and is able to provide significant new green infrastructure. The Review considers that whilst LDP Policy ENV2: Development in Green Wedges has been successfully used for its primary objective of preventing coalescence, other policies contained within the extant LDP, particularly ENV1: Development in the Countryside, have also been successful in preventing coalescence.

The Review recommends that as there are policy mechanisms included within the Deposit Plan 2018- 2033 which define settlement boundaries and policies strictly controlling development in the countryside, open space, biodiversity, landscape and the environment whilst also allocating sufficient land for housing within the replacement LDP – Deposit Plan that it is not necessary to take forward the green wedge policy into the Replacement LDP.

Llanmoor agree that the Green Wedge policy has served its purpose and that there are sufficient new policy mechanisms coming through in the Replacement LDP whilst also enabling the sustainable delivery of new homes at Bridgend.

### Green Infrastructure

The Green Infrastructure Assessment 2021 provides a baseline of Bridgend's Green Infrastructure (GI) assets and takes a proactive approach to the management enhancement of assets including those associated with the proposed growth identified in the Replacement LDP.



In terms of the land west of Bridgend the Assessment has identified a number of options which will be considered as part of the GI design. The assessment recognises that the site will provide new areas of public open space across the site comprising seven key areas of formal open space (including equipped play provision), informal spaces and linkages, green streets, and explore the provision of enabling sensitive public access to part of Laleston Meadows SINC and woodland.

This is supported by the master planning works which have resulted in 7.82ha of natural/semi natural areas for nature conservation, new wetland habitat, SUDS and informal green space for people to experience nature. This is further supported by 2.1ha of children's play space, Informal amenity space, as well as 2.87ha of green infrastructure, including green streets and amenity green space.

A Landscape and Visual Appraisal has been undertaken to inform the design evolution of the scheme and enabled an integrated approach to potential landscape and visual opportunities and constraints. Overall is it considered that the masterplan framework proposed for the site has been sensitively designed through a landscape and ecologyled approach, with appropriate incorporation of mitigation measures to address concerns in relation to landscape and visual matters. As such, the promotion of this site for residential development should be considered an acceptable extension to the existing settlement of Bryntirion which would not cause significant or wide-ranging adverse effects upon its surrounding landscape context.

### Conclusion

In light of the technical findings above, it is clear that the DCD has been prepared in accordance with Welsh Government guidance set out within PPW and the DPM. Significant technical and viability evidence



<ul> <li>housing numbers in Bridgend, as the Primary Key Settlement within the County Borough. It is noted that this site was subject to further assessment as part of Stage 2 of the Candidate Site Assessment Report 2021 (Candidate Site Ref. PS.1) where it was considered to have potential to provide a new primary school and accommodate the relocation of Heronsbridge Special Educational Needs School in addition to providing up to 850 homes.</li> <li>Whilst the site is considered to be free of any significant constraints noted within the Candidate Site Assessment and the Full Sustainability Appraisal of the DCD, and the site has an emerging placemaking Policy PLA2, a number of concerns remain in respect of the outline permission (Ref. P//08/1114/UUT) for a mixed-use development compressing sport/leisure/commercial and office uses and subsequent Reserved Matters approvals</li> </ul>			
Lianmoor do not question the allocation of housing numbers in Bridgend, as the Primary Key Settlement within the County Borough. It is noted that this site was subject to further assessment as part of Stage 2 of the Candidate Site Assessment Report 2021 (Candidate Site Assessment Report 202	demonstrate the proposal is sustainable, deliverable and viable at each stage of the plan process. Llanmoor standby their previous submissions and continue to support the allocation of land west of Bridgend as the right location for an urban extension within the Bridgend Sustainable Growth Area which should be progressed to		
which have lawfully commenced, but not been completed. The stalled delivery of the existing permissions on site raises questions as to whether the site is viable and deliverable, as the mixed use scheme with planning permission since 2014 has not been fully implemented.	Llanmoor do not question the allocation of housing numbers in Bridgend, as the Primary Key Settlement within the County Borough. It is noted that this site was subject to further assessment as part of Stage 2 of the Candidate Site Assessment Report 2021 (Candidate Site Ref. PS.1) where it was considered to have potential to provide a new primary school and accommodate the relocation of Heronsbridge Special Educational Needs School in addition to providing up to 850 homes. Whilst the site is considered to be free of any significant constraints noted within the Candidate Site Assessment and the Full Sustainability Appraisal of the DCD, and the site has an emerging allocation for a mixed use scheme including residential, education, commercial and leisure uses in the Deposit Plan, under emerging placemaking Policy PLA2, a number of concerns remain in respect of deliverability. The fall-back position of this site is well documented, in respect of the outline permission (Ref. P/08/1114/OUT) for a mixed-use development comprising sport/leisure/commercial and office uses and subsequent Reserved Matters approvals (Ref. P/14/354/RES and P/14/824/RES) which have lawfully commenced, but not been completed. The stalled delivery of the existing permissions on site raises questions as to whether the site is viable and deliverable, as the mixed use scheme with planning permission since 2014 has not been	housing trajectory for Land South of Bridgend (Island Farm)	As documented in the Candidate Site Assessment, the Land South of Bridgend (Is robustly demonstrated delivery in accordance with the requirements set out in the A detailed plethora of evidence has been provided to the Council to support its del investigations and appraisals, masterplans, a viability assessment, a tran consideration of s106 requirements, infrastructure and costs. This process ha confidence that the site is realistically deliverable, considering the full plethor: requirements, infrastructure provision and placemaking principles necessary communities. The related housing trajectory was prepared initially through close site-promoters, followed by effective collaboration and involvement with a range of Group Meeting. As documented within the Housing Trajectory Background Pap- matters of disagreement on the completion figures or the timing and phasing of site those sites with planning permission and new housing allocations) following conclu Meeting. As such, the proposed change to Land South of Bridgend (Isla unsubstantiated and not supported.

d (Island Farm) site promoter has the Development Plans Manual. delivery, including numerous site ransport assessment and due has provided a high degree of nora of associated development ary to deliver high-quality new ose dialogue with the respective of stakeholders at a Stakeholder Paper, there were no outstanding sites in the plan period (including nclusion of the Stakeholder Group sland Farm) trajectory is both Llanmoor are not aware of a residential developer being engaged in the site promotion and the sites potential to deliver 850 residential dwellings in the Replacement LDP period is questioned and considered ambitious given the track record of failing to deliver existing permissions. As a consequence we consider the housing trajectory provided in both the DCD and Appendix 44 Background Paper 4 to be optimistic given the history of the site and potential difficulties of overcoming a potential ransom and then allowing sufficient time to market and sell the site to a developer who must then obtain planning permission. At present the trajectory shows completions in 2025-2026 and it is considered that this should be moved back to 2027-2028.

## Land East of Pencoed

Llanmoor have no objection to the principle of residential development at Pencoed College Campus, but remain cautious about the number of units proposed and the delivery rate set out in the housing trajectory. Llanmoor are not aware of a housing developer being on board to take the site forward and as such do not consider sufficient time has been allowed for the disposal of land and for the vendor to achieve the relevant planning consents to enable the first housing completions in 2025.

The Candidate Site Assessment Report 2021 identifies the need for flood mitigation and a required easement of a high pressure gas main that traverses the site. It is also noted that Appendix 1 of the Infrastructure Delivery Plan 2021, sets out the infrastructure necessary to support the delivery of strategic sites. In terms of the land east of Pencoed, focusing purely on transport infrastructure, there are a number of elements with unknown costs. The main point Llanmoor wish to highlight at this stage, is that unknown costs can hinder the viability and deliverability of a development. It is noted that the intended phasing/delivery period for development is 2023-2028, however it is questionable whether this is achievable when

Change to housing trajectory for Land East of Pencoed

As documented in the Candidate Site Assessment, the Land East of Pencoed site promoter has robustly demonstrated delivery in accordance with the requirements set out in the Development Plans Manual. A detailed plethora of evidence has been provided to the Council to support its delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. The related housing trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting. As such, the proposed change to Land East of Pencoed trajectory is both unsubstantiated and not supported.

253	<ul> <li>there appear to be several unknowns relating to the delivery of infrastructure.</li> <li>In light of the survey work required for archaeology and transport, factoring the timescales for the RLDP examination and considering the knock on consequences the COVID lockdowns are having, especially for traffic data to inform Transport Assessments to support relevant planning applications, it is considered highly unlikely that the first tranche of housing would commence in 2023. It is considered more realistic for the first tranche of housing to commence in 2027-28.</li> <li>Land West of Bridgend – BDW has concerns over the proposed allocation of this strategic site. The LPA considers the site is accessible to public transport allowing for connectivity to the town centre and is in a sustainable location on the periphery of Bridgend. The LPA further considers that there are no environmental or deliverability constraints, however, we strongly disagree. It includes a SINC and contains a Schedule Ancient Monument (SAM) and there is an overhead line crossing the northern part of the site with pylons and parts of the site are very steep. Any proposals for this site would therefore need to have due regard to these constraints. The whole of the southern part of the site,</li> </ul>	De-allocate Land West of Bridgend	requirements, infrastructure provision and placemaking principles necessary communities. The related housing trajectory was prepared initially through close site-promoters, followed by effective collaboration and involvement with a range of
	location on the periphery of Bridgend. The LPA further considers that there are no environmental or deliverability constraints, however, we strongly disagree. It includes a SINC and contains a Schedule Ancient Monument (SAM) and there is an overhead line crossing the northern part of the site with pylons and parts of the site are very steep. Any proposals for this site would therefore need to have due regard to these constraints.		confidence that the site is realistically deliverable, considering the full plethor requirements, infrastructure provision and placemaking principles necessary communities. The related housing trajectory was prepared initially through closs site-promoters, followed by effective collaboration and involvement with a range of Group Meeting. As such, the proposal to remove Land West of Bridgend from

Igend site promoter has robustly lopment Plans Manual. A detailed the site, including numerous site transport assessment and due a has provided a high degree of hora of associated development ary to deliver high-quality new lose dialogue with the respective e of stakeholders at a Stakeholder rom the Replacement LDP is not

		1	
	this reason, this site is not considered		
	appropriate for the scale of development		
	proposed.		
	Parc Afon Ewenni, Bridgend – BDW is	u u u	In terms of Parc Afon Ewenni, the Council has now removed the site from the house
	concerned that there is no confirmation that		and subsequent uncertainty relating to delivery timescales. The Candidate Site A
	an end user is in place in the form of a	for Parc Afon	been updated to reflect this constraint, of which states that 'the site is located with
	residential developer to deliver the quantum	Ewenni, Bridgend	Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). T
	of development proposed within the Plan		allocation from the existing LDP (REG1(6)) and is proposed to be developed for
	period. It comprises an historic allocation		uses. However, the Council's Strategic Flood Consequences Assessment identif
	within the adopted LDP which is proposed to		vulnerable to flood risk. As such, the site will not therefore be allocated for dev
	be 'rolled' forward by Bridgend CBC. The site		LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewenni due to
	has not delivered in the current LDP plan		timescales as a result of flood risk.
	period and BDW stress that the delivery and		
	viability of this site needs to be carefully		Nevertheless, an appropriate flexibility allowance (10%) has been embedded into
	considered (in light of this poor track record).		for which is clearly set out in the Housing Trajectory Background Paper. The flexit
	The central part of this site has outline		fact that there may be certain specific circumstances, unknown at the plan making
	consent, granted in March 2018, for		of sites, notwithstanding the robust frontloading of site delivery evidence. This is
	approximately 240 units. However, the		chosen specifically to enable the Replacement LDP's housing requirement to rem
	viability of this consent is questionable due to		the event that a strategic site fails to come forward as anticipated at this point of
	the level of contamination at the site and		flexibility allowance, the Anticipated Annual Build Rate (AABR) will remain delivera
	landowner expectation on value. For the		even if a significant unforeseen scenario, such as non-delivery of a strategic site,
	other two parcels of land which make up this		
	site the land ownership issues have been		
	resolved so they are now wholly within the		
	ownership of South Wales Police and		
	Bridgend CBC. As for the remainder of the		
	site, it is acknowledged that the previously		
	developed nature of the site and the need to		
	provide highway works and education		
	facilities to strengthen the sustainability		
	credentials of this isolated site present viability issues that will need to be addressed.		
	The deliverability of the wider site is therefore		
	questionable. The Council estimate in the		
	trajectory that residential completions will		
	start coming forward on this site by 2024		
	which is considered to be very ambitious.		
	The Site is also crossed by one of National		
	Grid's high voltage overhead electricity		
	transmission lines which will need to be		
	retained in-situ. The development of the site		
	would need to take into account this		
	constraint.		
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ousing trajectory due to flood risk te Assessment (2022) report has within the settlement boundary of ). The site represents a 'Rollover' d for commercial and residential ntifies that the site is significantly development in the Replacement to the uncertainty over delivery

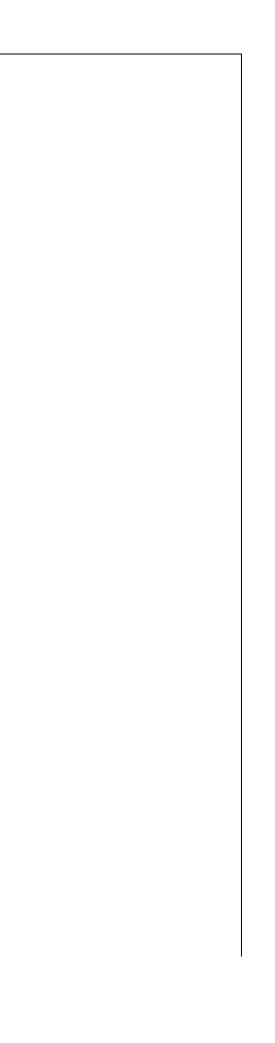
to the Deposit Plan and the basis exibility allowance recognises the king stage, that delay the delivery is is a large flexibility allowance, remain comfortably deliverable in t of plan preparation. With a 10% erable throughout the plan period ite, should occur.

		Land East of Pencoed – This site is located to the north of Junction 35 of the M4. There are a number of concerns in bringing this site forward for residential development including the provision of pedestrian connectivity routes, flood risk and ecological constraints associated with the adjacent SSSI. Proposed Policy PLA4 notes that the presence of dormice and/or GCN is likely to affect the area available for development. Furthermore, a high-pressure gas main runs north to south across the site. Due to the high-pressure nature of the pipeline it is considered a hazard and there are also development exclusion zones associated with the pipeline. This is a constraint to development on a large part of the site as it limits the developable area. There are also land ownership issues associated with the 2.1ha 3G football pitch within the site which is identified on the proposed masterplan as a potential location for the required new primary school. Although within the extent of the site, this land falls outside of the ownership of the promoter. Its delivery is therefore uncertain although it is a key requirement of this strategic allocation These issues should be taken into account when assessing the viability and deliverability of the site. The Council estimate in the trajectory that residential completions will start coming forward on this site by 2023	Change to housing trajectory for Land East of Pencoed	As documented in the Candidate Site Assessment, the Land East of Pencoe demonstrated delivery in accordance with the requirements set out in the Developr plethora of evidence has been provided to the Council to support its delive investigations and appraisals, masterplans, a viability assessment, a tran consideration of s106 requirements, infrastructure and costs. This process ha confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary communities. All constraints highlighted by the representor have been duly consider and prior to Deposit Plan stage. The related housing trajectory was prepared initial the respective site-promoters, followed by effective collaboration and involvement at a Stakeholder Group Meeting. As such, the proposal to delay the site housing t
┝	1165	which is considered to be very optimistic. Re-consideration of the Land East of	Query on whether	As documented in the Candidate Site Assessment, the Land East of Pencoe
		Pencoed Allocation Pencoed Allocation Pencoed is identified as one of the sustainable growth areas, with the Land East of Pencoed [SP2 (4)] being the sole allocation of circa 770 dwellings being proposed. There is no objection per-say to the inclusion of just one strategic site in a growth area, the main objection stems again relating to the deliverability of the site in question. It is known and documented that this site has a series of significant constraints in the form of: a) High-pressure gas main (easement required) At this time, we query whether appropriate easements have been confirmed with appropriate parties, which	Land East of Pencoed is deliverable in whole or in part.	demonstrated delivery in accordance with the requirements set out in the Developr plethora of evidence has been provided to the Council to support its delive investigations and appraisals, masterplans, a viability assessment, a tran consideration of s106 requirements, infrastructure and costs. This process ha confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary communities. All constraints highlighted by the representor have been duly conside and prior to Deposit Plan stage. The related housing trajectory was prepared initial the respective site-promoters, followed by effective collaboration and involvement at a Stakeholder Group Meeting. As documented within the Housing Trajectory B no outstanding matters of disagreement on the completion figures or the timing an period (including those sites with planning permission and new housing allocation Stakeholder Group Meeting. As such, the concerns highlighted regarding Land Ea are both unsubstantiated and not supported.

oed site promoter has robustly opment Plans Manual. A detailed livery, including numerous site ansport assessment and due has provided a high degree of ora of associated development ary to deliver high-quality new high-quality

bed site promoter has robustly opment Plans Manual. A detailed ivery, including numerous site ansport assessment and due has provided a high degree of ora of associated development ry to deliver high-quality new sidered throughout this process tially through close dialogue with ent with a range of stakeholders and phasing of sites in the plan ions) following conclusion of the East of Pencoed's deliverability

don't fundamentally impact the delivery of key infrastructure to service the site, to yield the full quantum of 770 dwellings on this site. b) C2 flood risk (off-setting of development required) Noting the contents of Bridgend Strategic Flood Consequences Assessment and NRW DAM Maps, there are significant areas across the County, including Pencoed (and indeed the allocation in question at Land East of Pencoed) are highly constrained by flood plains. Given this, queries are raised as to whether appropriate off-setting of development and the net developable area is appropriate to accommodate the 770 dwellings, as well as confirming that SUDs and other drainage features of this site can capably be accommodated and also not fundamentally impact any other neighbouring residents in flood risk terms. Turning to net developable area, this allocation is 44.27ha overall, with 2.3ha dedicated to deliver a school, so overall 41.97ha in total for 'general development' comprising residential development, open space, general infrastructure etc. Queries are raised as to whether this, given the significant constraints identified, is sufficient land to provide the necessary requirements to form an appropriate development on this site. Further clarity is required. c) Ecological constraints (off-setting / buffers required to development) This is linked to the above point of net developable area and ensuring appropriate buffering is provided generally to this site. d) Multiple Landowners Queries are raised on the landowner's position and whether all parties are indeed in agreement with this proposal. This could scupper any proposal to bring forward 770 dwellings which would fundamentally go to the heart of the emerging Plan. As a result, a question is raised insofar as, are the Local Authority satisfied that all of the land will be sold / made available for development. Given the current use as an Agricultural College, gueries are raised to the landowner's commitment to the disposal of all or at least part of the site for development? Overall, queries are raised, and it is considered that significant levels of clarity are



required to ensure this site is deliverable in whole or in part.		
<b>Commentary upon SP2 (2) – Land South</b> <b>of Bridgend</b> The allocation of this site is not objected to; however, queries are again raised with the adequacy of mitigation measure put in place through the masterplan process to-date given the immediate planning policy and other designations around the site – queries are therefore asked as to whether the Local Authority and/or other statutory consultees are satisfied that there would be no material harm to the overall quantum promoted to- date. As per the proposed Deposit Plan extracts below, it is illustrated that this proposed allocation is immediately adjacent to a designated SINC along with an Historic Park and Garden, and Archaeologically sensitive designation. Therefore, considered to be extremely sensitive designations. Queries are therefore raised on the satisfactory mitigation allowed for in the master plan to-date, and if enough is not provided to-date in terms of Green Infrastructure, buffering to the historic park and garden, and SINC, queries are therefore raised as to whether the site can deliver in the fullest quantum proposed.		As documented in the Candidate Site Assessment, the Land South of Bridgend (Is robustly demonstrated delivery in accordance with the requirements set out in the A detailed plethora of evidence has been provided to the Council to support its del investigations and appraisals, masterplans, a viability assessment, a tran consideration of s106 requirements, infrastructure and costs. This process ha confidence that the site is realistically deliverable, considering the full plethora requirements, infrastructure provision and placemaking principles necessary communities. The related housing trajectory was prepared initially through close site-promoters, followed by effective collaboration and involvement with a range of Group Meeting. As documented within the Housing Trajectory Background Papi matters of disagreement on the completion figures or the timing and phasing of site those sites with planning permission and new housing allocations) following conclu Meeting. As such, the concerns highlighted regarding Land South of Bridgend (I both unsubstantiated and not supported.
Land at Penprysg Road, Pencoed As you will recall, our client has submitted representations for a Candidate site already - Land of Penprysg Road, Pencoed (Candidate Site Ref. 87.C1). Following the submission of extensive information demonstrating that the site is viable and readily available for development, the receipt of market interest from local developers and the requirement for local authorities to allocate a 'range of sustainable and deliverable sites to allow all sectors and types of house-builder, including nationals, regionals, registered social landlords (RSLs), Small and Medium Enterprises (SMEs) and the custom and self-build sector the opportunity to contribute to delivering the proposed housing requirement', as outlined in Planning Policy Wales (PPW 11), the	Allocate Land at Penprysg Road, Pencoed (Candidate Site: 87.C1)	Informed by the Sustainability Appraisal Report, the Candidate Site Assessment Deposit Plan confirms and provides reasoned justification for the outcome of the si of each candidate site. In relation to Broadlands (Candidate Site Ref: 87.C1) speci "The candidate site is located on the periphery of Pencoed, which is identified as defined by SP1). There are highway issues associated with the site in addition to the area whereby a site of this size would further exacerbate without the ability sustainability and place making credentials of the site are acknowledged, there are have been carried forward as allocations in the Deposit Plan without the presence site will not be allocated in the Deposit Plan". Whilst the Council notes the representor's objection to this conclusion, the prop reasons outlined.

I (Island Farm) site promoter has the Development Plans Manual. delivery, including numerous site ansport assessment and due has provided a high degree of ora of associated development ary to deliver high-quality new ose dialogue with the respective of stakeholders at a Stakeholder aper, there were no outstanding sites in the plan period (including clusion of the Stakeholder Group d (Island Farm) deliverability are

ent published to accompany the site selection process in respect ecifically, the Assessment states,

as Sustainable Growth Area (as to education capacity issues in ity of resolving them. Whilst the are other more suitable sites that ce of such issues Therefore, this

roposal is not supported for the

clients wish to, once again, raise these development opportunities to the Local Authority's attention and seek it's allocation in the emerging plan.

Since the previous submissions, and to support these representations, Pobl have entered into an exclusivity agreement with the site promoter confirming Pobl's intent to assist with and commit to the delivery of the homes on this site

The suitability, viability and deliverability of the proposed sites

As outlined in the extensive submissions made by the site promoter during the Candidates Site Process (including Candidate Sites representations in 2018, representations to the Preferred Strategy in 2019, Stage 2 Candidate Sites Representations in 2020 and the comprehensive suite of additional information submitted and discussed at length with LDP Officers), the site promoted by the client is inherently suitable for residential development, with a partner backing the site should the site be allocated to deliver the scheme within a suitable timeframe (3-years is being proposed within the agreement) and a commitment to delivering a bespoke product that will achieve new energy standards in line with the Council's aspirations.

With regards to the candidate site submitted, it is evident that the site is in a highly suitable location for residential development, and for inclusion as such within the allocations outlined in Policy COM1 (Housing Allocations). As outlined throughout the extensive documentation submitted, the site is located immediately adjacent to the settlement boundary of Pencoed, is not in the defined 'moratorium of growth' owing to issues arising from the railway bridge in Pencoed and, its allocation would be accommodated as part of a rounding off of the settlement boundary of Pencoed. In addition to this, the site is located within close association and connection to Pencoed which provides a range of services and



facilities – in this way, the allocation of this site would facilitate the sustainable growth of the settlement as per the aspirations of BCBC.

The site promoter, Caradog Ltd, have provided extensive supporting information to categorically conclude the quantum of units promoted are inherently deliverable in line with Placemaking requirements, public open space provision, appropriate highway and access considerations and active travel linkages. Which fully comply with Welsh Assembly Government and Council aspirations of creating cohesive new neighbourhoods as defined in PPW11 and Future Wales Plan.

In addition to this, transport surveys have been undertaken by Corun Associated Ltd. These demonstrate that there is no existing highway safety pattern or problem with the vicinity of the sites which could be exacerbated by the proposals, that the site is highly accessible by sustainable modes of travel due to integration with the surrounding residential areas and that the appropriate access can be achieved.

Similarly, and crucially, viability work has been undertaken at both sites and submitted in support of their residential allocation. This demonstrates that when the key headline financial viability inputs are taken into account, the site remains viable and, in turn, deliverable in commercial terms. Additionally, the inherent deliverability of the sites is further confirmed by the ownership position of the sites. In fact, as outlined throughout the extensive representations submitted to BCBC, the sites are within the full ownership and control of the site promoters, by way of an option agreement being in place. As mentioned above, there is a separate agreement in place with a delivery partner to bring this site forward in a defined period of time should the site be allocated. As such, the sites are ready to come forward for development within the early stages of the plan. The inherent deliverability of the sites



has, as previously confirmed has developer backing to bring the site forward within 3 years of allocation.

# Further Options for Penprysg Road

In light of the above, and expected shortfall of housing delivery, and referring back to the candidate site submission associated with Penprysg Road – a number of alternative options were promoted which were a lesser quantum that the overall site.

On the basis of the above, a number of extracts are provided below on a 'per option' basis, which are very loose / fluid in design. The options are as follows:

## Option 1

This consists of:

- Circa 270 dwellings;
- Green and Blue Infrastructure routes;
- Landscape buffers; and
- Access via Penprysg Road.

## Option 2

This consists of:

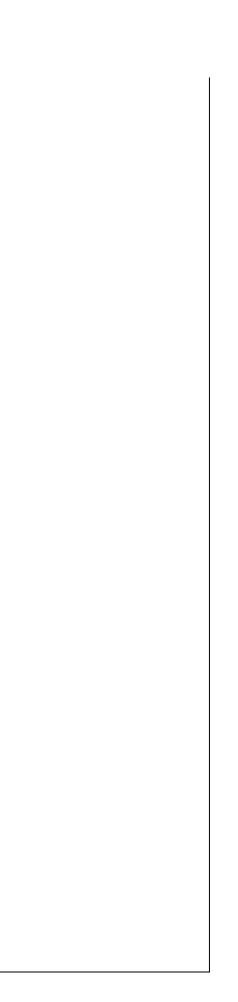
- Circa 150 170 dwellings;
- Green and Blue Infrastructure routes;
- Landscape buffers; and
- Access via Penprysg Road.

## Option 3

This consists of:

- Circa 100 dwellings;
- Green and Blue Infrastructure routes;
- Landscape buffers; and
- Access via Penprysg Road.

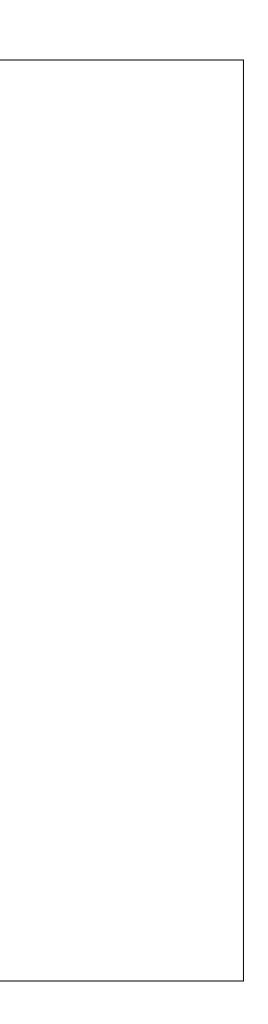
The site is therefore perfectly designed to be brought forward in a phased manner, and if Option 1 (the whole site) is not considered appropriate, then Option 2 and 3 are considered appropriate as they are smaller in quantum, and can assist in the short term to bridge a delivery gap. These options should be considered to be included as allocations given the general uncertainty of delivery of sites proposed so far (as mentioned above).



1221	As an established firm of Estate Agents and	Support the	Comments noted.
1221	5		
	Chartered Surveyors dating back to 1857	Deposit Plan,	All allocations have been proposed based on the suiteens of the Condidate Site A
	with offices based in Cowbridge, Bridgend	particularly the allocation of Land	All allocations have been proposed based on the outcome of the Candidate Site As
	and Penarth, Watts & Morgan LLP are clearly		with the National Sustainable Placemaking Outcomes, the Gateway Test applied
	interested in the Replacement Local	West of Bridgend.	and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis.
	Development Plan (RLDP) which is currently		are considered to demonstrate delivery in accordance with the requirements set o
	out for consultation. The plan discusses in		Manual. All strategic sites key to the delivery of the plan have been subject to great
	detail the visions and objectives of Bridgend		support their delivery, including schematic frameworks, phasing details, key trans
	County Borough Council, regarding areas		10 requirements, design parameters, s106 requirements, infrastructure and costs.
	such housing. In practice we support the		degree of confidence that the sites included within the Deposit Plan are realistically
	RLDP's preferred strategy for housing to the		full plethora of associated development requirements, infrastructure provision
	west of Bridgend and are in fact in full support		necessary to deliver high-quality new communities.
	of the proposals made by Llanmoor- Homes,		
	who are seriously looking at this site, as a		
	possible development site. As a firm of Estate		
	Agents and Chartered Surveyors Watts &		
	Morgan LLP fully appreciate and understand		
	the planning process and the need for		
	Bridgend County Borough Council to produce		
	a replacement or review of their current Local		
	Development Plan. This will clearly require		
	the identification of sites for various land		
	uses, including housing, employment,		
	infrastructure, community uses and retail		
	etc., in order that the future needs of		
	Bridgend and its surrounding inhabitants can		
	be met. As a practice we have looked at the		
	extensive background papers that support		
	the RLDP and are fully aware and appreciate		
	how much work and detailed assessment		
	goes into the selection of various Candidate Sites (such as the land west of Bridgend).		
	···· (··· ··· ··· ··· ··· ··· ··· ··· ·		
	which particularly look at placemaking and all		
	those associated technical issues which may		
	be related to a particular proposal, while		
	achieving the necessary economical and		
	spatial outcomes as proposed by Bridgend		
	County Borough Council. Watts & Morgan		
	understand that the submission of land to the		
	west of Bridgend as a Candidate Site would		
	have followed an appropriate assessment		
	process. All the necessary technical reports		
	would have accompanied the submission of		
	this Candidate Site through the RLDP review		
	process and accordingly would have been		
	deemed to comply with all the necessary		
	policy requirements which have been duly		
	included within the Deposit Consultation		
	Document, as an allocation for housing		
	together with the proposal of a primary		

Assessment, their compatibility ied to the site search sequence is. All new proposed allocations et out in the Development Plans reater evidence requirements to ansport corridors, critical access ts. This process provides a high cally deliverable, considering the on and placemaking principles

school, community hub and extensive areas of green infrastructure, as well as providing public access throughout the site which is currently privately owned to numerous areas of green space, parks and play areas. The site we understand will make provision for affordable housing of approximately 170 units. The proposed RLDP vision explains that the county borough is undergoing incremental, long term socio-economic renewal such that Bridgend's RLDP should support existing regeneration efforts and further growth without imposing fundamental change. Watts & Morgan LLP feel that the newly proposed RLDP vision sets out clearly and appropriately addresses the key spatial challenges and opportunities facing the county borough, including existing economic strengths in advanced manufacturing and the need for improved infrastructure, the need for new employment opportunities and the decarbonisation of key sectors, each of which will have spatial implications to deliver sustainable economic growth. The proposed RLDP vision therefore calls for Bridgend, Porthcawl, Maesteg and Llynfi Valley to accommodate the majority of growth, while having distinct roles within a coherent network of settlements. Watts & Morgan LLP fully support the proposals underlined in the new RLDP which is currently at consultation as we feel that there is a need to support economic growth while recognising that the proposed approach will maximise positive wellbeing outcomes and help to protect environmentally sensitive areas. Watts & Morgan are aware of the detailed analysis that has gone into the Llanmoor solution, and fully endorses their proposals. As a high-level focused around statement using placemaking to achieve regeneration and economic growth Watts & Morgan LLP feel that the RLDP's vision is likely to support a greater emphasis on the delivery of a refreshed spatial strategy and place-based policies within the emerging RLDP rather than the existing adopted LDP, which would enhance local distinctiveness and the ability to meet the differential needs of communities such as Bridgend. Watts & Morgan LLP



	therefore feel that the proposed RLDP vision is both appropriate and compatible with achieving sustainable development especially in relation to its housing proposals for land west of Bridgend. Watts & Morgan LLP feel that the proposed area west of Bridgend is an extremely good site for redevelopment which if delivered, all of the requisite environmental and sustainable targets that have been outlined and stated by Bridgend County Borough Council would be met. Watts & Morgan LLP note the need for new housing in the area of Bridgend and especially in relation to the ever-growing young population in the Vale of Glamorgan. In conclusion Watts & Morgan LLP feel that the RLDP provides a sufficient quantum and range of good quality and affordable housing and sustainable locations such as that proposed for the land west of Bridgend and that if allowed to take place will meet and satisfy a larger number of local and regional needs. Watts & Morgan LLP has always finally identified itself with the visionary needs and socio-economic, environmental, cultural and infrastructure changes that are required to take place from time to time in specific places within the Bridgend County Borough area as determined by the needs of an ever- growing population. If we can be of any further assistance, then please do not hesitate to contact us.		
221	Land at Broadlands (221.C1)		
	This letter relates specifically to the Land at Broadlands site (candidate site ref: 221.C1) and the sustained position of Persimmon Homes West Wales that that the candidate site should be allocated for housing (providing up to 173 homes) within the Deposit Plan. As such, Persimmon Homes West Wales object to the Deposit Plan on the basis that the sites' exclusion from Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1 renders the plan 'unsound'.	Broadlands (Candidate Site ref: 221.C1)	The Preferred Strategy identified a range of potential types of sites that could Strategy. These included Regeneration Sites, Sustainable Urban Extensions, Local Settlement Sites. The Council has taken into account the full SA site a Appendix G of the Sustainability Appraisal, to select an appropriate suite of infrastructure proposals to meet identified needs. Informed by this SA Report, t Report confirms and provides reasoned justification for the outcome of the site each candidate site. In relation to Land at Broadlands, the Candidate Site Assessment states, "The candidate site is located on the periphery of Bridgend which is identified as defined by SP1). There are education capacity issues in the area whereby a exacerbate without the ability of resolving them. Whilst the sustainability and place are acknowledged, there are other more suitable sites that have been carried Deposit Plan without the presence of such issues".

uld deliver the Growth and Spatial ns, Edge of Settlement Sites and e assessment findings detailed in of proposed site allocations and rt, the Candidate Site Assessment site selection process in respect of

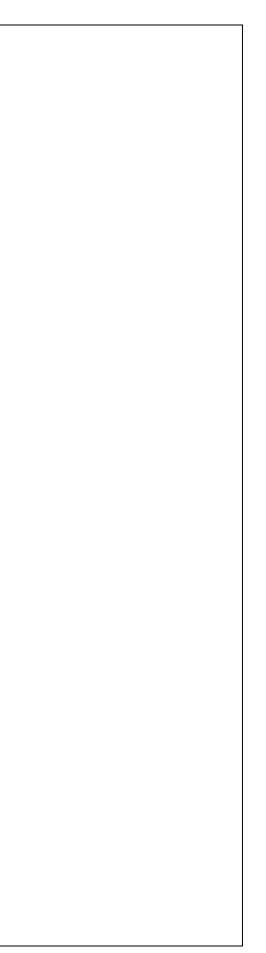
as a Sustainable Growth Area (as a site of this size would further lace making credentials of the site ried forward as allocations in the As part of the preceding Preferred Strategy and Candidate Sites Assessment process, a comprehensive suite of background information has been submitted to the Council in support of the proposed allocation of land at Broadlands, Bridgend (ref: 221.C1). evidence presented The clearly demonstrates that the candidate site is free from planning, physical and ownership constraints and is evidenced as being economically viable, as required by PPW 11. The residential allocation of the site would undoubtedly 'round off' the western extent of the Bridgend settlement, maximise the sustainable location and would play a significant role in the delivery of the growth strategy for the County Borough in the short term.

Land at Broadlands is being actively promoted by Persimmon Homes West Wales (as the future developer) and is part owned. In view of this, the deliverability complexities relating to land transfers / assembly and delays connected to house-builder involvement in the formulation of concept masterplans etc associated with landowner / Council promoted sites do not apply to this candidate site, as the ultimate developer has had involvement in the site promotion from the outset. The site is deliverable within the early stages of the Plan Period, and could promptly supply a mix of market and affordable homes, given that much of the due diligence requirements relating to housing delivery has already been completed. Persimmon Homes West Wales express considerable disappointment and frustration that the Council have proceeded not to allocate the land at Broadlands site for residential development within the Deposit Plan, notwithstanding the robust and comprehensive candidate site submission justifying the inclusion of the site. Equally, by virtue of proceeding to allocate the proposed West Bridgend (PLA3) strategic allocation immediately to the north of the A473 only and not including the Broadlands candidate site to the south of the A473, has resulted in an illogical and unjustified exclusion of the site

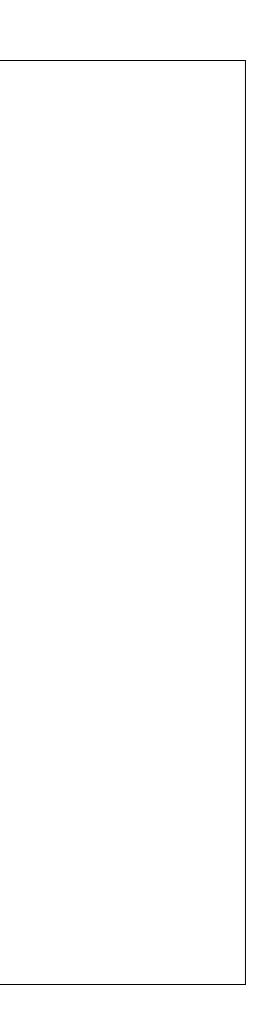
Whilst the representor's comments are noted, it is not considered necessary to allocate this site in order to deliver the Replacement LDP's housing requirement. As illustrated within the housing trajectory, the other proposed sites collectively demonstrate that the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period without Land at Broadlands being allocated.

For purposes of clarity, while the representor states Parc Afon Ewenni COM1(1) is not "required to provide onsite education provision as part of the proposed allocation in the Plan", the Council has now removed the site from the housing trajectory due to flood risk and subsequent uncertainty relating to delivery timescales. The Candidate Site Assessment (2022) report has been updated to reflect this constraint, of which states that 'the site is located within the settlement boundary of Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The site represents a 'Rollover' allocation from the existing LDP (REG1(6)) and is proposed to be developed for commercial and residential uses. However, the Council's Strategic Flood Consequences Assessment identifies that the site is significantly vulnerable to flood risk. As such, the site will not therefore be allocated for development in the Replacement LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewenni due to the uncertainty over delivery timescales as a result of flood risk. Nevertheless, the Infrastructure and Delivery Appendix (Appendix 5) to the Deposit Plan currently sets out key site-specific information for the Strategic Sites only. More detailed information will be included on all remaining housing allocations listed in Policy COM1 and employment sites to improve clarity in this respect. This will set out what is expected from each allocated development and the costs in bringing each site forward.

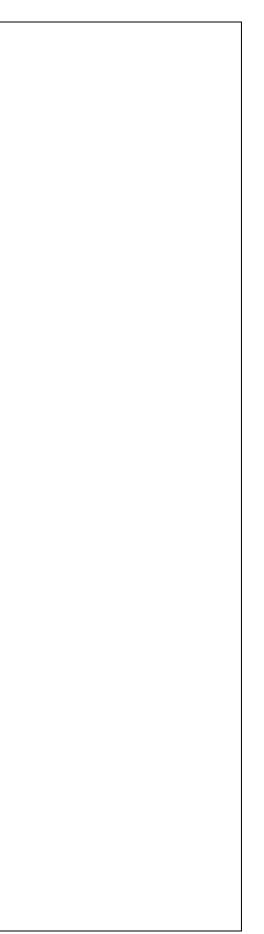
from western edge to the settlement of Bridgend (see Figure 1 - Deposit Proposals Map extract). The logic behind not identifying the future settlement boundary extent around the West Bridgend allocation is likewise questioned. The rationale for not including the sile within the wider growth stateay for West Bridgend and the wider Bridgend Sustanable Growth Area (and settlement boundary) within Deposit Prolices COMI, SP2 and SP6 is similarly fundamentally questioned, with the provided being the lack of provision of an on-the provided being the lack of the capacity issues surrounding deutation for primary and secondary age within west Bridgend (discussed in the following section). In view of the above, we encourage the County Borough to revisit their overarching housing strategy for West Bridgend and allocate the Broadlands candidate Site Is consuce that in accordance with the tests of soundness, the Plan can demonstrate a logical and reasonable approach has been taken (Tests 2 and 3). Candidate Site Assessment Report (2021) sets out the Council's rationale behind not allocating the is located on the perphery of Bridgend which is identified as a Stratamable Growth Area (as defined by Stratamable Growth Ar			
<ul> <li>the wider growth strategy for West Bridgend and the wider Bridgend Sustainable Growth Area (and settlement boundary) within Deposit Polices COMI, SP2 and SP6 is similarly fundamentally questioned, with the exception of the only reason having been provided being the lack of provision of on-site primary education facilities and the capacity issues surrounding education for primary and secondary age within west Bridgend (discussed in the following section). In view of the above, we encourage the County Borough to revisit their overarching housing strategy for West Bridgend and allocate the Broadlands candidate site, to ensure that in accordance with the tests of soundness, the Plan can demonstrate a logical and reasonable approach has been taken (Tests 2 and 3).</li> <li>Candidate Site Assessment</li> <li>The Bridgend Candidate Sites Assessment Report (2221) sets out the Council's rationale behind not allocatin capacity issues in the begins endinated as a didate site is located on the periphery of Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). There are education capacity issues in the area whereby a site of this size would further exacechate without the ability of resolution galaxy issues in the area whereby a site of the site are area accordance as the this state and place making credentials of the site are acching thousing the site is provided below.</li> </ul>	Bridgend (see Figure 1 – Deposit Proposals Map extract). The logic behind not identifying the future settlement boundary extent around the West Bridgend allocation is likewise		
The Bridgend Candidate Sites Assessment Report (2021) sets out the Council's rationale behind not allocating the site for residential development within the Deposit Plan. It states: "The candidate site is located on the periphery of Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). There are education capacity issues in the area whereby a site of this size would further exacerbate without the ability of resolving them. Whilst the sustainability and place making credentials of the site are acknowledged, there are other more suitable sites that have been carried forward as allocations in the Deposit Plan without the presence of such issues". In this regard, the matter of education as the only given reason for dismissing the site is provided below.	the wider growth strategy for West Bridgend and the wider Bridgend Sustainable Growth Area (and settlement boundary) within Deposit Polices COM1, SP2 and SP6 is similarly fundamentally questioned, with the exception of the only reason having been provided being the lack of provision of on-site primary education facilities and the capacity issues surrounding education for primary and secondary age within west Bridgend (discussed in the following section). In view of the above, we encourage the County Borough to revisit their overarching housing strategy for West Bridgend and allocate the Broadlands candidate site, to ensure that in accordance with the tests of soundness, the Plan can demonstrate a logical and reasonable approach has been taken (Tests		
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	Report (2021) sets out the Council's rationale behind not allocating the site for residential development within the Deposit Plan. It states: "The candidate site is located on the periphery of Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). There are education capacity issues in the area whereby a site of this size would further exacerbate without the ability of resolving them. Whilst the sustainability and place making credentials of the site are acknowledged, there are other more suitable sites that have been carried forward as allocations in the Deposit Plan without the presence of such issues". In this regard, the matter of education as the only given reason for dismissing the site is provided below.		
	Education		



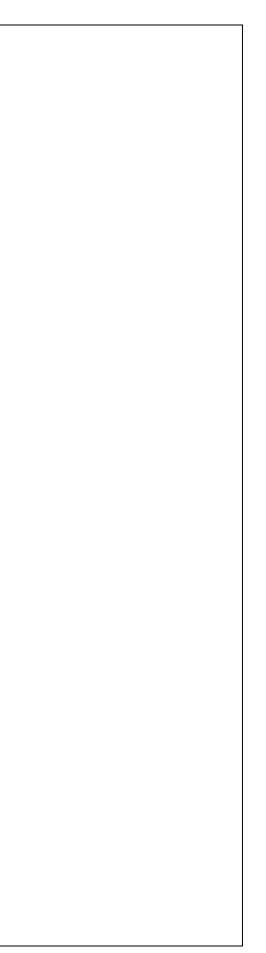
It is acknowledged that the County Borough's housing strategy in terms of the Deposit Plan is to allocate more strategic sites which can provide on-site infrastructure, in particular education provision. The shortcomings of the existing adopted Bridgend Local Development Plan (2006 to 2021) regarding the lack of on-site infrastructure provision due to the number of smaller / medium scale allocations and the associated effects on capacity education current are acknowledged. It is however deemed to be unreasonable to assume that this therefore means that notwithstanding all other Sustainability Appraisal criteria considerations (as discussed in the following section), any site located within an area experiencing education capacity issues would need to provide on-site facilities to justify allocation, or otherwise should be excluded from the Plan. As the Council will be aware, none of the following large scale residential allocations proposed likewise within Bridgend in the Deposit Plan COM1 (Housing Allocations) are required to provide on-site education provision as part of the proposed allocation in the Plan. This is notwithstanding that there are likewise existing primary school capacity issues within catchment of the following proposed allocations within Bridgend: • Parc Afon Ewenni, Bridgend (675 homes) estimated / approximate school place requirements based on the Educational facilities and Residential Development SPG2 34 nursery and 223 primary; and • Craig y Parcau, Bridgend (110 homes) necessitating 6 nursery and 36 primary places. All sites will be expected to address the existing capacity issues via contributions necessitated by the Education Facilities and Residential Development SPG. In view of the above, it seems entirely unreasonable to discount the Broadlands candidate site purely on the basis of educational capacity.



 when other sites lying within areas also	
experiencing school capacity issues have	
been allocated and an acceptable	
educational strategy discussed. PPW 11	
Paragraph 4.2.16 states that: "Planning	
0 1 0	
authorities, land owners and house builders	
must work together constructively to identify	
deliverable housing land in sustainable	
locations for development". A proactive and	
collaborative approach to resolving this	
matter should be taken by the County	
Borough. It is deemed that with a fairly limited	
amount of dialogue between education and	
planning policy officers, a strategy can be	
devised which would ensure an appropriate	
education provision with regard to the Land	
at Broadlands (ref: 221.C1) residential	
development to assist to deliver education	
capacity, either by:	
<ul> <li>Provision financial contributions for an</li> </ul>	
upgrade to the school provision planned	
within the wider West Bridgend (SP2(3) /	
• • • • • • • • • • • • • • • • • • • •	
PLA3) allocation; or	
• Financial contributions to the upgrade of the	
existing primary schools at Trelas Primary	
School in Laleston (in-catchment) and / or	
Bryntirion Infant School (adjacent catchment)	
The following extract from Infrastructure	
Delivery Plan (2021) identifies the following	
requirements for education provision relating	
to the PLA3 Land West of Bridgend strategic	
allocation, which are deemed 'critical to the	
delivery of the LDP':	
-	
By virtue of the Deposit Plan allocation	
(SP2(3) / PLA3), the development of the	
West Bridgend site is to provide:	
• 1.3 ha of land to accommodate two form	
entry primary school with co-located nursery	
facilities plus 0.5 ha for any future expansion;	
• 4 ha of land to facilitate the relocation of	
Heronsbridge Special Needs School;	
• Financial contributions for nursery, primary,	
secondary and post-16 education provision,	
secured through Section 106 in accordance	
with the Education Facilities and Residential	
Development SPG.	



Persimmon Homes West Wales confirm that	
financial contributions towards the	
overarching strategy for West Bridgend or an	
alternative strategy in the shorter term	
relating to the existing schools could be	
provided prior to the commencement of	
residential development of the Broadlands	
site, to provide readily available finance the	
educational strategy in the short term.	
Although the physical capacity issues at the	
existing nearby primary schools are	
acknowledged, with a joined-up approach	
with education officers and/or the promoters	
of the wider West Bridgend allocation, it is	
deemed this matter can be easily resolved to	
the benefit of the Well-being of Future	
Generations and provision of sustainable	
homes in West Bridgend.	
nomes in west bhagena.	
Alternative Site Allocations / Sustainability	
Appraisals Tetra Tech Planning have	
likewise undertaken a review of the final	
Sustainability Appraisal (SA) of the candidate	
site, after applying policy level mitigation.	
Attachment A to this letter sets out extracts	
from the SA for the sites allocated in the	
Deposit Plan (strategic and non-strategic)	
and also relating to the Land at Broadlands	
(221.C1) (up to 173 homes) 'reasonable	
alternative'. These summary tables set out	
mitigation already incorporated within the	
Deposit Plan and identify the residual likely	
significant effects of the proposed site	
allocations and reasonable alternatives when	
assessed against the full SA site assessment	
criteria.	
The schedule identifies that the only likely	
significant adverse effect after policy level	
mitigation attributed to both the Broadlands	
sites is: "SA3e (Employment & Skills) –	
Evidence from site promoter that site is	
accessible to secondary education	
infrastructure and of how secondary	
education needs can be met?". In terms of	
secondary education, Bryntirion	
Comprehensive School lies within catchment	
of the site 1.8 km north east and there is	
understood to be insufficient capacity for the	
school to accommodate new students, at	
school to accommodate new students, at	

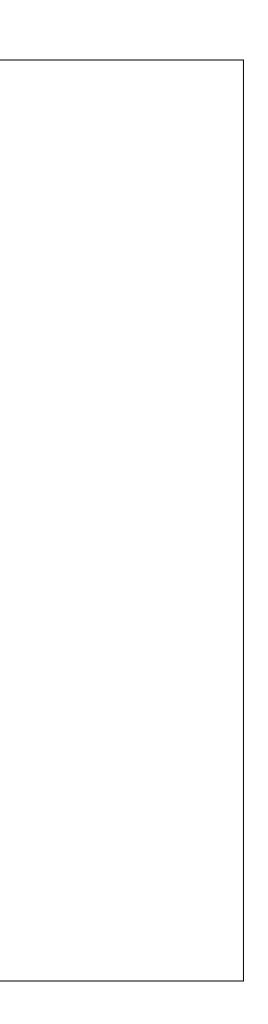


present. With regard to secondary and post-16 education, it is understood the Council's education officers are presently consulting on strategies regarding potential school mergers as part of the 21st Century Schools / School Modernisation Programme and financial contributions in support of this can be secured through Section 106 in accordance with the Education Facilities and Residential Development SPG (in the same way deemed acceptable with regard to West Bridgend (PLA3)). Persimmon Homes West Wales welcome dialogue with the Council's education officers on how the Broadlands site can assist with the 21st Century Schools / School Modernisation Programme, given the opportunity to engage in such discussions has not arisen to date. Given the decision by the Council to allocate land immediately to the north of the A473, it would be illogical for the Council to suggest that there are any insurmountable issues with the allocation of the land south of the A473 resulting from the SA process that cannot be address via policy level mitigation (for example; completion of existing active travel routes, access to facilities etc). As such, the only identified residual 'significant adverse effect' identified by the SA process (being secondary education) is felt can be resolved.

### Summary

In summary, the rationale provided for discounting the site from the Candidate Sites Assessment and Sustainability Appraisal process is not based on robust and credible justification, nor gives due consideration to strategies available to apply design or policy mitigation (for example: education and active travel, like have been applied to the strategic sites). In view of the above, the Deposit Plan is therefore not considered to meet with the tests of soundness, clearly applies a bias towards strategic sites and is therefore deemed to be 'unsound' on this basis

As set out in the overarching representations submitted on behalf of Persimmon Homes West Wales, concerns have been raised regarding the robustness of the phasing /



	trajectory of the housing numbers put forward in the Deposit Plan and therefore ability to meet housing requirements over the Plan Period. The Deposit Plan indicates; "A combination of different site typologies is necessary to deliver the growth requirements of the LDP. These include a limited number of Sustainable Urban Extensions, supported by Edge of Settlement Allocations and Local Settlement sites" (paragraph 4.3.53). It is evident that to achieve this, the Council need to allocate more realistically deliverable additional edge of settlement sites, in addition to those currently proposed within the Deposit Plan. Persimmon Homes West Wales therefore object to the exclusion of the Broadlands site within the Deposit Plan and encourage further dialogue from the Council regarding the allocation as a deliverable additional option for up to 173 homes within Deposit Plan Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1		
221	Land south of Coychurch (221.C3) This letter relates specifically to the Land south of Coychurch site (candidate site ref: 221.C3) and the sustained position of Persimmon Homes West Wales that the site should be allocated for the provision of up to 512 homes within the Deposit Plan. As such, Persimmon Homes West Wales object to the Deposit Plan on the basis that the sites' exclusion from Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1 renders the plan 'unsound'. As part of the preceding Preferred Strategy and Candidate Sites Assessment process, a comprehensive suite of background information has been submitted to the Council in support of the proposed residential allocation of Land south of Coychurch (ref: 221.C3). The evidence submitted clearly demonstrates that the candidate site is free	Allocate Land South of Coychurch (Candidate Site ref: 221.C3)	The Preferred Strategy identified a range of potential types of sites that could of Strategy. These included Regeneration Sites, Sustainable Urban Extensions, Local Settlement Sites. The Council has taken into account the full SA site as Appendix G of the Sustainability Appraisal, to select an appropriate suite of infrastructure proposals to meet identified needs. Informed by this SA Report, th Report confirms and provides reasoned justification for the outcome of the site se each candidate site. In relation to Land South of Coychurch, the Candidate Site Assessment states, "The candidate site is located on the periphery of Bridgend which is identified as a defined by SP1). The proposed development would look to provide 500 homes of impact on local education provision without providing a new education facili compared to the other sites in Bridgend that are carried forward as allocation sustainable in that it is located further from the town centre with poor pedestriar this site would result in an increase in the dependency on the private car and the shift to more sustainable forms of active travel. The development would also re agricultural land. Therefore this site is not specifically allocated in the Deposit Pla Whilst the representor's comments are noted, it is not considered necessary to allo the Replacement LDP's housing requirement. As illustrated within the housing sites collectively demonstrate that the Anticipated Annual Build Rate (AABR) will the plan period without Land South of Coychurch being allocated.

Id deliver the Growth and Spatial s, Edge of Settlement Sites and e assessment findings detailed in of proposed site allocations and c, the Candidate Site Assessment te selection process in respect of

as a Sustainable Growth Area (as es which would have a significant icility on site. Additionally, when tions in the Plan, the site is less rian connectivity. Development of therefore not encourage a modal result in the loss of good quality Plan".

allocate this site in order to deliver ng trajectory, the other proposed will remain deliverable throughout

from planning, physical and ownership constraints and is evidenced as being economically viable, as required by PPW 11. This candidate site being actively promoted by Persimmon Homes West Wales (as the future site developer) and is subject to advanced discussions with all three landowners regarding an option agreement/s on the site. In view of this, the deliverability complexities relating to land transfers / assembly and delays connected to housebuilder involvement in the formulation of concept masterplans etc associated with landowner / Council promoted sites largely do not apply to this candidate site, as the ultimate developer has had involvement in the site promotion from the outset. The site is confirmed to be deliverable within the early stages of the Plan Period, and could promptly deliver a mix of market and affordable homes, as much of the due diligence regarding the delivery of housing on the site has already been completed. The proposed residential allocation of the Land south of Coychurch candidate site represents a logical extension of the existing eastern edge of Bridgend / south of Coychurch. The allocation would 'round off' the settlement in line with the green wedge boundary (as it currently stands) north of the A473, whilst at the same time avoiding coalescence with Pencoed. The candidate site would play a significant role in the delivery of the growth strategy relating to the provision of new homes in the County Borough.

### Candidate Site Assessment

The Bridgend Candidate Sites Assessment Report (2021) sets out the Council's rationale behind the non-allocation of the candidate site within the Deposit Plan, which is: "The proposed development would look to provide 500 homes which would have a significant impact on local education provision without providing a new education facility on site. Additionally, when compared to the other sites in Bridgend that are carried forward as allocations in the Plan, the site is less sustainable in that it is located further from the town centre with poor pedestrian



T	connectivity. Development of this site would		
	result in an increase in the dependency on the private car and therefore not encourage a modal shift to more sustainable forms of		
	active travel. The development would also result in the loss of good quality agricultural land. Therefore this site is not specifically		
	allocated in the Deposit Plan". In this regard, each matter for dismissing the site from allocation in the Deposit Plan being;		
	education, sustainability / active travel, comparison with other sites carried forward for allocation and loss of agricultural land are		
	considered in turn below.		
	Education PPW 11 Paragraph 4.2.16 states that: "Planning authorities, land owners and house builders must work together constructively to identify deliverable housing land in sustainable locations for development". In light of on-going discussions with the Council, Persimmon Homes West Wales have willingly reconsidered the feasibility of the potential provision of land for a single form entry primary school on the site, to directly address concerns regarding the capacity of Coychuch Llangrallo Primary School and the associated constraints in terms of the physical expansion of the school. Whilst the previous comments regarding the positive social integration benefits of expanding the existing primary school to draw in the new community are maintained, it is acknowledged that the on-site school provision would offer potential to ease the oversubscription of Coychuch Llangrallo Primary School and potentially allow for in- migration of pupils from elsewhere. The upgrade to the A473 / Main Road junction and improvement to the active travel route would allow for the safe movement of pupils from Coychurch and potentially the southern extent of Pencoed to the new primary school. It is considered that the proposals would constructively feed into the County Borough's	Allocate Land South of Coychurch (Candidate Site ref: 221.C3) as financial contributions for nursery, primary, secondary and post-16 education provision (where necessary), can be secured through Section 106	The Candidate Site Assessment references the fact that the proposed develop impact on local education provision without providing a new education facilit representor has stated "Persimmon Homes West Wales have willingly reconsider provision of land for a single form entry primary school on the site" since pu However, it is unlikely that the quantum of development proposed would give rise and, therefore, whether the development would be sufficient in critical mass to fu The representor's accompanying Independent Financial Viability Appraisal state IFVA for each site's financial contribution to educational facilities are based on di capacity of existing schools and colleges in the vicinity of each site; as well as the pupil place) that would be necessary to expand existing (or create new) pro calculation of financial contributions has been based on the updated SPG 16, v BCBC in March 2021". However, the accompanying proposed masterplan has r newly proposed one form entry school, and, moreover, it remains unclear whet school would be viable and deliverable on the site. In addition, siting a new school on the periphery of Bridgend, and one that woul pupils generated from Land South of Coychurch, could promote unsustainat travelling from other parts of the County Borough. For the reasons mentioned above, this proposal is not supported.

opment would have a significant lity on site. It is noted that the ered the feasibility of the potential publication of the Deposit Plan. se to a new primary school alone, fund a new primary school.

ttes, "The sums allowed in each discussions with BCBC about the the level of contribution (in £ per rovision, where necessary. The which was formally adopted by not been revised to include this ether provision of a new primary

uld not solely cater for additional able travel patterns from pupils

Modernisation Programme and has the potential to mitigate concerns regarding future primary school (including nursery) capacity in east Bridgend. In terms of secondary education and post-16 education, the recent discussions regarding the prospect of a sixth form centre of excellence at Pencoed Campus of Bridgend College, in partnership with Pencoed Comprehensive are noted. The residential allocation of the candidate site would clearly allow for future pupils to commute to Pencoed Comprehensive by bus (12-minute journey no 64-bus service) and to Bridgend College Pencoed Campus (18-minute journey - no. 64 bus service). There are no known future capacity issues at Pencoed Comprehensive nor at Bridgend College Pencoed Campus and therefore locating new residential development in this area is considered to be an entirely logical approach and financial contributions for nursery, primary, secondary and post-16 education provision (where necessary), can be secured through Section 106 in accordance with the Education Facilities and Residential Development SPG.

## <u>Alternative Site Allocations / Sustainability</u> <u>Appraisals</u>

Tetra Tech Planning have likewise undertaken a review of the final Sustainability Appraisal (SA) of the candidate site, after applying policy level mitigation. Attachment A sets out extracts from the SA for the sites allocated in the Deposit (strategic and nonstrategic) and the land south of Covchurch (221.C3) (up to 512 homes) 'reasonable alternative'. These summary tables take account of mitigation already incorporated within the Deposit Plan and identify the residual likely significant effects of the proposed site allocations and reasonable alternatives when assessed against the full SA site assessment criteria. The schedule identifies that the only likely significant adverse effect after policy level mitigation attributed to both the Coychurch site is: "SA3e (Employment & Skills) – Evidence from site promoter that site is accessible to

Allocate Land South of Coychurch (Candidate Site ref: 221.C3) as it is a 'reasonable alternative' within the SA and Financial contributions for secondary and post-16 education provision can be secured through Section 106 Proposal not supported. As detailed in the Sustainability Appraisal, "For the avoidance of doubt, the identification of a candidate site as constituting a reasonable alternative option does not imply BCBC either should or need to allocate the individual site, rather only that the site does not have 'showstopper' constraints and is therefore 'available' for consideration by BCBC as a potential site allocation. Full SA site assessment findings detailed in Appendix G, including all identified likely significant effects (beneficial or adverse) and proposed mitigation, have been taken account of by BCBC in selecting an appropriate suite of proposed site allocations and infrastructure proposals to meet identified needs. Informed by this SA Report, the Candidate Site Assessment published by BCBC to accompany the Deposit Plan confirms and provides reasoned justification for the outcome of the site selection process in respect of each candidate site" para 5.3.10.

secondary education infrastructure and of how secondary education needs can be met?". As previously set out within this letter, the site lies within easy school commuting distance on foot, cycle or public transport of Pencoed Comprehensive and the Pencoed Campus of Bridgend College. Financial contributions for secondary and post-16 education provision can be secured through Section 106 in accordance with the Education Facilities and Residential Development SPG to improve the existing provision by way of the wider 21st Century Schools / School Modernisation Programme. Persimmon Homes West Wales welcome continued dialogue with education and planning policy officers regarding any residual concerns regarding secondary and/or post-16 education, however it remains the case that the site is well-located with regard to secondary and post-16 educational facilities. In conclusion, the only identified 'significant adverse effect' can be easily addressed and therefore should be allocated for residential development as an additional site which can be clearly demonstrated to respond more positively in terms of the Sustainability Appraisal criteria, than other sites currently proposed to be allocated in the Deposit Plan. Sustainability / Active Travel As set out above, a key reason for not proceeding to allocate the site for residential

proceeding to allocate the site for residential allocation within the Deposit Plan is due to the perception that there are more sustainably located sites, due to the edge of settlement location away from the town centre and the Council's observation that the proposals will increase in the dependency on the private car / not encourage a modal shift to more sustainable forms of active travel. These comments are addressed in turn below:

Proximity to the town centre

Whilst it is acknowledged that the candidate site lies 3.9 km away from Bridgend town

Allocate Land South of Coychurch (Candidate Site ref: 221.C3) due to existing and potential active travel connectivity Whilst the representor has drawn attention to shops and services within the more immediate vicinity of the site, the presence of bus routes and the potential to upgrade active travel connections, the fact remains that the site is 3.9km away from Bridgend Town Centre. Allocation of this site over other sites that are closer to the town centre would be less conducive to sustainable, transit-orientated development in a manner that maximises potential for active travel. This could also be of detriment to the 'Town Centre First' principle outlined within national policy. As documented in the Candidate Site Assessment, this proposal is therefore not supported.

centre, notwithstanding this, various shops and services fall a short walk from the candidate site (c. 300 m) within the settlement of Coychurch including a convenience store and garage, hairdresser, pubs, and a community centre. Equally at the Kingsway, c. 600m west of the candidate site beyond the Coychurch roundabout are number of shops and community facilities including two banks, ATM, betting shop, dentist, chiropractor, laundry, hot-food takeaway and gastro-pub. Waterton Retail Park also lies c. 450 m west and comprises a range of national multiple retailers including Starbucks, B&Q, the Range, Sports Direct etc. The settlement of Pencoed (c. 2km north east) likewise offers a variety of shops, services and community facilities. In addition to the above, as set out in the supporting Transport Assessment (Vectos, October 2020), the residential allocation would provide an on-site community hub, as a central location for people to socialise, work and play. The community hub could provide a range of small-scale units suitable for retail, leisure and community uses. A key objective would be that the community hub would form the location for bicycle sharing schemes. With the introduction of new active travel routes (discussed below) and the utilisation of the existing BCBC interactive travel routes, there isn't deemed to be any substantiated issues with access to local shops, services and facilities, and it is argued that there are less well connected sites by foot / cycle located closer to the town centre that are proposed to be allocated in the Deposit Plan.

### Private Car Dependency / Modal Shift

In terms of car usage and modal shift, Persimmon Homes West Wales fundamentally dispute the suggestion that the residential development of the site would inevitably lead to private car dependency for travel purely due to the physical position south of the A473, and that the development would not lead to a modal shift towards active travel / use of public transport. This suggestion fails to acknowledge and reflect

on the considerable extent of supportive information provided to demonstrate how the proposals seek to address such matters, as part of the future development. A brief summary is provided below, however greater detail is provided within the documents listed at the end of this section: • Public Transport - Various bus stops lie within c. 320 m to the north on Main Road in Covchurch and provide regular existing services to Bridgend and the surrounding areas (services 404, 62, 64, 65 and 66). Crucially, there are existing regular bus service linkages to key as Pencoed destinations such Comprehensive, Bridgend College (Pencoed Campus) and the town centre. The potential exists to provide additional bus stops closer to the site, further reducing the time to commute to key destinations via public transport. In addition, Pencoed train station and Bridgend train station both lie within cycle distance of the candidate site (3 km north east and 4.2 km north west respectively), both providing regular services to both local and regional designations such as Cardiff and Swansea. It is therefore not accepted that the site location would result in private car dependency and not encourage a modal shirt towards use of public transport;

• Active Travel Connectivity – The candidate site offers various existing and future options in terms of active travel connectivity to the surrounds. With regard to existing active travel connections, a BCBC integrated network shared use foot / cycle path leads to Pencoed from the A473 / Main Road confluent and an existing BCBC integrated network on-road cycle route leading into Coychurch along Main Road (see extract below). In terms of future active travel infrastructure enabled by the development, two options for the scheme to provide new active travel routes along the A473 have been presented. This new route, coupled with the introduction of a new junction and crossing point at the confluent of the A473 and Main Road (Coychurch) which could significantly alter the use of the A473 and improve the ability to cross safely, likewise

reducing traffic speeds along this stretch and the current dominance of the dual carriageway, therefore resulting in a number of overarching Placemaking benefits. It is therefore not accepted that the site location would result in private car dependency and not encourage a modal shirt towards active travel;

• Active Travel Initiatives – The Coychurch site similarly offers a number of potential opportunities in terms of active travel initiatives, given the entire settlement of Bridgend is physically accessible to the site either on foot and cycle. As confirmed in the Transport Assessment (Vectos, October 2020), vouchers could be provided to each household to contribute to the purchase of a bicycle / E-bike as part of Travel Plan initiatives. The abovementioned community hub would likewise contribute to active travel initiatives, creation of school walking groups and promotion of the creation of various walking routes including the Bridgend Circular Route. It is therefore not accepted that the site location would result in private car dependency and not encourage a modal shirt towards both community and leisure active travel journeys.

Further information regarding the existing and potential connectivity benefits of the Coychurch site are set out in the following documents:

• Land south of Coychurch, Additional Candidate Sites Submission (WYG, July 2020);

• Transport Assessment (Vectos, October 2020);

• Interim Residential Travel Plan (Vectos, October 2020);

• Active Travel Connection – 04 (A115515 CMP-04); and

• Sustainability & Connectivity Note (WYG, July 2020).

The Council is encouraged to revisit this information and Persimmon Homes West Wales would welcome further discussion regarding the concerns raised. In summary, it

is not accepted that the proposals would result in private car dependency and encourage a modal shift towards the use of public transport and active travel, purely due to the location of the site south of the A473. <u>Comparison with 'Other Sites' (Parc Afon Ewenni)</u> The Candidate Sites Assessment Report (2021) compares the sustainability of Coychurch candidate site with "other sites carried forward as allocations", which is understood to mean the Parc Afon Ewenni mixed use located 1.5 km to the west of the Coychurch site. The Parc Afon Ewenni allocation includes for 675 homes (COM 1 (1)), which has been 'rolled-over' from the existing adopted LDP. The site lies between employment allocations within Bridgend Industrial Estate to the north of A473 and Waterton Industrial Estate to the south. Whilst it is accepted that there are a limited number of homes located adjacent to the site at Waterton Close and Waterton Lane, it is not considered that the Parc Afon Ewenni site is in any way is preferable over Coychurch in terms of connectivity of public transport / active travel, due to the significant constraints of the surrounding highway network and lack of any existing public transport stops connecting the site. It is not accepted that the physical proximity to the town centre is the only consideration when contemplating potential for private car dependency. If comparisons are to be drawn, this sound be done balancing of proximity to shops, services and community, commute distance via public transport / active travel to work, school, leisure and the overall health and well-being benefits of access to the wider countryside offered by Land south of Coychurch. Turning back to Parc Afon Ewenni, the housing trajectory for the County Borough expects delivery of the first 35 dwellings per year thereafter until 2023/33. Firstly, this timeframe for delivery is deemed unrealistic even applying an ambitious turnaround of an outline planning application, reserved matters and submissions required	De-allocate Parc Afon Ewenni as it is not considerable preferable over Land South of Coychurch in terms of connectivity and due to doubts regarding its deliverability	As detailed within the Spatial Options Background Paper, the Spatial Strategy s land use framework that helps realise the regeneration aspirations and priorities of the need to deliver future housing requirements up to 2033. The undeveloped brow isettlements that demonstrate strong employment, service and transportation essential to implement the long term regeneration strategy embodied within the represents a necessary degree of continuity form the existing LDP. For Parc Afon Ewenni, the Council has now removed the site from the housing t subsequent uncertainty relating to delivery timescales. The Candidate Site Asses updated to reflect this constraint, of which states that 'the site is located withi Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). T allocation from the existing LDP (REG1(6)) and is proposed to be developed f uses. However, the Council will not seek to allocate Parc Afon Ewenni due to timescales as a result of flood risk.
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y seeks to continue to provide a s of the Council, whilst balancing ownfield regeneration allocations with sustainable urban growth in on functions. This approach is ne Replacement LDP Vision and

g trajectory due to flood risk and sessment (2022) report has been thin the settlement boundary of a The site represents a 'Rollover' d for commercial and residential ntifies that the site is significantly evelopment in the Replacement to the uncertainty over delivery

to address potentially complex contamination and remediation requirements that may be reserved by condition (and associated licencing / permit arrangements). Whilst it is accepted that an alternative cost-effective remediation strategy / solution for the brownfield site has been undertaken and therefore resolving one of the constraints in respect of bringing the site forward (i.e. the abnormal costs deterring a potential development partner), deliverability of the site for residential development is still fundamentally guestioned. The Parc Afon Ewenni site remains in multiple ownership. As evidenced by the non-delivery during the current Plan Period, such complexities make collective landowner agreement to enable on-site delivery of homes problematic, regardless of the extent of flood risk, transportation and other survey work undertaken to demonstrate that physical development of the site is possible in the future. Likewise, given the impending changes to the NRW flood maps this year and the associated requirements of TAN 15 (Development and Flood Risk), the technical justification relating to flood risk at Parc Afon Ewenni, due to parts of the site falling within Zone C2 is likely to need to be re-visited given the vulnerability of residential use. With regard to rolling-over sites, the Home Builders Federation likewise have previously raise concern / caution against the overreliance on roll-over sites within the County Borough, stating: "a large element of the proposed housing supply is associated with such sites [roll-over sites] putting at risk the ability of the plan to deliver, as has been seen by the previous plan which included the same sites a similar strategy". It is not considered that the Council can robustly demonstrate that agreement between landowners to enable the delivery of the site by 2024/25 as set out in the Deposit Plan has be achieved, notwithstanding the continued suggestion that this is possible due to "efforts put in over the last 18 months". We are not aware that Parc Afon Ewenni has a residential development partner / house-builder onboard and that the Memorandum of

Understanding provides sufficient certainty regarding deliverability within a reasonable timeframe. As such, there remains a significant amount of doubt regarding delivery of this site for 675 dwellings as proposed within the Deposit Plan and therefore the allocation additional sites (for example land south of Coychurch) for the delivery of the required housing numbers in east Bridgend should be considered in further detail. In view of the above, it is not considered reasonable to conclude that the Parc Afon Ewenni offers sustainability benefits over Land south of Coychurch for residential use. It is therefore considered that this is not a robust justification to not proceed to allocate the site for new homes.

## Loss of Agricultural Land

As set out above, one of the given reasons for not proceeding to allocate the site for residential allocation within the Deposit Plan is due to the expected loss of good quality agricultural land. As previously advised, the Agricultural Land Classification & Soil Resource Summary Report (WYG, April 2020) confirms that the candidate site agricultural land is comprises areas of non-agricultural, and Grades 3a, 3b and 4 land. In respect of the development area, Grade 3b (Moderate Quality Agricultural Land) is predominant with a channel of Grade 3a (Good Quality Agricultural Land) land running through the central area of the site. Based on the assessment of the soil profile of the candidate site, the Grade 3a land accounts for just 22% (5.67 ha) of the site area. It is maintained that the isolated area of identified Grade 3a agricultural land and its limited % area means that the site is not deemed to form viable agricultural land. It is argued that the proposals therefore do not result in the loss of meaningful areas of 'best and most versatile' agricultural land, that would otherwise be utilised for agricultural purpose is the residential development were not to proceed. As such, it is not deemed that loss of agricultural land is a reasonable ground to

Allocate Land South of Coychurch (Candidate Site ref: 221.C3) as it is not deemed that loss of a reasonable ground to discount the site for residential development

Considerable weight has been given to protecting Best and Most Versatile Agricultural Land from development (alongside other planning considerations) throughout LDP preparation and the assessment of Candidate Sites. Background Paper 15 provides more contextual analysis to clarify how this principle has been embedded into the site selection process, specifically from Stage 2 of the Candidate Site Assessment. This further justifies the proposed allocations within the Replacement LDP in this respect, alongside the SA/SEA and Candidate Site Assessment Methodology. The representor is not considered to have provided justification that there is an overriding need for this development, over and above the proposed Deposit Plan allocations, and therefore this proposal is not supported.

38 394	Support	None None	Comments noted. Comments noted.
38 394	In summary, the rationale provided for discounting the site from the Candidate Sites Assessment and Sustainability Appraisal process is not based on robust and credible justification, nor gives due consideration to strategies available to apply design or policy mitigation (for example: education and active travel, like have been applied to the strategic sites). In view of the above, the Deposit Plan is therefore not considered to meet with the tests of soundness, clearly applies a bias towards strategic sites and is therefore deemed to be 'unsound' on this basis. As set out in the overarching representations submitted on behalf of Persimmon Homes West Wales, concerns have been raised regarding the robustness of the phasing / trajectory of the housing numbers put forward in the Deposit Plan and therefore ability to meet housing requirements over the Plan Period. The Deposit Plan indicates; "A combination of different site typologies is necessary to deliver the growth requirements of the LDP. These include a limited number of Sustainable Urban Extensions, supported by Edge of Settlement Allocations and Local Settlement sites" (paragraph 4.3.53). It is evident that to achieve this, the Council need to allocate more realistically deliverable additional edge of settlement sites, in addition to those currently proposed within the Deposit Plan. Persimmon Homes West Wales therefore object to the exclusion of the Coychurch site within the Deposit Plan and encourage further dialogue from the Council regarding the allocation as a deliverable additional option for up to 512 homes within Deposit Plan Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1.	None	Strategy. These included Regeneration Sites, Sustainable Urban Extensions Local Settlement Sites. The Council has taken into account the full SA site Appendix G of the Sustainability Appraisal, to select an appropriate suite of infrastructure proposals to meet identified needs. Informed by this SA Report, Report confirms and provides reasoned justification for the outcome of the sit each candidate site. In relation to Land South of Coychurch, the Candidate Site Assessment states "The candidate site is located on the periphery of Bridgend which is identified a defined by SP1). The proposed development would look to provide 500 home impact on local education provision without providing a new education fac compared to the other sites in Bridgend that are carried forward as allocati sustainable in that it is located further from the town centre with poor pedestr this site would result in an increase in the dependency on the private car and shift to more sustainable forms of active travel. The development would also agricultural land. Therefore this site is not specifically allocated in the Deposit I Whilst the representor's comments are noted, it is not considered necessary to a the Replacement LDP's housing requirement. As illustrated within the housir sites collectively demonstrate that the Anticipated Annual Build Rate (AABR) v the plan period without Land South of Coychurch being allocated.
	discount the site for much needed residential development. <u>Summary</u> In summary the rationale provided for	Allocate Land	The Preferred Strategy identified a range of potential types of sites that constrategy. These included Regeneration Sites, Sustainable Urban Extension

I deliver the Growth and Spatial , Edge of Settlement Sites and assessment findings detailed in f proposed site allocations and the Candidate Site Assessment e selection process in respect of

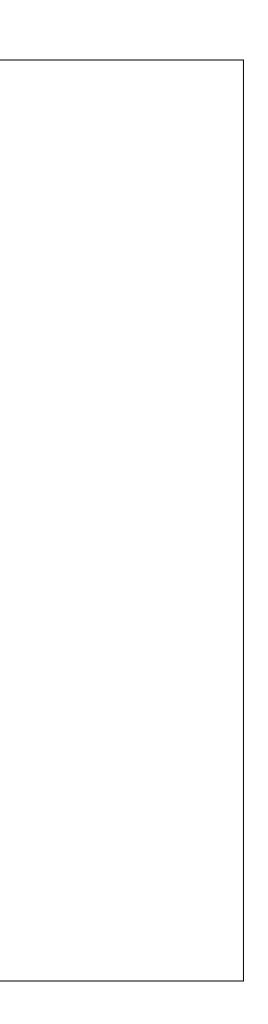
s a Sustainable Growth Area (as s which would have a significant ility on site. Additionally, when ons in the Plan, the site is less an connectivity. Development of herefore not encourage a modal result in the loss of good quality Plan".

llocate this site in order to deliver g trajectory, the other proposed ill remain deliverable throughout

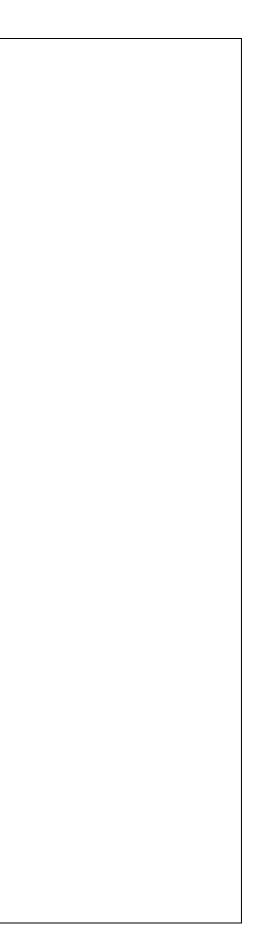
1388	Letter of support for Strategic Site- Land West of Bridgend, also raising additional comments and concerns regarding misinformation being circulated by objectors. I write in support of the proposed allocation at West Bridgend which is the product of a comprehensive assessment of the site and its context. The submission of the West Bridgend site for consideration, was accompanied by a suite of technical reports and found acceptable in the planning balance, to deliver housing in a sustainable location and duly included within the Deposit Consultation Document. This proposed allocation is for open market and affordable housing, together with a community hub and primary school, as well as extensive areas for nature conservation, trim trail, parks and play areas. The obligation on Bridgend to Review their Local Development Plan has resulted in this current draft which is attracting many representations. These include a template letter prepared and circulated by Councillors to rally objection. The concerns I wish to raise on behalf of the landowners and site promoter is the mis informed rhetoric being presented as fact. Both the template letter	proposed. Representor supports the allocation of Land West of Bridgend	Comments noted. All allocations have been proposed based on the outcome of the Candidate Site A with the National Sustainable Placemaking Outcomes, the Gateway Test applied and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. are considered to demonstrate delivery in accordance with the requirements set of Manual. All strategic sites key to the delivery of the plan have been subject to grea support their delivery, including schematic frameworks, phasing details, key trans 10 requirements, design parameters, s106 requirements, infrastructure and costs. degree of confidence that the sites included within the Deposit Plan are realisticall full plethora of associated development requirements, infrastructure provision necessary to deliver high-quality new communities.
	and the later individual objection posted by Councillor Charles Smith contain inaccuracies which are summarised in bold black text below, with a response in red.		
	Template/letter of Objection		
	Further housing is not necessary at this location.		
	REPLY on behalf of Llanmoor Development Co. Ltd.		
	<ul> <li>An evidence base has been created as part of the LDP supporting documentation.</li> </ul>		
	<ul> <li>No justification or reasoning is given of why an additional 850 houses would constitute bad planning? The LDP Review supporting documents and Preferred Strategy form the</li> </ul>		

e Assessment, their compatibility lied to the site search sequence sis. All new proposed allocations et out in the Development Plans greater evidence requirements to ansport corridors, critical access sts. This process provides a high cally deliverable, considering the ion and placemaking principles

 1	
basis of the proposed allocations in the LDP	
Review and justify why urban edge sites,	
such as West Bridgend, are the preferred	
location for the majority of growth, in	
accordance with Future Wales and PPW 11.	
• The reference to site profitability should	
refer to the comprehensive viability report	
accompanying the site promotion, which has	
been prepared in conjunction with the	
Councils Viability Consultant Burrows	
Hutchinson (dated March 2021), and	
confirms that the site is viable and can deliver	
all relevant and appropriate obligation	
• Affordable housing will be provided to the	
<b>2</b> .	
Council through a Section 106 Agreement	
and as is normal practice the prices will be	
based upon a percentage of ACG (42% of	
Acceptable Cost Guidelines, Band 4), or	
Market Value (LCHO 70% of MV), which will	
mean the houses are truly affordable and	
available to young people.	
Infrastructure is not in place to support	
further development.	
REPLY on behalf of Llanmoor Development	
Co. Ltd.	
• The LDP Review team in association with	
the education department are duty bound to	
assess school catchments areas and	
capacity as part of the evidence base for the	
formulation of the LDP Review and the	
preferred strategy. Accordingly, the proposed	
strategic allocations have been progressed in	
line with this process and the onsite provision	
of a primary school and off-site contributions	
to secondary and further education are	
factored into the viability appraisal for the	
site.	
A Community Infrastructure sum of	
£12,665,330.00 has been included in the	
viability report, £11.35m is allocated for	
education purposes, to be allocated for use	
across nursery, primary, secondary and	
further sectors.	



	• Drainage has been assessed by DCWW		
	and they have confirmed that a connection to		
	•		
	accommodate the development for FW can		
	be provided. SW will be dealt with via SUDS.		
	• A full utilities and services report has been		
	prepared and was submitted as part of our		
	evidence base and confirms that all services		
	are available, and the viability report reflects		
	the anticipated costs of delivery of these		
	services.		
	• NHS and Local Health Board have been		
	consulted with no responses received to		
	date, albeit they were represented at the last		
	meeting held with the Council about		
	trajectory (A health Impact Assessment was		
	submitted in July 2020 in support of the		
	proposal).		
	Further along the A473, air quality testing		
	in Park Street reveals it to be one of the		
	most polluted locations in the county.		
	Generating more traffic to use the A473		
	-		
	violates the sustainable development		
	principles contained in the draft LDP.		
	REPLY on behalf of Llanmoor Development		
	Co. Ltd.		
	• An air quality report was included (revision		
	3rd July 2020) with the site submission and		
	• •		
	confirms that the site will not adversely affect		
	the area around Park Street impacted by air		
	quality. The submitted report confirms the		
	whole of the development at West Bridgend		
	would have a negligible effect on air quality.		
	Further read traffic would also put further		
	Further road traffic would also put further		
	strain on the A473 junctions with Elm		
	Crescent and Heol y Nant, the traffic lights		
	at Bryngolau, and the A48 Broadlands		
	roundabout, which is already strained for		
	capacity.		
	REPLY on behalf of Llanmoor Development		
	Co. Ltd.		



• The Vectos Traffic Report confirms that the development will have no detrimental effect on the existing infrastructure.

• A further Strategic Transport Assessment prepared to support the LDP Review has been conducted by Mott McDonald commissioned by BCBC to reveal any strategic improvements which might be necessary to be delivered and supported financially by this development. The outcome of this report is awaited and if any issues are raised these will be acted upon.

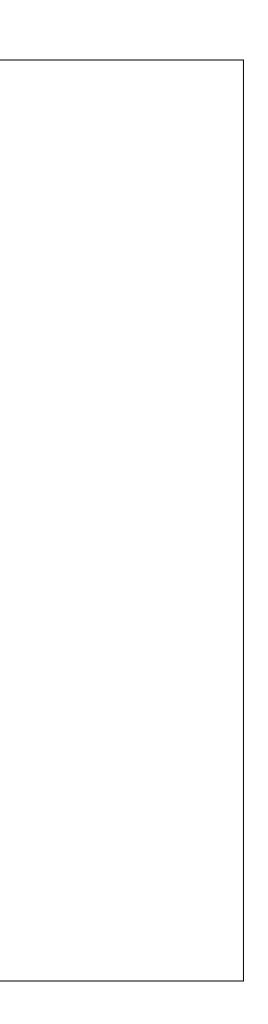
The site would coalesce the community boundaries of Bryntirion and Laleston, contrary to good planning principles. It is an Area of Special Landscape and outside the Settlement Boundary.

REPLY on behalf of Llanmoor Development Co. Ltd.

• In line with Future Wales and PPW11, sustainable, mostly urban edge sites are the chosen locations for future growth in the Review of an LDP. Accordingly, detailed assessments are made of these past designations which are up for review like open countryside, special landscape and settlement boundaries.

• The EDP Landscape and Visual Appraisal report assesses the landscape impact reviewing national and local policy, landscape character and visual amenity. The findings confirm that the site relates well both in landscape and visual terms to the existing landscape and settlement, and that the site represents a logical extension to Bryntirion provided a considered design is sensitive to the site's existing characteristics. The draft Masterplan reflects these design principles.

• The design appraisal and masterplan of the site ensures a well thought out proposal which responds sensitively to assets on site such as the Bridgend Circular Walk, the Byway, the hedgerow network and vegetated site boundaries.



• The masterplan framework proposed for the site has been sensitively designed through a landscape and ecology-led approach, with appropriate incorporation of mitigation measures including a wide landscaped buffer zone on the western edge to set a defensible boundary in order to address concerns of the site in relation to landscape and visual matters.

• The retention of the SINC area to the north of the site also provides protection to the potential heritage assets located off site to the north and creates a defensible boundary to control any future development of the land to the north towards Pen Y Fai.

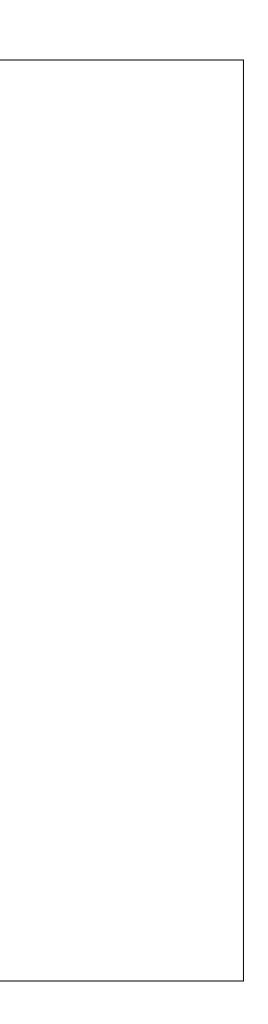
The site has an inherently rural aspect, It forms a green wedge bordering a ward that is officially rural, and a ward that is officially urban.

REPLY on behalf of Llanmoor Development Co. Ltd.

• The purpose of the Landscape Appraisal by EDP, submitted with the site promotion was to inform the design evolution of the scheme which enabled an integrated approach to potential landscape and visual opportunities and constraints. The emerging scheme has sought to meet the LPA's need for housing on a site which is identified in the Preferred Strategy and suggests that development of this site is acceptable in principle.

• A promotion of this site for residential development has been considered an acceptable extension to the existing settlement of Bridgend and Bryntirion to the east with no significant or wide-ranging adverse effects upon its surrounding landscape context.

This green wedge is the location of the Laleston Stones Trail, and the Bridgend Circular Walk, and is a field, woodland and hedgerow system with an historical heritage.



REPLY on behalf of Llanmoor Development Co. Ltd.

• An Archaeology & Heritage Report (EDP) has been submitted and the baseline data indicates the likelihood of significant archaeology being present is low. Any remains would be located within the SINC area to the north of the site which is to remain undeveloped.

The proposed site is criss-crossed by public rights of way which have been conscientiously maintained by the Community Council and which are highly valued by local people and visitors.

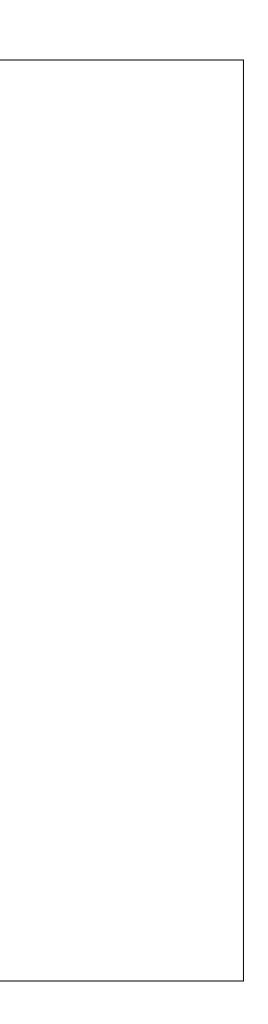
REPLY on behalf of Llanmoor Development Co. Ltd.

 Any PROW will be maintained and protected or diverted within the development and if diversions are necessary to locations appropriate to minimise their urbanisation. The central "lane" will be maintained with hedges on both sides, and the development of the site will allow public access will to a much wider area than is currently legally permitted. Please remember that most this land is held in private ownership and is not available for the public to roam freely. The site proposal has a circular walk and trim trail for public use and enjoyment.

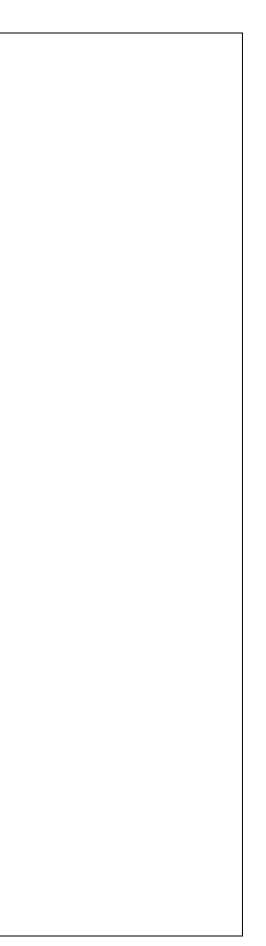
No evidence has been produced to show that the commercial benefits of building at this location would more than outweigh the loss of positive social value of the site in its current condition.

REPLY on behalf of Llanmoor Development Co. Ltd.

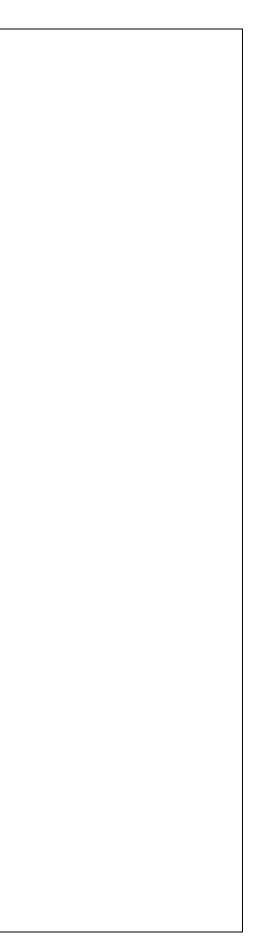
 All the land is in private ownership with public access currently limited to PROW only. The development of the site would offer positive social value by enabling wider access, delivery of a nursery and primary school and a central hub facility as is now



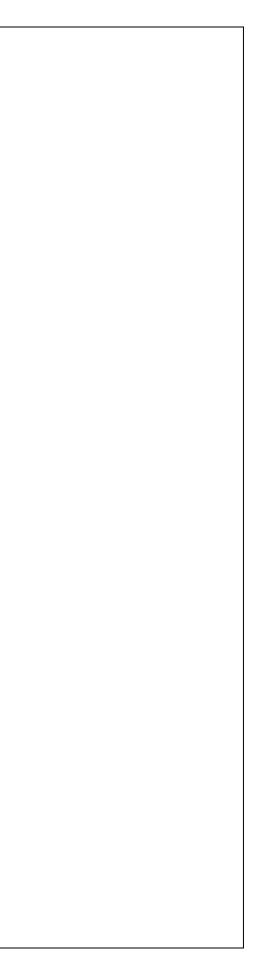
b	being encouraged by Welsh Government to		
e	enable and encourage remote working and		
p	promote less car-based journeys. The future		
c	development of the site is supported by a		
s	suite of evidence based technical documents		
v	which have assessed the impacts and		
b	penefits of the proposed development to		
e	ensure a planning balance can be achieved		
te	o meet the policy makers requirements and		
t	he communities' future needs.		
_	The less of the risk and diverse flows and		
	The loss of the rich and diverse flora and		
	auna of the woodland, fields and		
	nedgerows is not justified by any		
-	commercial benefit from this		
C	development.		
F	REPLY on behalf of Llanmoor Development		
	Co. Ltd.		
	50. Eld.		
•	The SINC in the northern section of the site		
	s to remain protected, with the option for this		
	o be handed to the Council (together with a		
	bayment for future maintenance) for long		
-	erm protection.		
•	Hedgerows and trees are being maintained,		
	other than where it is necessary to transect		
	hem to facilitate access for roads or		
	cycleways/footpaths between the fields.		
	· · · · · · · · · · · · · · · · · · ·		
•	Generally, the land is currently intensively		
fa	armed and therefore has a low biodiversity		
	value.		
•	The development of the site has the		
p	potential to increase the biodiversity offer and		
V	value of the site.		
_	This urbanisation would create an		
-	undesirable precedent for further		
U	urbanisation to south, north and west.		
	PEDI V on hohalf of Llanmoor Dovelopment		
	REPLY on behalf of Llanmoor Development		
	Co. Ltd.		
	The future growth of Bridgood will be		
	The future growth of Bridgend will be		
g	governed by politicians and policy makers.		



	-	· · · · · · · · · · · · · · · · · · ·
• The boundaries to the north and west are protected by buffer zones, including the SINC to the north. The likelihood is that these areas will be offered to the Council for adoption, together with an appropriate maintenance payment, this will allow the Council to control any further development of land to the North and West.		
The proposal to close Llangewydd Road to vehicular traffic is undesirable and disingenuous. Undesirable because this lane is already a popular walking and cycling route, and vehicular traffic coexists without difficulty on this stretch.		
REPLY on behalf of Llanmoor Development Co. Ltd.		
• The purpose of proposing to close the lane to traffic is in fact to enhance the ability for pedestrians and cyclists to use this route, to and from the development and the wider area. There are no existing footpaths or cycleways along this route at present, which is currently a danger to such users.		
Alternative routes have not been suggested by the developer. These are disingenuous, because no evidence has been put forward to argue for the closure of Llangewydd Road!		
REPLY on behalf of Llanmoor Development Co. Ltd.		
• The Highway Statement which accompanied the submission of this site promotion evaluates the safety issues relating to the closure of Llangewydd Road as part of the overall proposal.		
• As referenced earlier, the intent would be to pass land over to the Council who would then be in control of any further development towards Penyfai. Indeed, the Council as Planning Authority has total control over the direction of future growth.		



_			
	The closure of the road is not a way of achieving this outcome! This proposal puts the wrong type of development with the wrong type of houses in the wrong		
	location.		
	REPLY on behalf of Llanmoor Development Co. Ltd.		
	• The development is proposed in a sustainable location and will provide a range and choice of housing including "affordable homes" as determined by the Council and delivered through a Section 106 Agreement.		
	• The development would also make a financial contribution to education and active travel as well as providing large amounts of POS and publicly accessible playing fields and facilities within the school area.		
	The applicant's intension is to destroy trees and mainly consists of Grade 2 agricultural land; the highest grade available in Wales.		
	REPLY on behalf of Llanmoor Development Co. Ltd.		
	• The site proposed for a residential allocation in the Deposit Consultation Document does not comprise any Grade 2(Best and Most Versatile) agricultural land.		
	• The agricultural land assessment of the site demonstrates the land does not fall within the Best and Most Versatile Category, but is instead Grade 3b land.		
	<ul> <li>A detailed arboricultural assessment of the trees on site has been undertaken and submitted. This has been fundamental in determining land parcels for development to</li> </ul>		
	ensure that trees and woodland of quality is retained and incorporated in the masterplan design.		
	This response is prepared and submitted on behalf of Llanmoor Development Company Ltd. They have more than 55 years'		



	experience of constructing brand new homes across South Wales and has an extensive knowledge of the needs and requirements of its home purchasers by means of detailed market research ahead of any development being proposed or commenced. The Company has constructed many hundreds of high-quality brand-new homes on 12 developments across the Bridgend Borough in its years of trading and goes to great lengths to ensure that the homes built are in line with what the home buying public need and desire. Building homes that do not meet with the needs of the community would go completely against the principles of the Company as a very highly respected private Welsh SME home builder.		
1390		Afon Ewenni	Comments noted. However, the Council has now removed Parc Afon Ewenni fro flood risk and subsequent uncertainty relating to delivery timescales. The Cano report has been updated to reflect this constraint, of which states that 'the site is boundary of Bridgend which is identified as a Sustainable Growth Area (as define a 'Rollover' allocation from the existing LDP (REG1(6)) and is proposed to be of residential uses. However, the Council's Strategic Flood Consequences Assess significantly vulnerable to flood risk. As such, the site will not therefore be allo Replacement LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewe delivery timescales as a result of flood risk.
	Background As the Council will be aware, planning permission was granted in March 2018 for the erection of up to 240 dwellings, 1,123 sqm Class A1/A2/A2/D1/D2 use, public open space and highways infrastructure, the extent of the Parc Afon Ewenni site allocation within	retail floorspace on Parc Afon	The (2019) Retail Study has calculated comparison and convenience retail needs shares approach, which assumes that existing shopping patterns will remain sta – 2033). The Study identifies limited quantitative needs across the County Borou in Bridgend (to improve comparison fashion, leisure and the general shopping e improve main food shopping offer). This reflects market trends which are likely to i and commercial leisure floorspace across the LDP period.

rom the housing trajectory due to andidate Site Assessment (2022) e is located within the settlement ined by SP1). The site represents e developed for commercial and essment identifies that the site is allocated for development in the wenni due to the uncertainty over

ds based on the constant market stable over the LDP period (2018 ough and qualitative retail needs environment) and Porthcawl (to o influence demand for new retail our clients' ownership (ref: P/15/368/OUT). Since then, the site owners have undertaken a comprehensive feasibility exercise relating to these proposals in view of the financial commitment associated with the provision of a traffic signal-controlled junction on the A473 (Waterton Road), substantial abnormal costs in the form of contamination and remediation and other Section 106 obligations. The proposed scale of remediation and infrastructure investment necessary to deliver the mixed-use site raises significant commercial difficulties regarding the enabling of the wider development from a funding perspective. This issue will be familiar to the LPA given that we understand a grant funding bid under the Cardiff Capital Region fund was unsuccessful. This identified viability gap has therefore necessitated the need for our client to contemplate alternative options to provide an uplift in land value, that will commercially support the provision of the enabling infrastructure, and in turn, the deliverability of the wider Parc Afon Ewenni allocation. Albeit specifically in respect of housing allocations, PPW 11 states: "To be 'deliverable', sites must be free, or readily freed, from planning, physical and ownership constraints and be economically viable at the point in the trajectory when they are due to come forward for development, in order to support the creation of sustainable communities" (paragraph 4.2.10). In view of the above, these representations are made in support of the allocation of our clients' land ownership for retail allocation for up to 4,000 sqm gross (c.2,900 sqm net sales). The retail allocation remains akin to the original aspiration of the mixed-use allocation Parc Afon Ewenni Regeneration Area – Masterplan Framework & Delivery Strategy (November 2011) and approved by virtue of the extant planning permission ref: P/15/368/OUT, albeit with an increased quantum of 'enabling' retail.

## **Conclusion**

• The Parc Afon site requires substantial infrastructure provision including the creation

A refreshed (2022) Retail Study Update has been undertaken to re-examine retail need within the BCBC area. This Study analysed trends affecting the retail sector which may impact and influence local retailing within the county borough and how this may change over time. It also assessed future needs for comparison and convenience retail floorspace to 2033, based on existing market shares. The 2022 Study now evidences capacity for 12,790 sq.m of additional comparison retail sales area floorspace over the whole plan period (up to 2033) of which there is medium-term capacity for 6,291 sq.m sales area (by 2028). The Study recommends that the comparison need identified should be met within existing town centres in the first instance in accordance with Planning Policy Wales' 'Town Centre First' principle. Refreshed primary survey work has shown there is more than sufficient capacity (i.e. vacancies) within town centres to accommodate the comparison retail sales area floorspace identified. Conversely, the 2022 Study evidences less capacity in the convenience goods sector due to the Aldi foodstore commitment at land at Salt Lake, Porthcawl (Planning Application P/21/835/FUL refers). This leaves capacity for just 403 sq.m of additional convenience retail sales area floorspace over the whole plan period (up to 2033), of which, there is no capacity for additional convenience retail floorspace in the short and medium term. The 2022 Study concludes that the strategic sites offer the best opportunity to deliver the shortfall in convenience through local service centres. There is more than sufficient provision to accommodate the small quantum of additional convenience retail sales needed over the plan period.

The proposal is not considered necessary and the position is outlined within the Retail Background Paper, informed by the Retail Study (2019) and Retail Study Update (2022). The retail need identified will be met by allocating regeneration sites in or adjacent to Bridgend and Porthcawl Town Centres, the re-use and regeneration of vacant units within commercial centres and via local service centres on new strategic sites. This will be complemented by policies in the Replacement LDP which clearly highlight the circumstances where new retail developments will be acceptable outside the centres in the hierarchy. i.e. where they can demonstrate they will complement existing facilities and can be accessed by sustainable forms of transport.

The Council equally recognises the important role that local shopping facilities play in serving their communities and appreciates that their provision can mean a vital service is provided to local people. In areas of new housing growth this may result in the need to provide new local convenience goods retailing either within, or close to, the new development to meet the everyday needs of the residents. This is likely to occur outside of the retailing and commercial centres identified in SP12. Policy ENT6 therefore seeks to facilitate the provision of new locally scaled convenience goods retailing provision where the need can be identified. In the case of large-scale residential or mixed-use developments incorporating a significant element of residential development, there is a case for providing a new retailing centre incorporating other retailing, leisure and commercial uses at a scale and size proportionate to the site as a whole. The Mixed-Use Strategic Development Site Policies (PLA1-5) all provide site-specific requirements for these sites and Require masterplans to be prepared and agreed with the Council prior to development to demonstrate how these principles will be delivered in an appropriately phased manner. Whilst the Infrastructure and Delivery Appendix (Appendix 5) to the Deposit Plan currently sets out key site-specific information for the Strategic Sites only, more detailed information will be included on all remaining housing allocations listed in Policy COM1 and employment sites to improve clarity in this respect. This will set out what is expected from each allocated development and the costs in bringing each site forward.

Moreover, PPW (Edition 11) references the potential impacts of retail developments outside designated retail and commercial centres, including changes "in turnover and trading ability, consumer choice, traffic and travel patterns, footfall, as well as affect centre regeneration strategies and existing or proposed retail sites allocated in the development plan" (para 4.3.25). PPW also states, "all retail planning applications or retail site allocations of 2,500 sq. metres or more gross floorspace that are proposed on the edge of or outside designated retail and commercial centres should, once a need has been established, be supported by a retail impact assessment" (para 4.3.26). The representor's proposal (to allocate 2,900sqm net retail floorspace at Parc Afon Ewenni) is above this threshold, is not based on any identified need and is also not supported by a retail impact assessment.

	<ul> <li>of a new junction on Waterton Road to facilitate access into the site. There is presently a viability gap to deliver the site as currently proposed and that consideration of a wider range of uses is necessary to assist the delivery of the site.</li> <li>This proposed quantum of retail floorspace would be 900sqm net higher than previously allocated in the Adopted LDP under Policy REG5(3), which permits up to 2,000sqm net of A1,A2,A3,D1 and D2 uses. It should also be noted that the site benefits from extant planning permission for 1,123sqm of A1/A2/A3/D1/D2 uses under planning permission (P/15/368) which includes 240 dwellings.</li> <li>The proposed retail element comprises an 1,804 sq m GEA (1,315 sq m net sales) potential discount food store; a 1,858 sqm GEA higher end foodhall retail unit; a 130sq m Coffee Drive Through and a 279 sq m retail pod(s). In all, the above uses would equate to around 2,900sqm net floorspace.</li> <li>The additional provision of 900sqm net above the established Adopted LDP commercial floorspace quantum is therefore considered to be the 'enabling' element which will help to facilitate to the development</li> </ul>		Whilst the representor claims that there is a 'viability gap' due to the 'financial co provision of a traffic signal-controlled junction on the A473 (Waterton Road), sub form of contamination and remediation and other Section 106 obligations', no assessment has been provided to verify these claims. Equally, no viability asse the representor to demonstrate that additional 'enabling' retail would impact po viability in this respect. However, a comprehensive independent viability assessment was undertaken by to and post publication of the Deposit Plan. This assessment, which considered th the whole proposed Parc Afon Ewenni allocation, did not identify any such demonstrated the site was viable and deliverable with 20% affordable housing pro the assumption that the overall development would include a net lettable area o new retail uses, including a small convenience store of 372 sqm (4,000 sq ft), a leve with the existing outline consent. However, and crucially, the conclusions from t extent and use of commercial floorspace is unlikely to have a significant impact, the financial viability of the site as a whole. On this basis, the proposal to allocate 2,900sqm net retail floorspace on P unsubstantiated 'viability gap' is not supported. Indeed, the representor's proposa Town Centre First principle enshrined in national policy and promoted by the Rep
1404	of the wider allocated site. Land at Penylan House, Pencoed should be added as an allocated housing site for circa 81 homes within this area. Please see the enclosed Candidate Site Assessment Report which demonstrates that the site's allocation would contribute to the soundness of the LDP.	Allocate Land at Penylan House, Pencoed	Informed by the Sustainability Appraisal Report, the Candidate Site Assessment Deposit Plan confirms and provides reasoned justification for the outcome of the sit of each candidate site. The proposal to allocate Land at Penylan House, Pencoed represents an alternative that was not submitted at Candidate Site or Preferred Strategy Stage. As state Manual (edition 3), "It is at the discretion of the LPA how to deal with candidate site the preferred strategy consultation" (para 3.27).
219	Bridgend College (BC) is a Further Education (FE) College and the owner of the Pencoed College Campus, proposed as a sustainable	Supports allocation of Land East of Pencoed	<ul> <li>Whilst the representor has provided a high level SA, concept plan, transport ecological appraisal in support of this alternative site proposal, a range of sup missing, including a viability assessment and utilities strategy. A range of ot advanced in terms of their supporting evidence base and, therefore, the represent alternative site is not supported.</li> <li>Comments of support noted.</li> </ul>

commitment associated with the ubstantial abnormal costs in the o independent financial viability sessment has been provided by positively on the development's

by Burrows-Hutchinson Ltd prior d the viability and deliverability of ch viability gap. The appraisal provision. The appraisal included a of 1,115 sqm (12,000 sq ft) for evel of retail provision compatible in this appraisal showed that the ct, either positive or negative, on

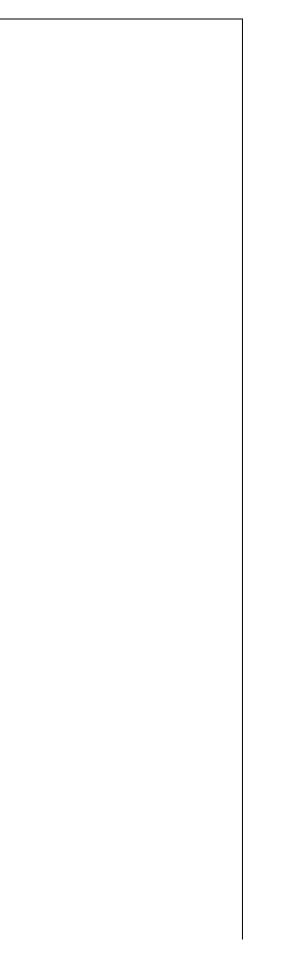
Parc Afon Ewenni due to an osal would be of detriment to the eplacement LDP Strategy.

ent published to accompany the site selection process in respect

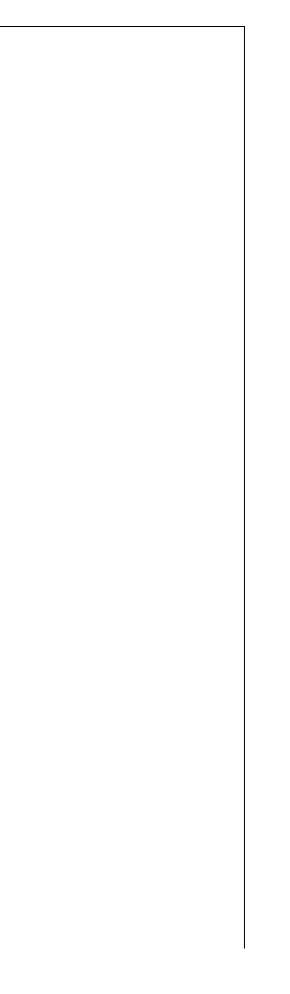
rnative site submission and one ated in the Development Plans sites submitted after the close of

ort appraisal and a preliminary supporting technical evidence is other reserve sites are further sentor's proposal to allocate this

	growth area in the deposit plan under policy	as a means of		
	PLA4. BC has promoted the site and worked	delivering the		
	to provide supporting information and	growth strategy		
	justification for the allocation through the	5		
	revised LDP process to date, including each			
	stage of the candidate site process. BC fully			
	supports the proposed allocation of the			
	Pencoed College Campus site within the			
	revised LDP deposit and wishes to work with			
	BCBC to provide support to the submission			
	and examination process to cement the			
	allocations within the adopted LDP. To that			
	end, support, comments and suggested			
	revisions are set out to ensure that the			
	allocations are robust and can be delivered in			
	an effective manner, and without tension with			
	other polices within the plan or with national			
	policy or guidance. The presence of Bridgend			
	College, a successful FE institution, delivers			
	important economic benefits to the Bridgend			
	economy, and wider region. However, one of			
	the fundamental components to ensuring the			
	College's long term success is the quality of			
	its teaching environment. The delivery of a			
	new, modern facilities requires significant			
	funds, and an important part of the funding			
	package in this case is expected to be			
	derived from the reinvestment of funds from			
	the sale of surplus land and assets benefiting			
	from an allocation in the BRLDP (and			
	subsequently a planning permission) for a			
	higher value use (such as residential).			
	Securing an allocation of the site (and its			
	eventual sale and development) is an			
	important element of the funding to support			
	the ambitious development programme that			
	college has planned, and is in discussion with			
	BCBC over.			
	The proposed ellocation will therefore exclusion			
	The proposed allocation will therefore enable			
	the delivery of significant and strategic			
	projects planned by BC, hence there is a			
	strong incentive to bring the site forward			
	within the early stages following the			
	successful adoption of the revised LDP. House builder interest in the site has been			
	strong and consistent since the first			
	publication of the candidate sites indicating			
	that, following a successful promotion			
	through the LDP, there will be competition			
I			I	

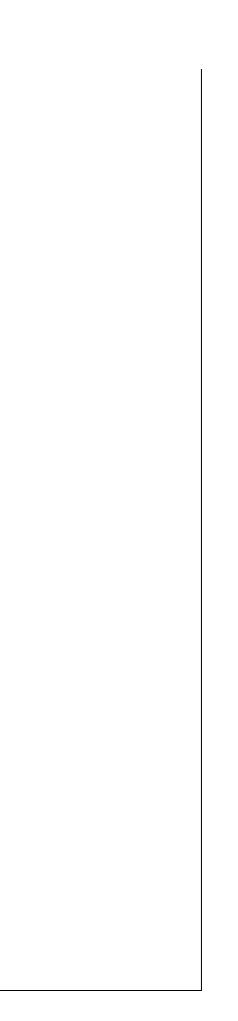


from house builders to secure a position and bring forward housing development on the land. Comments and suggestions are set out on the policies that specifically allocate the sites and the policies that will be relevant to any planning applications on the sites in the future.		
PLA7: Development West of the Railway Line, Pencoed	PLA7: No changes being	Comments noted.
This policy places a moratorium on all development that results in a net increase in vehicular traffic movements west of the railway line in Pencoed. Whilst Bridgend College have no comments to make on the policy itself, the continuation of this approach from the adopted LDP is further evidence of the acceptability of the approach of allocating "Land East of Pencoed" which is to the eastern side of the railway line in Pencoed.	proposed.	
<ul> <li>COM1: Housing Allocations &amp; PLA4 Land East of Pencoed</li> <li>With Policy SP6 (Sustainable Housing Strategy) recognising that housing and strategic allocations will be required to deliver the previously identified housing requirement, Policy COM1 (Housing Allocations) identifies the housing and strategic allocations for the LDP.</li> <li>Since work commenced on the Replacement LDP, Bridgend College has been promoting the Land East of Pencoed site (SP2(4)). BC has worked to provide BCBC with a package of technical documentation to demonstrate that the site is deliverable, sustainable, and viable. Likewise, BC has worked to provide BCBC with information on the site's capacity, the timescales for their delivery, and how they align with the housing trajectory for BCBC.</li> </ul>	SP2(4) and COM1: No changes being proposed.	Comments of support noted.
committed to its delivery, however, there is a requirement to revise the text in relation to the Land East of Pencoed (PLA4) as explained below.		
	<ul> <li>bring forward housing development on the land. Comments and suggestions are set out on the policies that specifically allocate the sites and the policies that will be relevant to any planning applications on the sites in the future.</li> <li><b>PLA7: Development West of the Railway Line, Pencoed</b></li> <li>This policy places a moratorium on all development that results in a net increase in vehicular traffic movements west of the railway line in Pencoed. Whilst Bridgend College have no comments to make on the policy itself, the continuation of this approach from the adopted LDP is further evidence of the acceptability of the approach of allocating "Land East of Pencoed" which is to the eastern side of the railway line in Pencoed.</li> <li><b>COM1: Housing Allocations &amp; PLA4 Land East of Pencoed</b></li> <li>With Policy SP6 (Sustainable Housing Strategy) recognising that housing and strategic allocations will be required to deliver the previously identified housing Allocations) identifies the housing and strategic allocations for the LDP.</li> <li>Since work commenced on the Replacement LDP, Bridgend College has been promoting the Land East of Pencoed Ste (SP2(4)). BC has worked to provide BCBC with a package of technical documentation to demonstrate that the site is deliverable, sustainable, and viable. Likewise, BC has worked to provide BCBC with information on the site's capacity, the timescales for their delivery, and how they align with the housing trajectory for BCBC.</li> <li>BC supports the allocation of the site and is committed to its delivery, however, there is a requirement to revise the text in relation to the Land East of Pencoed (PLA4) as explained</li> </ul>	<ul> <li>bring forward housing development on the land. Comments and suggestions are set out on the policies that specifically allocate the sites and the policies that will be relevant to any planning applications on the sites in the future.</li> <li>PLA7: Development West of the Railway Line, Pencoed</li> <li>This policy places a moratorium on all development that results in a net increase in vehicular traffic movements west of the railway line in Pencoed. Whilst Bridgend College have no comments to make on the policy itself, the continuation of this approach from the adopted LDP is further evidence of the acceptability of the approach of allocating "Land East of Pencoed" which is to the eastern side of the railway line in Pencoed.</li> <li>COM1: Housing Allocations &amp; PLA4 Land East of Pencoed which is to the eastern side of the railway line in Pencoed.</li> <li>COM1: Housing Allocations &amp; PLA4 Land East of Pencoed of the acceptability of the approach of allocating "Land East of Pencoed of the railway line in Pencoed.</li> <li>Since work commenced on the Replacement LDP, Bridgend College has been promoting the Land East of Pencoed site (SP2(4)). BC has worked to provide BCBC with information on the site's capacity, the timescales for their delivery, and how they align with the housing trajectory for BCBC.</li> <li>BC supports the allocation of the site and is committed to its delivery, however, there is a requirement to revise the text in relation to the Land East of Pencoed (PLA4) as explained</li> </ul>



The credentials of the site and the proposed
allocation have been thoroughly assessed,
leading to the proposal to allocate the land
within the deposit RLDP.

The masterplanning work undertaken has provided clarity on the quantum of housing which could be delivered on the Site, indicating that the Site should be allocated for up to 770 new homes. This will make an important and meaningful contribution to meeting BCBC's housing requirement over the RLDP's plan period. Without prejudice to the detailed development proposal to progress in due course, this quantum of development could support the delivery of a new single form entry primary school, ideally (but not critically) on BCBC owned land adjacent to the site. As demonstrated in the Candidate Site submission, the findings of environmental and technical studies confirm that there are no significant constraints to the Site's development, and those known constraints (such as the presence of the gas main across the Site) can be planned around. BC is committed to the promotion of this surplus land at Pencoed College and will		
RLDP. BC welcomes the proposed allocation in the deposit plan and wishes to lend its support to the policy, albeit that refinements to the policy wording are considered necessary to ensure that the development envisaged by the policy can be delivered. Some of the policy is considered too prescriptive at this stage either in terms of what it requires or how it will be communicated or controlled. As set out below BC requests that the policy wording is amended to allow some flexibility is built in to ensure that whilst - well intended - the policy doesn't immediately cause tension or backfire when the plan switches from assessment to delivery mode.	Reduce rigidity of PLA4 policy wording	See responses below.



Comments and concerns about the policy wording as drafted, and suggested changes to the wording are set out below.

## Suggestion 1

The first concern is over the rigidity of the land uses as described within the policy text. Whilst the masterplanning work to date has been as robust as can be expected at land promotion stage, the fine detail of how the site will be developed has yet to be carried out. The detailed planning stage may result in a minor fluctuation to the housing numbers, either up or down.

This degree of flexibility is reflected in policy wording and the supporting text to the policy at 5.2.26 where it states that the site will deliver approximately 770 new dwellings. The flexibility of the supporting text should be continued into the policy wording.

Similarly the 'Development Requirements' section of the policy sets out a rigid set of requirements given that it states that the development must provide the specified requirements that follow.

Setting rigid (even if unintended) housing figures and other requirements could lead to an immediate tension between the policy wording and any proposal that varies even slightly from the requirements.

A similar issue arose during the Swansea LDP examination in respect of the overarching placemaking policy (PS2). The Inspectors report considers this at paragraph 13.51. Whilst in the case of PS2 it referred to a policy that covered all strategic sites the same principle of seeking to avoid an overly rigid set of requirements applies. MAC19 as recommended by the Inspector required that the plan amend the word 'must' to 'should' to would facilitate its flexible application. The same change was required to each of the strategic site policies (see MAC 932 as an example). Adding 'circa' to the land use requirements and replacing the word 'must'



with 'should' will provide the flexibility required (within reason) to ensure that the policy will deliver on its main intention.		
Suggestion 2 Bridgend College recognise BCBC's desire for each of the Strategic Development Allocations to deliver a primary school onsite. Through discussion with BCBC's Education Department, BC has previously been advised that the expected land requirement for a one form entry primary school would be 1.25ha and the Proposed Masterplan prepared by Austin-Smith: Lord responds to this by showing 1.25ha of land for a one form entry primary school.	buffer.	The Council's Education Department have advised that the development will gene primary school. Therefore, the representor's suggested change to PLA4 is not su In the interests of future sustainability, provision of a 1.5 form entry primary school being set aside for construction of the new school, inclusive of a 0.46ha land buff The proposal to remove this land buffer is not supported.
It is not clear what has led to the Deposit LDP including an increased land requirement for the primary school and for a requirement for the provision of a 1.5 form entry primary school rather than a one form entry primary school. A one form entry primary school is clearly appropriate for a development of this scale given that it would most likely provide for the 233 primary school places that the development will generate demand for, supplemented as it will be through capacity within existing English or Welsh medium schools.		
Accordingly, there is a need for Policy SP2(2) to be amended to respond to the masterplanning work that has been done (and the discussions that have informed it) and with consideration of the demand for primary school places that the development will generate. Likewise, Appendix 5 makes reference to the requirement to retain 0.5ha of land for potential future expansion. For the reasons above, this requirement should be removed from Appendix 5.		
Suggestion 3 Analysis undertaken by WSP has demonstrated the suitability of two vehicular access points into the site, one from Felindre Road to the south and a second from the		The Council agrees to this proposed amendment. The specific wording of PLA4 principal point of vehicular access is from the south of the site (off Felindre Road the north of the site (off the A473).

enerate need for a 1.5 form entry supported.

ool will necessitate 2.3ha of land uffer to enable future expansion.

A4 will be revised to ensure the ad), with secondary access from

<ul> <li>A473 into the northern part of the site. Whilst both of these are shown in the masterplan prepared by Austin-Smith: Lord, Policy PLA4 only makes reference to the northern access from the A473 and therefore there is a need for this to be reflected in the wording of Policy PLA4.</li> <li><b>REVISED POLICY SUGGESTION:</b></li> <li>PLA4: Land East of Pencoed, Pencoed Sustainable Growth Area</li> <li>Site Size: 44.27 ha</li> <li>Allocation Type: Strategic Mixed-use Sustainable Urban Extension</li> <li>Land Uses: <b>circa</b> 770 residential units <ul> <li>20% Affordable units</li> <li>2.0% Affordable units</li> <li>2.20% Affordable units</li> <li>2.0% Affordable units</li> <li>3.000000000000000000000000000000000000</li></ul></li></ul>	Proposed changes being sort to Policy PLA4.	Comments noted. However, Development Plans Manual Edition 3 requires the s clearly the number of units (private and affordable) and broad phasing tranches. Ta Table' recommends that the total units in the plan period for each allocation Therefore, Policy PLA2 is considered appropriate in the current form. The Council's Education Department have advised that the development will gen primary school. Therefore, the representor's suggested change to PLA4 is not su The Outdoor Recreation Facilities requirements are considered appropriate in the The Planning Inspectorate has advised that 'must' is appropriate terminology for Management Policies. Therefore, the proposed changes to PLA4 are unsubstan Policy is considered appropriate in its current form and is designed to ensure mor during the Replacement LDP period.
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e site allocations policy to set out Table 17: 'Site Allocations Policy ion should be clearly specified.

enerate need for a 1.5 form entry supported.

the current form.

ofor Strategic and Development antiated and not supported. The more certainty for all stakeholders and promoting more cohesive communities. These principles **should** must be delivered in an appropriately phased manner and be formally tied into planning consent:

a) Create a well-connected sustainable urban extension to Pencoed, comprising a number of character areas that integrate positively with the existing Town Centre, existing housing clusters, community facilities, Active Travel networks, Pencoed Technology Park, Pencoed Comprehensive School and public transport facilities;

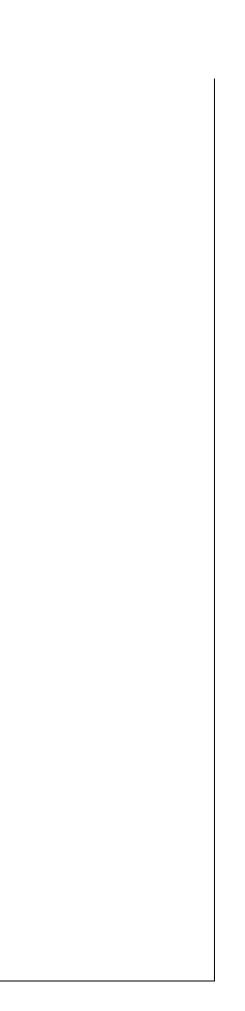
b) Create a multi-functional green infrastructure network within the site that facilitates active travel, taking account of the need to create healthy communities. There should must be particular emphasis on: creating a linear park or road network along the route of the high pressure gas main, retaining existing trees and hedgerows within the public realm, incorporating appropriate protecting biodiversity, landscaping, facilitating habitat creation and supporting a range of opportunities for formal and informal play in addition to community-led food growing;

c) Pursue transit-orientated development that prioritises walking, cycling and public transport use, whilst reducing private motor vehicle dependency. Well designed, safe walking and cycling routes **should** must be incorporated throughout the site to foster community orientated, healthy, walkable neighbourhoods;

d) Orientate buildings to face open spaces and streets to enhance cohesiveness **where practicable**, foster a strong sense of place and ensure community safety;

and

e) Provide a mix of higher densities at key points in the layout and lower densities on the rural/sensitive edges.



DEVELOPMENT REQUIREMENTS	Proposed changes being	Comments noted, however, the Planning Inspectorate has advised that 'must' is Strategic and Development Management Policies. Therefore, the propose
The development <b>should</b> must provide the following requirements:	sort to Policy PLA4.	unsubstantiated and not supported. The Policy is considered appropriate in its cu ensure more certainty for all stakeholders during the Replacement LDP period.
1) <b>circa</b> 770 homes, incorporating an		With reference to the specific suggestions:
appropriate mix of dwelling sizes and types to meet local housing needs, including 20% affordable housing units to be integrated throughout the development in sustainable clusters of no more than ten units as per the Council's requirements;		<ol> <li>The representor's proposal to remove reference to clusters of ten affordable rationale for this policy requirement is clearly set out in the Affordable Hous consistent with Policy COM3. Delivery of affordable housing through sustain ten affordable units, interspersed throughout the respective developments, ensure delivery of balanced, mixed-tenure, sustainable communities. Discu affordable units can otherwise become increasingly unconducive to the otherwise bec</li></ol>
2) <del>2.3</del> 1.25 hectares of land to accommodate a <del>1.5</del> 1 form entry primary school with		balanced, mixed tenure communities.
colocated nursery facility and a proportionate financial contribution to nursery, primary, secondary and post-16 education provision as required by the Local Education Authority. The financial contribution (including timing and phasing thereof) must be secured		2) The Council's Education Department have advised that the development wil entry primary school. Therefore, the representor's suggested change to P interests of future sustainability, provision of a 1.5 form entry primary school being set aside for construction of the new school, inclusive of a 0.46ha expansion. The proposal is not supported.
through Section 106 Planning Obligations in accordance with the Education Facilities and Residential Development SPG.		4) The specific wording of PLA4 will be revised to ensure the principal point of south of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north of the site (off Felindre Road), with secondary access from the north
The school must be accessible to new and existing residents by all travel modes, enabled by the development;		5) Para 5.109 National planning policy (PPW) states the provision of adequate deliver the plan is essential. It is essential that strategic site policies reference of the plan is ensure consistency with the Development Plans Man clearly indicate when proposals and allocations are expected to come for infrastructure, identify necessary infrastructure improvements and clearly states and clearly states are expected to come for infrastructure.
3) Green Infrastructure and Outdoor Recreation Facilities to be delivered in accordance with Policy COM10 and Outdoor		fund such improvements at what point in the plan period to facilitate develo is considered appropriate in its current form and is designed to ensure more during the Replacement LDP period.
Recreation Facilities and New Housing Development Supplementary Planning Guidance;		6) The Replacement LDP aims to reduce private car reliance and help the principles set out by the Active Travel (Wales) Act 2013, with the ultimate air upon the current active travel routes as identified in the Existing Route Map
4) Provide vehicular access from Felindre Road and /or the A473 Deliver highway improvement to ensure the principal point of vehicular access is off the A473;		Bridgend County Borough Council has produced Active Travel Network Ma cycling routes required to create fully integrated networks for walking a education, services and facilities. The Council's Active Travel Network Map network of active travel routes and facilities in the County Borough ove
5) Provide off-site highway improvements with regard to the requirements arising		information is contained in the Active Travel Network Maps which can be view The Active Travel Network Maps aim to improve access to key services
through assessment of the proposals at planning application stage from the Transport Assessment and as identified in the Transport Measures Priority Schedule.		centres, employment sites, retail areas and transport hubs, improved acces as schools and colleges and improvements to, and expansion of, the exist the County Borough.
and manoport measures r nonty conclude.		The routes and proposals shown on the Active Travel Network Maps are in be subject to change as routes are further developed. Opportunities sho

' is appropriate terminology for osed changes to PLA4 are current form and is designed to

able units is not supported. The using Background Paper and is ainable clusters of no more than is, is considered fundamental to screte clusters of more than 10 e delivery and maintenance of

will generate need for a 1.5 form > PLA4 is not supported. In the pol will necessitate 2.3ha of land ha land buffer to enable future

of vehicular access is from the h of the site (off the A473).

ate and efficient infrastructure to ference the IDP and Transport anual that states 'LDPs should forward, links to any required state who will be responsible to elopment'. Therefore, the Policy ore certainty for all stakeholders

e County Borough achieve the aim of improving and expanding aps.

Maps to identify the walking and g and cycling to access work, laps set out detailed plans for a ver the next 15 years. Further viewed on the Council's website. es and facilities including town cess to education facilities such isting strategic cycle network in

e indicative alignments that may should be maximised to further

219	proposed for allocation as the Pencoed		improve upon these routes, providing walking connections which will al developments and existing communities. Implementation of this policy will be facilitated through the development development proposals, the design layout will be considered and priority of that incorporate walking and cycling. A high quality design which makes distinctiveness of communities and places will be essential in ensuring walk and popular option of travel. Developers should therefore ensure the key prin to deliver active travel. Adherence to the Active Travel Act Design Guidance can aid in the delivery of standards of good practice. Consideration of active travel will be key during the master planning of Borough. Reference to the Active Routes detailed in Policy PLA2 in conjunce be considered essential in the delivery of any strategic site or any proposal, contributing to the promotion of a sustainable and healthy lifestyle. The Po in its current form and is designed to ensure more certainty for all stakeho LDP period.
219	Bridgend College is the owner and promoter of the Land East of Pencoed, a	allocation of Land	Comments noted.

allow integration between new

ent process. When considering y will be given to the proposals es a positive contribution to the alking and cycling is an attractive rinciples of design are employed nce and other relevant guidance

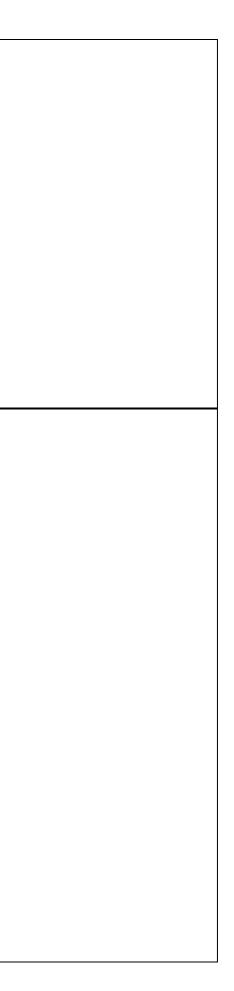
of strategic sites in the County nction with Policy PLA12 should al, ensuring that development is Policy is considered appropriate nolders during the Replacement

	housing trajectory for BCBC. Bridgend College supports the proposed allocation of Land East of Pencoed within the revised LDP deposit and wishes to work with BCBC to provide support to the submission and examination process to cement the allocations within the adopted version of the LDP. To that end, support, comments and suggested revisions are set out to ensure that the allocations are robust and can be delivered in an effective manner, and without tension with other polices within the plan or with national policy or guidance. Comments and suggestions are set out on the policies that specifically allocate the sites and the policies that will be relevant to any planning applications on the sites in the future. Please see additional information submitted.	
399	Parc Afon Ewenni Parc Afon Ewenni is also allocated in the Adopted LDP for 650 units. The site is rolled over in the Replacement LDP (675 units). To date, the site has failed to deliver due to complex land ownerships (as identified by BCBC in the LDP Review Report). The LDP Review Report states that the landowner and Section 106 issues have been resolved and "the application was considered by Development Control Committee in September 2017 where planning permission was granted and the Section 106 Agreement was signed 2nd March 2018". Despite the Section 106 Agreement being signed in 2018, no progress has been made on the site 3 years later. Indeed, an application was submitted in December 2020 (Application Ref: P/20/1017/RLX) to extend the time for submission of reserved matters for an additional three years, further calling into question the site's deliverability. 3.7 Furthermore, it should be noted that this permission was granted pre-SAB regulations and in advance of placemaking and green infrastructure coming to the forefront of development proposals. To allow for SuDs / green	The Council has now removed Parc Afon Ewenni from the housing trajectory due to uncertainty relating to delivery timescales. The Candidate Site Assessment (2022) reflect this constraint, of which states that 'the site is located within the settlement b is identified as a Sustainable Growth Area (as defined by SP1). The site represents the existing LDP (REG1(6)) and is proposed to be developed for commercial and res Council's Strategic Flood Consequences Assessment identifies that the site is sign risk. As such, the site will not therefore be allocated for development in the Replac Council will not seek to allocate Parc Afon Ewenni due to the uncertainty over delive flood risk. Nevertheless, an appropriate flexibility allowance (10%) has been embedded into the for which is clearly set out in the Housing Trajectory Background Paper. The flexibilit fact that there may be certain specific circumstances, unknown at the plan making s of sites, notwithstanding the robust frontloading of site delivery evidence. This is a chosen specifically to enable the Replacement LDP's housing requirement to remai the event that a strategic site fails to come forward as anticipated at this point of pla flexibility allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable even if a significant unforeseen scenario, such as non-delivery of a strategic site, sh

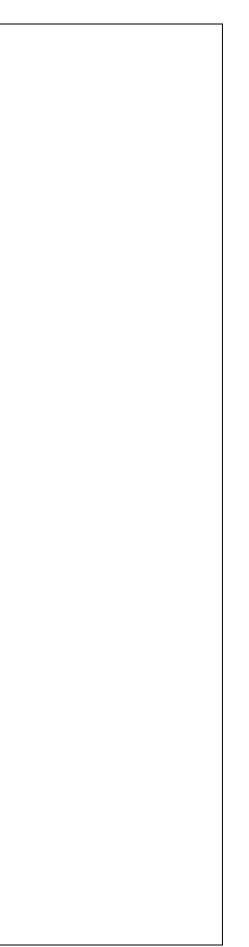
e to flood risk and subsequent 2) report has been updated to at boundary of Bridgend which hts a 'Rollover' allocation from residential uses. However, the ignificantly vulnerable to flood acement LDP'. Therefore, the livery timescales as a result of

the Deposit Plan and the basis bility allowance recognises the g stage, that delay the delivery is a large flexibility allowance, main comfortably deliverable in plan preparation. With a 10% able throughout the plan period should occur.

		1	
	infrastructure / biodiversity net gain etc to		
	be accommodated within the site layout, it		
	is considered highly unlikely that the		
	proposed number of units can in fact be		
	developed in light of reduction in		
	developable site area. 3.8 It is also stated		
	within the LDP Review Report that "The		
	agreed JHLAS (2017) forecasts the site to		
	deliver the remaining units from 2018 to		
	2021 which is slower than anticipated in		
	the phasing of development schedule set		
	out in the LDP". It is therefore		
	acknowledged that the site has been slow		
	to deliver (and in fact development hasn't		
	even started on site), and it is certainly not		
	the case that the remaining units have		
	been delivered by 2021. As such, the		
	deliverability of the COM1(1) is also open		
	to question, in a similar manner to		
	Porthcawl Waterfront.		
407	COM1: Housing Allocations With Policy	No changes being	Comments of support acknowledged.
407	SP6 (Sustainable Housing Strategy)	sought.	
		Sought.	
	recognising that housing and strategic		
	allocations will be required to deliver the		
	previously identified housing requirement,		
	Policy COM1 (Housing Allocations)		
	identifies the housing and strategic		
	allocations for the LDP. Since work		
	commenced on the Replacement LDP, HD		
	Ltd has been promoting the Land South of		
	Bridgend site (SP2(2)) and the Craig y		
	Parcau site (COM1(2)). HD Ltd has		
	worked closely and proactively with BCBC		
	having provided a package of technical		
	documentation to demonstrate that both of		
	the sites are deliverable, sustainable, and		
	viable. Likewise, HD Ltd have collaborated		
	with BCBC with regards to the capacity of		
	the two sites, the timescales for their		
	delivery, and how they align with the		
	housing trajectory for BCBC.		
	Support: Allocation of land on Craig y		
	Parcau site (COM1(2)) for approximately		
	110 new homes and the Land South of		
	Bridgend site (SP2(2)) for approximately		
	847 homes (as part of a wider strategic		
	site).		



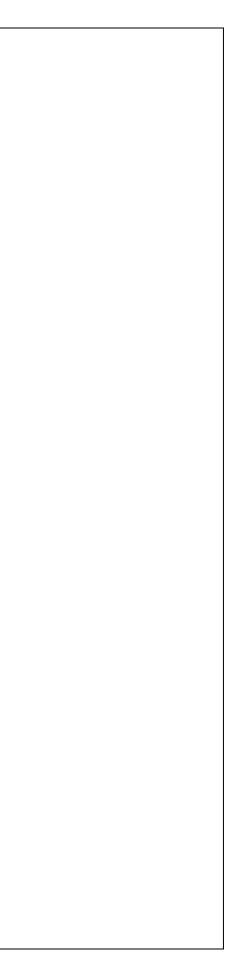
HD Ltd support the allocation of both sites		
and is committed to their delivery,		
however, there is a requirement to revise		
the text in relation to the Land South of		
Bridgend site (SP2(2)) as explained		
below.		
Policies SP2(2) and PLA 2: Land South		
of Bridgend (Island Farm)		
, ,		
The credentials of the site and the		
proposed allocation have been thoroughly		
assessed, leading to the proposal to		
allocate the land within the deposit RLDP.		
In principle, the Site is in a sustainable		
location and is generally free from		
significant physical constraints including		
land ownership, infrastructure, access,		
ground conditions, landscape, heritage		
designations, flood risk issues and		
pollution. It has a positive planning history,		
as it has previously been recognised as a		
suitable location for development. A		
masterplanning exercise has been		
undertaken to ascertain the capacity of the		
Site. This shows that the Island Farm site		
could deliver approximately 847 homes, a		
relocated Heronsbridge Special		
Educational Needs School, a one form		
entry primary school, and a Community		
Indoor Tennis Centre (which it is		
anticipated will be delivered separately		
and in advance of the LDP). Central to the		
masterplanning process has been the		
aspiration to deliver a high quality green and blue infrastructure led mixed-use		
development which responds to the Site's		
unique characteristics. A review of the		
masterplan shows the retention of key		
ecological features and the addition of		
strategic planting, greenspace, and		
attenuation ponds that are not only		
functional in nature but add to the high		
quality nature of the proposals. The		
information submitted to date as part of the		
candidate site process demonstrates the		
technical suitability and deliverability of the		
Site for development, and thus, supports		
the allocation in the Replacement LDP.		



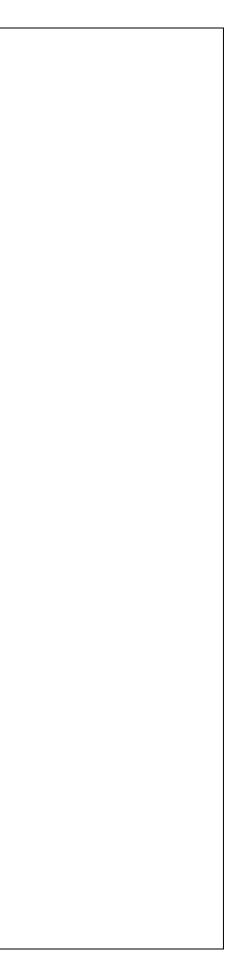
ſ	The Site is free from significant		
	environmental and technical constraints		
	that could preclude development and		
	development is deliverable and a		
	financially viable proposition. The Site has		
	clear potential for new development and is		
	a deliverable allocation in the Deposit		
	RLDP. There are known constraints which		
	will affect the detailed design of the		
	development of the Site, but these can be		
	inherently designed into the scheme,		
	mitigated against and compensated for. In		
	terms of financial viability, the site clearly		
	has development potential for the		
	proposed mix of uses and the site is		
	attractive to the market for development at		
	the proposed location. It has been		
	demonstrated (without prejudice) that		
	based on the high level proposals, the Site		
	can accommodate the level of affordable		
	housing that is targeted in Policy COM3,		
	other policy requirements and		
	infrastructure costs (including a new		
	primary school).		
	HD Ltd is committed to the promotion of		
	the Island Farm Site and will continue to		
	assist BCBC in demonstrating its technical		
	acceptability and deliverability to support		
	its allocation within the emerging RLDP.		
	As per the information provided in the		
	housing trajectory, it is envisaged that an		
	outline planning application will be made to		
	BCBC in 2022. HD Ltd welcomes the		
	proposed allocation in the deposit plan and		
	wishes to lend its support to the policy,		
	albeit that refinements to the policy		
	wording are considered necessary to		
	ensure that the development envisaged by		
	the policy can be delivered. Some of the		
	policy is considered too prescriptive at this		
	stage either in terms of what it requires or		
	how it will be communicated or controlled.		
		Dronseed	Comments noted However, Development Disc. Marcuel Table 47, (Other All-sections)
	As set out below HD Ltd requests that the	Proposed	Comments noted. However, Development Plans Manual Table 17: 'Site Allocations
	policy wording is amended to allow some	changes being	that the total units in the plan period for each allocation should be clearly specified
	flexibility is built in to ensure that whilst well	sort to Policies	considered appropriate in the current form.
	intended, the policy doesn't immediately	Land South of	
	cause tension or backfire when the plan	Bridgend site	
l	switches from assessment to delivery	(SP2(2)) and the	

ns Policy Table' recommends ed. Therefore, Policy PLA2 is

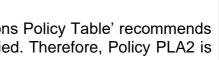
mode. Comments and concerns about the	Craig y Parcau	
policy wording as drafted, and suggested	site (COM1(2)).	
changes to the wording are set out below.		
Suggestion 1		
The first concern is over the rigidity of the		
land uses as described within the policy		
text. Whilst the masterplanning work to		
date has been as robust as can be		
expected at land promotion stage, the		
detailed planning stage may result in a		
minor fluctuation to the housing numbers,		
either up or down. This degree of flexibility		
is reflected in the main policy text and the		
supporting text to the policy at 5.2.15		
where it states that the site will deliver		
approximately 847 new dwellings. The		
flexibility of the supporting text should be		
continued into the policy wording in the		
"Land Uses" tab, the first paragraph, and		
"Development Requirement 1". Setting		
rigid (even if unintended) housing figures		
and other requirements could lead to an		
immediate tension between the policy		
wording and any proposal that varies even		
slightly from the requirements. A similar		
issue arose during the Swansea LDP		
examination in respect of the overarching		
placemaking policy (PS2). The Inspectors report considers this at paragraph 13.51.		See response below.
Whilst in the case of PS2 it referred to a		See response below.
policy that covered all strategic sites the		
same principle of seeking to avoid an		
overly rigid set of requirements applies.		
MAC19 as recommended by the Inspector		
which required that the plan amend the		
word 'must' to 'should' to facilitate its		
flexible application. The same change was		
required to each of the strategic site		
policies (see MAC 932 as an example).		
Adding 'circa' to the land use requirements		
and replacing the occurrences of 'must'		
with 'should' will provide the flexibility		
required (within reason) to ensure that the		
policy will deliver on its main intention.		
Notably this approach was also endorsed		
through the Swansea LDP.		



Suggestion 2	
HD Ltd recognise BCBC's desire for each	
of the Strategic Development Allocations	
to deliver a primary school onsite. Through	
discussion with BCBC's Education	
Department, HD Ltd has previously been	
advised that the expected land	
requirement for a one form entry primary	
school would be 1.4ha and the Proposed	
Masterplan prepared by Roberts Limbrick	
responds to this by showing 1.42ha of land	
for a one form entry primary school. It is	
not clear what has led to the Deposit LDP	See response below.
including an increased land requirement	
for the primary school (of 1.8ha) and there	
is a need for Policy SP2(2) to be amended	
to respond to the masterplanning work that	
has been done and the discussions that	
have informed them. Aligned to this, the	
commentary in Appendix 5 of the Deposit	
LDP needs to be amended to reflect that	
the requirement is to provide a one rather	
than two form entry primary 11	
https://swansea.gov.uk/media/29844/Swa	
nsea-LDP-Examination-Inspectors-	
Report-31-	
Jan2019/pdf/Swansea_LDP_Examination	
_Inspectors_Report_31_Jan_2019.pdf 2	
https://www.swansea.gov.uk/media/2984	
5/Swansea-LDP-Insp-Report_Appendix-	
AMAC-Schedule	
Part1/pdf/Swansea_LDP_Insp_Report_A	
ppendix_AMAC_Schedule	
_Part_1.pdf 17 school (see page 13 of	
Appendix 5 under the sub-heading	
Education – this (we believe) incorrectly	
refers to a two form entry school).	
Suggestion 3	
Suggestion 3 "Development Requirement 7" of the	
"Development Requirement 7" of the	
Policy PLA 2 states that an "emergency	
access" is to be provided through Bridgend	
Science Park. This should be amended to	
reflect that a new vehicular access will be	
created through Bridgend Science Park	
which, whilst acting as an emergency	
access for the residential element of the	
scheme, will be the primary access for the	
relocated Heronsbridge SEN School and	
the Community Indoor Tennis Centre. To	



address the above concerns the following changes are requested to Policy PLA2, with text suggested for deletion struck through and proposed new text added in red.		
<b>REVISED POLICY SUGGESTION:</b>		
PLA2: Land South of Bridgend (Island Farm), Bridgend Sustainable Growth Area Site Size: 49.95 ha		
Allocation Type: Strategic Mixed-use Sustainable Urban Extension	Dreneood	Comments noted Heurover, Development Diene Manuel Table 17: (Site Allegetiene
Land Uses: circa 847 residential units; 20% Affordable Housing; 1.48ha to accommodate a 1 Form Entry Primary School plus Colocated Nursery; 4ha to relocate Heronsbridge Special; Education Needs School; Outdoor Recreation Facilities; Leisure and ancillary commercial uses (B1); a Community Indoor Tennis Centre; Active Travel Routes	Proposed changes being sort to Policy PLA2.	Comments noted. However, Development Plans Manual Table 17: 'Site Allocations that the total units in the plan period for each allocation should be clearly specified considered appropriate in the current form.
Phasing Tranche Refer to trajectory 2018- 2022: 0 2023-2027: 260 2028-2033: 587		
Land south of Bridgend (Island Farm), shown on the Proposals Map, is allocated for a comprehensive green infrastructure- led mixed-use development. The site will deliver circa 847 homes (including 20% / 169 affordable homes), incorporating a new one form entry primary school with co- located nursery, the re-location of Heronsbridge Special School, leisure facilities, recreation facilities, public open space, plus appropriate community facilities, employment and commercial uses.		
MASTERPLAN DEVELOPMENT PRINCIPLES This development should must accord with the following principles, which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting	Proposed changes being sort to Policy PLA2.	Comments noted, however, the Planning Inspectorate has advised that 'must' is a Strategic and Development Management Policies. Therefore, the proposed unsubstantiated and not supported. The Policy is considered appropriate in its curre ensure more certainty for all stakeholders during the Replacement LDP period.



s appropriate terminology for sed changes to PLA2 are urrent form and is designed to

<ul> <li>cohesive communities. A masterplan must be prepared and agreed with the Council prior to the sites development to demonstrate how these principles will be delivered in an appropriately phased manner:</li> <li>a) Create a well-connected, sustainable mixed-use urban extension to Bridgend, comprising a number of character areas that integrate positively with the existing landscape, SINC, adjacent Grade II* listed Merthyr Mawr House, existing housing clusters, community facilities, Active Travel Networks and public transport facilities;</li> <li>b) Pursue transit-orientated development that prioritises walking, cycling and public transport use, whilst reducing private motor vehicle dependency. Well designed, safe walking and cycling routes must be incorporated throughout the site to foster community orientated, healthy, walkable neighbourhoods;</li> <li>c) Create a multi-functional green infrastructure network within the site that facilitates active travel, enhances biodiversity, provides sustainable drainage and fosters healthy communities. There should must be particular emphasis on retaining existing trees and hedgerows within the public realm, incorporating appropriate landscaping, protecting biodiversity, providing habitats for local species and supporting a range of opportunities for formal and informal play in addition to community-led food growing;</li> <li>d) Pursue high quality, well-planned development in the vicinity of the overhead line route is used to make a significant, positive contribution to the development's green infrastructure network. This should must be achieved by creating a linear park that</li> </ul>	Proposed changes being sort to Policy PLA2. Proposed changes being sort to Policy PLA2.	Comments noted, however, the Planning Inspectorate has advised that 'must' is . Strategic and Development Management Policies. Therefore, the proposed unsubstantiated and not supported. The Policy is considered appropriate in its curr ensure more certainty for all stakeholders during the Replacement LDP period. Comments noted, however, the Planning Inspectorate has advised that 'must' is . Strategic and Development Management Policies. Therefore, the proposed unsubstantiated and not supported. The Policy is considered appropriate in its curre ensure more certainty for all stakeholders during the Replacement LDP period.
incorporates landscaping areas, nature conservation and pedestrian linkages to		

is appropriate terminology for sed changes to PLA2 are urrent form and is designed to

is appropriate terminology for sed changes to PLA2 are urrent form and is designed to

avoid the unnecessary sterilisation of land near the overhead lines;		
e) Extend the site's green infrastructure network to Newbridge Fields, capitalising on proposed active travel route INM-BR- 49 and establishing a 'green lung' that connects the site to both Bridgend Town Centre and Merthyr Mawr. This will facilitate a key multi-functional network of integrated spaces and features south of Bridgend, providing a plethora of economic, health and wellbeing benefits for new and existing residents;		
<ul> <li>f) Ensure the design and layout of the site has regard to the surrounding landscape, minimising visual impacts through the inclusion of mitigation measures that provide links with the existing landscape and access features. Appropriate landscaping treatments must be utilised along the southern fringes of the site in order to minimise visual impacts on adjacent uses;</li> <li>g) Orientate buildings to face open spaces and streets where appropriate to enhance cohesiveness, foster a strong sense of place and ensure community safety; and h) Provide a mix of higher densities at key points in the layout and lower densities on the rural/sensitive edges.</li> </ul>	Proposed changes being sort to Policy PLA2.	The Policy is considered appropriate in its current form and is designed to ensure m stakeholders during the Replacement LDP period.
<b>DEVELOPMENT REQUIREMENTS</b> The development should <del>must</del> provide the following requirements:	Proposed changes being sort to Policy PLA2.	Comments noted, however, the Planning Inspectorate has advised that 'must' is Strategic and Development Management Policies. Therefore, the proposed unsubstantiated and not supported. The Policy is considered appropriate in its curr ensure more certainty for all stakeholders during the Replacement LDP period.
1) Deliver circa 847 homes, incorporating an appropriate mix of dwelling sizes and types to meet local housing needs, including 20% affordable housing units to be integrated throughout the development in sustainable clusters of no more than ten units as per the Council's requirements;	Proposed changes being sort to Policy PLA2.	Comments noted, however, the Planning Inspectorate has advised that 'must' is Strategic and Development Management Policies. Therefore, the proposed unsubstantiated and not supported. The Policy is considered appropriate in its curre ensure more certainty for all stakeholders during the Replacement LDP period. The remove reference to clusters of ten affordable units is not supported. The rationale f clearly set out in the Affordable Housing Background Paper and is consistent with affordable housing through sustainable clusters of no more than ten affordable unit the respective developments, is considered fundamental to ensure delivery of

more certainty for all

is appropriate terminology for sed changes to PLA2 are urrent form and is designed to

is appropriate terminology for sed changes to PLA2 are urrent form and is designed to The representor's proposal to le for this policy requirement is with Policy COM3. Delivery of units, interspersed throughout y of balanced, mixed-tenure,

		sustainable communities. Discrete clusters of more than 10 affordable units can othe unconducive to the delivery and maintenance of balanced, mixed tenure communitie
2) 1 1.84 hectares of land to accommodate a minimum one form entry primary school and a proportional financial contribution to nursery and primary school provision as required by the Local Education Authority. The financial contribution (including timing and phasing thereof) must be secured through Section 106 Planning Obligations in accordance with the Education Facilities and Residential Development SPG. The school must be accessible to new and existing residents by all travel modes, enabled by the development;	Proposed changes being sort to Policy PLA2.	Comments noted. However, the intention is to secure future land provision to an expansion.
<ul> <li>3) 4 hectares of land for the relocation of Heronsbridge Special Education Needs School;</li> <li>4) Green Infrastructure and Outdoor Recreation Facilities to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance;</li> </ul>		
5) 4.3 hectares of land for leisure and ancillary commercial uses which could include a Community Indoor Tennis Centre;	Proposed changes being sort to Policy PLA2.	The proposed change would incorporate a degree of flexibility into Policy PLA2 and the submission version of the RLDP. Proposed change accepted.
6) Highway improvement to ensure the principal point of vehicular access is off the A48 in a manner that integrates the SINC and adjacent Hut 9 heritage facility;		
7) An emergency access through Bridgend Technology Park that also promotes pedestrian and cycling connectivity serves as the primary access for the relocated Heronsbridge SEN school and the Community Indoor Tennis Centre, as well as an emergency access for the residential element of the scheme;	Proposed changes being sort to Policy PLA2.	The proposed change adds clarity to the policy criteria and will be incorporated into the RLDP. Recommendation: Proposed change accepted.
8) Off-site highway improvements with regard to the requirements arising through	Proposed changes being	Para 5.109 National planning policy (PPW) states the provision of adequate and effic the plan is essential. It is essential that strategic site policies reference the IDP and

therwise become increasingly ities.

accommodate future school

nd will be incorporated into

o the submission version of

ficient infrastructure to deliver d Transport Priority Schedule

assessment of the proposals at planning application stage f <del>rom the Strategic Transport Assessment and as identified in the Transport Measures Priority Schedule; 19</del>	sort to Policy PLA2.	to ensure consistency with the Development Plans Manual that states 'LDPs sho proposals and allocations are expected to come forward, links to any required infras infrastructure improvements and clearly state who will be responsible to fund such in in the plan period to facilitate development'. Therefore, the Policy is considered app and is designed to ensure more certainty for all stakeholders during the Replacement
<ul> <li>9) On-site and off-site measures to provide good quality, attractive, legible, safe and accessible pedestrian and cycle linkages in accordance with Active Travel design. This could include improved linkages <del>must be provided</del> along the A48, with Brynteg Comprehensive School, Bridgend Industrial Estate and Bridgend Town Centre (including the bus station and train station). Green infrastructure linkages must also be provided with Newbridge Fields. Connections must therefore be made to existing active travel routes and new routes should be provided to accord with the proposed routes within the Council's Active Travel Network Maps: INM-POR-15, INM-BR-46, INMBR-48, INM-BR-75, INM-BR45 and INM-BR-49;</li> <li>10) Retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or SemiAncient Woodland), and SINCs;</li> <li>11) Submit and agree ecological management plans including proposals for mitigation, enhancement and maintenance for retained habitats and protected species (including for bats and</li> </ul>	Proposed changes being sort to Policy PLA2.	The Replacement LDP aims to reduce private car reliance and help the County Bord 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. Bridgend County Borough Council has produced Active Travel Network Maps to iden routes required to create fully integrated networks for walking and cycling to access and facilities. The Council's Active Travel Network Maps set out detailed plans for routes and facilities in the County Borough over the next 15 years. Further informatio Travel Network Maps which can be viewed on the Council's website. The Active Trimprove access to key services and facilities including town centres, employment site hubs, improved access to education facilities such as schools and colleges and improve of, the existing strategic cycle network in the County Borough. The routes and proposals shown on the Active Travel Network Maps are indicatin subject to change as routes are further developed. Opportunities should be maximis these routes, providing walking connections which will allow integration between new communities. Implementation of this policy will be facilitated through the development process. Whe proposals, the design layout will be considered and priority will be given to the propos and cycling. A high quality design which makes a positive contribution to the distinctiv places will be essential in ensuring walking and cycling is an attractive and popular or should therefore ensure the key principles of design are employed to deliver activ Active Travel Act Design Guidance and other relevant guidance can aid in the del practice.

should clearly indicate when astructure, identify necessary n improvements at what point appropriate in its current form ent LDP period.

orough achieve the principles nd expanding upon the current

lentify the walking and cycling ess work, education, services for a network of active travel tion is contained in the Active Travel Network Maps aim to ites, retail areas and transport provements to, and expansion

ative alignments that may be nised to further improve upon aw developments and existing

hen considering development osals that incorporate walking ctiveness of communities and ir option of travel. Developers tive travel. Adherence to the delivery of standards of good

sites in the County Borough. PLA12 should be considered lopment is contributing to the riate in its current form and is OP period.

425	dormouse) and provide appropriate compensatory and replacement habitat; 12) On and off-site measures including any appropriate upgrades to the clean water supply or public sewerage networks; 13) A new on-site heat network in accordance with ENT10 subject to feasibility. If the delivery of a district-heath network is not feasible the sequential approach to identify low carbon heating technologies should be adopted in accordance with ENT10 ; and 14) A new local 'hub' with a concentration of appropriate mixed uses and local services. The 'hub' should have active frontages around a pivotal, focal point of the development where it is easily accessible to new and existing residents through Active Travel, thereby limiting the need for private vehicular trips. Changes sought: revisions to PLA2 wording as above.	Proposed changes being sort to Policy PLA2 (Criteria 13).	Heat Networks are a method of delivering heating and hot water to multiple buildings and, particularly in urban areas, can be the most effective way to provide low carbo vary in size from a single block of flats, two buildings sharing a single heat source buildings forming a District Heat Network. Domestic heating is a major contributor to Bridgend County Borough's carbon emissis heat is critical to achieving a low carbon energy system and is a national and loc identifies Bridgend as a 'Priority Area for District Heat Networks' and requires pla opportunities for District Heat Networks and plan positively for their implementatior Energy Strategy and Renewable Energy Assessment identifies those areas cor development for district heat, hybrid and electric-heating solutions in combination wit fabric retrofit as shown in Figure 3 below. The Bridgend Renewable Energy Assessment identifies the most appropriate low the LDPs Strategic Sites (refer to PLA1-5). As part of the Council's holistic approad heat, ENT10 seeks to ensure that low carbon heating technologies are installed development (heat networks below this threshold will also be encouraged). This poli development is designed in such a way to not prejudice the future development of District Heating Network, and enable development to connect to it at a later date or The precise alignment of the Network will only be finalised following detailed ground i assessments. Developmers are encouraged to discuss the alignment with the CC accertain whether their proposals are likely to be affected. Proposed developments proposal will facilitate a connection to a District Heating Network, or robustly justify technically and/or economically viable and suggest an alternative approach. This rob on the basis of development longevity. Schemes should be able to demonstrate that zero carbon energy system, otherwise costly retrofits will be required in the future to are met. All polices are inter-related in their nature and need to be read in conjunction with c an understanding of t
720			

ngs from a central heat source rbon heat. Heat networks can rce or wider areas of multiple

ssions therefore decarbonising ocal challenge. Future Wales planning authorities to identify ion. The Bridgend Local Area considered to be suitable for with different levels of targeted

w carbon heating solution for bach to the decarbonisation of led as part of all new major olicy will also help ensure that at of a potentially Countywide once it becomes operational. Id investigations and feasibility Council at an early stage to ats must demonstrate how the tify why the connection is not obust policy position is justified hat they are suitable for a netto ensure that carbon targets

n one another in order to gain fore, the proposed change is roach that requires new major selected in the first instance, iate in its current form.

e-allocation (Parc Afon Ewenni dered deliverable components olled forward' into the Deposit rability and viability credentials t, there has been a substantial Replacement LDP period, as ound Paper, Spatial Strategy

a development plan must be deliverable". The Council have previously identified (within the LDP Review Report) that the site was not deliverable due to issues associated with land ownership and access rights. NRW's response to the Preferred Strategy also identified issues associated with flood risk (the site being partly within Flood Zone B and C2) protected species and land contamination. SP2 (1) Porthcawl Waterfront and	the plans housing requirement.	For Parc Afon Ewenni, the Council has now removed the site from the housing traje subsequent uncertainty relating to delivery timescales. The Candidate Site Assessm updated to reflect this constraint, of which states that 'the site is located within the Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). The allocation from the existing LDP (REG1(6)) and is proposed to be developed for of uses. However, the Council's Strategic Flood Consequences Assessment identifies vulnerable to flood risk. As such, the site will not therefore be allocated for develo LDP'. Therefore, the Council will not seek to allocate Parc Afon Ewenni due to the timescales as a result of flood risk.
COM1(1) Parc Afon Ewenni make up some 30% of the proposed allocations proposed to be delivered within the plan period. This represents a significant overreliance on two LDP rollover sites. Relying on the delivery of the site to deliver such a large component of the proposed housing requirement could render the LDP unsound in that it would not be effective and would not deliver.		For Porthcawl Waterfront, the Council has now purchased and has total control over F defence works are progressing on site and are due to be completed by the end of 20 currently being explored in order to bring forward development, initial work has procurement mechanisms and a formal procurement exercise is scheduled to co (Sandy Bay / Coney Beach) is being jointly promoted by the Council and a priva majority of the site is not reliant on coastal defence works to come forward. A land-ow a disposal strategy is being finalised and the site is likely to be brought to the marke Phase 2 now running in parallel, there is now no reason why both phases will be un forward together, as further evidenced by the extensive supporting deliverabilit representor's objection to Porthcawl Waterfront is considered unsubstantiated and is
		The total housing provision, and spatial distribution thereof, has also been subject analysis to enable development of the housing trajectory. The trajectory was prep- dialogue with the respective site-promoters, followed by effective collaboration and it stakeholders at a Stakeholder Group Meeting. As documented within the Housing Tra- there were no outstanding matters of disagreement on the completion figures or the in the plan period (including those sites with planning permission and new hou conclusion of the Stakeholder Group Meeting. In summary therefore, the represe Porthcawl Waterfront are not supported.
Land West of Bridgend A Strategic Site is proposed for allocation at Land West of Bridgend under Policy		Informed by the Sustainability Appraisal Report, the Candidate Site Assessment pu Deposit Plan confirms and provides reasoned justification for the outcome of the site s of each candidate site. In relation to Land west of Tondu Road (Candidate Site Re- Assessment states,
SP2(3). The allocated site formed part of a wider Sustainable Growth Area identified at the Preferred Strategy stage, which land west of Tondu Road (Candidate Site Ref: 286.C2) promoted by Taylor Wimpey	Objection: Land west of Tondu Road (Candidate Site Ref: 286.C2)	'The candidate site is located on the periphery of Bridgend, which is identified as a Se defined by SP1). Insufficient information has been submitted in order to conduct a and the site promoter has not provided a number of technical studies to demonstr Furthermore, the required level of growth can be accommodated on less sensitive and serve this area'.
Strategic Land formed part of. The Council's reasoning for the Candidate Site not progressing past the Stage 2 assessment is identified by the Council as being due to: "The candidate site is located on the periphery of Bridgend, which is	should be allocated for mixed-use residential development.	The Development Plans Manual advises that detailed evidence should be provided unaking process to inform the delivery of the preferred strategy and subsequent planevidence at the candidate site stage is essential. Where inadequate evidence is profurther evidence being sought later in the process, incurring time delays. An inadequate demonstrate delivery can be a reason for discounting sites.
identified as a Sustainable Growth Area (as defined by SP1). Insufficient		No comprehensive viability assessment was provided for Land west of Tondu F 286.C2). The Council wrote to all Stage 2 Candidate Site promoters on 21 <sup>st</sup> August 20

ajectory due to flood risk and sment (2022) report has been the settlement boundary of the site represents a 'Rollover' r commercial and residential es that the site is significantly elopment in the Replacement the uncertainty over delivery

r Phase 1 (Salt Lake), coastal 2022. Partnership options are as commenced in relation to commence shortly. Phase 2 vate owner and a significant owners agreement is in place, ket shortly. With Phase 1 and unable to progress and come ility evidence. As such, the I is not supported.

bject to site-specific phasing epared initially through close d involvement with a range of Trajectory Background Paper, he timing and phasing of sites ousing allocations) following esentor's concerns regarding

published to accompany the e selection process in respect Ref: 286.C2) specifically, the

Sustainable Growth Area (as a full assessment of the site strate the site is deliverable. /e alternative greenfield sites

d upfront and early in the plan an stages. A greater depth of provided upfront this leads to equate level of information to

Road (Candidate Site Ref: 2020 to remind site promoters

information has been submitted in order to conduct a full assessment of the site and the site promoter has not provided a number of technical studies to demonstrate the site is deliverable. Furthermore, the required level of growth can be accommodated on less sensitive alternative greenfield sites and serve this area." This reasoning is wholly disputed and responded to below:

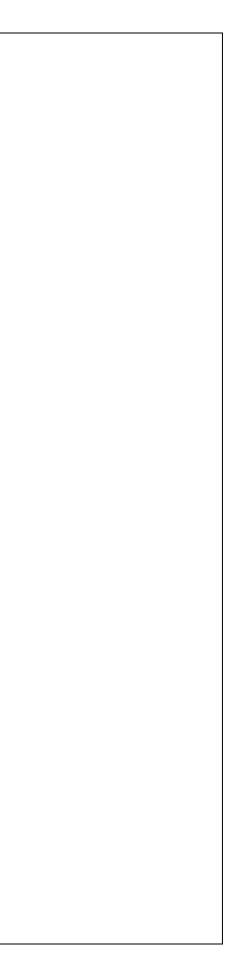
- We accept that the site is identified as being located within a Sustainable Growth Area. This lends support to the site's allocation;
- A number of technical assessments have supported the site's promotion thus far (covering topics such as ecology, landscape and visual, drainage, transport, viability and masterplanning). The proposals are inherently deliverable and are being advanced by Taylor Wimpey who have a successfully delivered new communities and neighbourhoods in Bridgend and the surrounding area. Recent developments include Parc Derwen and Gerddi Castell, Brackla in Bridgend; and
- It is not accepted that the required level of growth can be accommodated on less sensitive alternative greenfield sites. The site presents the most sustainable location for the organic growth of Bridgend - being located on the edge of the Town within proximity of train stations, facilities and services. As part of the proposals a school can be delivered directly adjacent to Ysgol Gyfun Bryntirion enabling complementary facilities to be provided and shared. The site's allocation would therefore wholly accord with the Site Search Sequence set out in PPW. Please refer to the enclosed Vectos Technical Note which the site demonstrates that

of the importance of conducting an initial site viability assessment and providing evidence to demonstrate the financial deliverability of their sites. Site promoters were also informed that any initial viability information they had gathered would assist them in this process. The same letter also explained that the South East Wales Region is collectively in agreement to use the Burrows-Hutchinson Ltd Development Viability Model (DVM) for site promoters to undertake site-specific viability appraisals and that the Council endorses use of the DVM as an appropriate tool for submitting viability assessments in support of LDP Candidate Site submissions. Instructions were provided on how to access this model should site promoters wish to use this option to undertake a site-specific viability assessment. A follow-up letter was sent to all Stage 2 Candidate Site promoters on 11<sup>th</sup> September to re-iterate that the deadline for submission of Site-Specific Viability Appraisals was Monday 19<sup>th</sup> October 2020 (up to 11.59pm). Despite these detailed instructions, no detailed viability appraisal (using the DVM or otherwise) was submitted to the Council to demonstrate that Land west of Tondu Road (Candidate Site Ref: 286.C2).

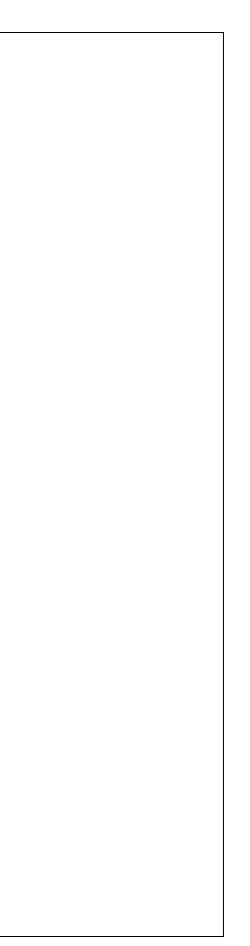
Furthermore, the site promoter failed to provide a full Transport Assessment of which is a key piece of technical evidence, failing to enable full comprehensive assessment of the site during site selection stage, specifically as part of Stage 2 of the Candidate Site Assessment.

Whilst the Council notes the representor's objection to this conclusion, the proposal is not supported for the reasons outlined.

represents the right location for		
development at Bridgend.		
It is accordingly considered that the		
Candidate Site is suitable for allocation		
within the RLDP and will contribute to the		
overall soundness of the Plan. The		
proposals advanced by Taylor Wimpey		
accord with the National Sustainable		
Placemaking Outcomes and Sustainable		
Transport Hierarchy set out in PPW and		
the site is considered to be deliverable and		
viable.		
<ul> <li>A significant number of homes with</li> </ul>		
a range of sizes and tenures to		
meet the demand for new housing		
in the area – providing consistency		
of supply on a site within a single		
landownership under positive		
control by Taylor Wimpey;		
<ul> <li>The delivery of affordable homes;</li> </ul>		
<ul> <li>A Local Centre with provision for</li> </ul>		
retail uses and other supporting		
neighbourhood facilities;		
<ul> <li>Development of educational and</li> </ul>		
supporting community facilities		
adjacent to Ysgol Gyfun Bryntirion;		
<ul> <li>New access points including onto</li> </ul>		
Tondu Road, a network of		
cycle/pedestrian routes and		
improved public transport provision		
to maintain the connectivity of the		
site;		
The accommodation of a bus route		
through the site;		
Providing access to Tondu Road		
would take pressure off Junction 36		
of the M4 (the southern arm is at		
capacity whilst Tondu Road		
provides a link to the northern		
approach) together with alleviating		
congestion in Bridgend Town		
Centre (at Park Street and the		
associated Air Quality Management		
Zone);		
<ul> <li>A strong, sensitive and high-quality group infrastructure network that</li> </ul>		
green infrastructure network that		
maintains and improves		
biodiversity in the area as well as	I	



<ul> <li>maintaining much of the existing painting, helpforws and trees; and</li> <li>The site forms part of a wider strategic area and is adjacent to a draft allocation (under Policy SP2 (3) Land West of Bridgend). The site complements this draft allocation as it provides the opportunity for a cohesive wider masterplan and to develop the critical mass needed to enhance local living and high levels of internal movement. Opportunities to ultise schemes proposed by this neighbouring site contained within the Draft Deposit Plan will be explored, such as creating a discrible link with Llangewydd Road as a new Green Lane for access into Bryntion. This is already connected to the site via a bridleway forming part of the Bridgend Circular Walk.</li> <li>Land west of Tondu Road (Candidate Site Ref. 286.C2) should accordingly be allocated within the LDP in order to comfluents to subtainable.</li> <li>In summary, important changes are required to the level of growth (which should be increased), the overall spatial strategy (which should direct a greater level of growth bridgend as the most subtainable sattomont) and the overalle and flevere. Lane west of Tondu Road Corollare Malk.</li> <li>In summary, important changes are required to the plan to onsure its soundness.</li> <li>In summary theorem the plan is apporphicate and effective. Land west of Tondu Road corollary and the overallange of LDP rollover allocations at Parc Alon Evenni and Portneaw Wathfront. These issues need to be addressed to ensure that the plan is apporphicate and effective. Land west of Tondu Road corol with the Site Search Sequence, the National Sustainable Tonsport Hierarchy set out in PPW. We would Strong Qutcomes and Sustainable Floremaking Qutcomes and S</li></ul>		
<ul> <li>planting, hedgerows and trees; and</li> <li>The site forms part of a wider strategic area and is adjacent to a draft allocation (under Pelicy SP2 (3) Land West of Bridgend). The site complements this draft allocation as it provides the opportunity for a cohesive wider masterplan and to develop the driftical mass needed to enhance local living and high levels of internal movement. Opportunities to utilise schemes proposed by this neighbouring site contained within the Draft Deposit Plan will be explored, such as creating a desirable link with Llangewydd Road as a new Green Lane for access into Brytilion. This is already connected to the site via bridgeway forming part of the Bridgend Circular Wak.</li> <li>Land west of Tondu Road (Candidate Site Ref: 226;C2) should accordingly be allocated within the LDP in order to contribute to its soundness.</li> <li>In summary, important changes are required to the plan to ansure its soundness. We object to the level of growth (which should be increased), the overall apstal strategy (which Should drifert a greater level of growth Bridgend Porticawi Waterfront. These issues need to be addressed to me bridgend suitable and deliverable settlement] and the most sustainable settlement] and the Bridgend Sustainable Settlement] and the Bridgend Sustainable Crowth Area. Its development would accord with the Site Search Sequence, the National Sustainable Phacemaking Outcomes and Sustainable Phacemaking Outcomes and Sustainable Phacemaking Outcomes and</li> </ul>	maintaining much of the existing	
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	to allocate the site to contribute to the		
391	overall soundness of the plan. Land at Castle Meadows, Coity (ref. 323.C1) A significant amount of work has been undertaken in support of the allocation of this site within the BRLDP. This work concluded that there were no significant barriers to development, subject to mitigation which could be managed through appropriate planning conditions or through S106 contributions The site is located on the southern edge of Coity off Castle Meadows. It is currently open fields with some agricultural buildings associated with Croesty Farm. Under the current adopted LDP, the site is designated as Green Wedge and partly within the Coity Conservation Area. It is notable, however, that the Deposit BRLDP removes the Green Wedge designation from the area around Coity. BCBC's Review of Green Wedges (2021) confirms that all existing green wedges under the current adopted LDP were drawn to prevent coalescence, protect the landscape setting and maintain the distinctiveness and integrity of the settlements and communities across the County Borough. The Review identifies that during the adopted plan period only one application for a householder development was submitted. Given that this proposed site at Castle Meadows has not been taken forward as an allocation within the BRLDP, the Authority have concluded that there is no development pressure in this particular location, and that the proposed policies relating to development in the Countryside (and other policies to manage development) the green wedge designation is unnecessary and is thereby not proposed to be taken forward. The proposed high quality residential development put forward as part of the candidate site submission provides an opportunity for an improvement of the quality of the southern urban edge of Coity. Development would be contained	y Parcau, Bridgend	Identification of appropriate proposed allocations has been undertaken in accord Sequence and other requirements set out in Planning Policy Wales, as documented the Plan. This includes the Candidate Site Assessment, Spatial Strategy Options B Trajectory Background Paper and Minimising the Loss of BMV Agricultural Lan rationale for the proposed allocations within the Deposit Plan is clearly outlin Assessment. For Castle Meadows, Coity, the Candidate Site Assessment concluded "The site is located on the edge of the existing settlement of Bridgend which is identifie Area (as defined by SP1). When compared to the other sites in the area that are can in the Plan, the site is less sustainable in that it is located further from facilities and centre with poor pedestrian connectivity. The site would lead to an increase in the car and therefore not encourage a modal shift to more sustainable forms of actin therefore be allocated for development in the Replacement LDP". Conversely, for Craig y Parcau, Bridgend, the Candidate Site Assessment concluded The candidate site is located on the periphery on Bridgend which is identified as a St defined by SP1). The site is well serviced by the Active Travel network which will help oriented development. The site is considered to be free of any significant constr allocated for residential development in the Replacement LDP. As such, the representor's proposals are not supported.

ordance with the Site Search ted in supporting evidence to Background Paper, Housing and Background Paper. The lined in the Candidate Site ded:

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<ul> <li>within a strong defensible edge, provided by the existing mature tree and hedgerow cover along boundaries of the site as well as West Plas Road to the south.</li> <li>In terms of heritage, the Historic Environment Assessment prepared by EDP confirms that the land within the site is assessed as making a negligible contribution to the character or appearance (in the east) and setting (the larger field in the west) of the Coity Conservation Area. Hence, whilst care should be afforded to the preparation of an appropriately sensitive materpian for future development of the site, the fact that it stradeliss the boundary of the designated area is not concluded to represent a significant constraint.</li> <li>According to the Candidate Site Assessment Report the site has no been included in the Deposit Draft LDP, and therefore is not proposed to be allocated for the following reason: "The site is located on the edge of the existing settlement of Bridgend which is identified as a Sustainable Growth Area (as defined by SP1). When compared to the other sites in the area that are carried forward as allocations in the Plan, the site is less sustainable in that it is located further from facilities and services to Bridgend town centre with poor pedestrian connectivity. The site would lead to an increase in the dependency on the private car and therefore not encourage a modal shift to more sustainable forms of active travel.</li> <li>The site will not therefore be allocated for development in the Deposit Plan." Based on the assessment lundertaken by Veotos, such a statement simply is not the case. It is noteworthy that comparison is drawn to other sites in the area that are carried forward as allocations in the Plan. Except for the strategic allocation, here are only two allocations in the Bridgend area identified or housing. One being COM1(1) Parc Ewenni and the other COM1(2) Craig Y Parcau. Whilst the Parc Ewenni site has been proposed for</li> </ul>		
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Ewenni site has been proposed for		
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residential development for a number of years, it is now our understanding that a number of the hurdles to development have been addressed and the site is now more likely to come forward. Concern is however, expressed at the proposed allocation of the land at Craig Y Parcau. Further discussion and formal objection to the proposed allocation of this site is provided below. Figure 2.2 of the Transport Assessment prepared by Vectos as part of the Candidate Site Stage 2 submission outlines the various facilities within proximity of the Coity site: This identifies the breadth of facilities available. What the figure does not show is that the McArthur Glen shopping Outlet includes a Sainsburys Supermarket and other leisure facilities like a cinema and restaurants. In addition, there are bus stops located at Church Acre identified to the south east of the site). In terms of additional context since previous submissions have been made in respect of this site, planning permission was granted on the 23rd September 2020 for a district centre on the Parc Derwen strategic site (ref. P/19/656/RES). The proposals include for 7 retail units spread over two blocks. The below aerial image shows the relationship between the district centre and the Llanmoor's site: To provide some context in terms of access to active travel routes to the facilities identified above, below is an extract from the Bridgend Active Travel Integrated Network Map: It is also noteworthy that in response to a request by BCBC, an additional technical note was prepared in support of the site relating to its ability to connect into existing and proposed active travel routes. A full copy of the report is provided in Appendix 1. This note confirmed that an active travel



link from the western boundary of the site to the existing segregated active travel route on West Plas Road to the south and west of the site could be provided. A form of crossing facility can be provided to facilitate pedestrian and cycle movements across West Plas Road. It also confirmed that it is anticipated that a pedestrian/cycle refuge facility (incorporated within the splitter island) on the northern arm of the West Plas Road roundabout can be provided and would be in keeping with the existing facilities around the roundabout. Alternative crossing facilities could be explored subject to further highway and land ownership investigation.

Such improvements would provide direct access to the active travel route which connects to Bridgend Town Centre, the Hospital, Brackla Industrial Estate, Wildmill train station, Sainsbury's supermarket, Parc Derwen district centre and other services and facilities. The below extract from this note identifies how the connection to Heol West Plas could be achieved:

In terms of existing active travel links, the local area offers an excellent framework for non-motorised modes of travel and is served by good quality pedestrian and cycling routes, all of which are accessible from the site as described above.

Within the immediate vicinity of the site, footways are provided along Castle Meadows, which in turn lead to footways along West Plas Road to the north of the site. The footways along West Plas Road connect with a shared footway / cycleway provided further west along the carriageway. This allows for direct and convenient connectivity to a number of day to day facilities situated within the immediate surrounding area such as employment, education, leisure and retail facilities within Brackla Industrial Estate. Similarly, local facilities and the wider active travel network is accessible via the



recently built Parc Derwen Residential Development to the northwest of the site.

The recently published Active Travel Act Guidance (2021) refers to everyday journeys or as they are now referred to as utility journeys. These are trips with a purpose rather than purely for leisure. The extract overleaf, taken from the guidance documents is helpful when considering the site at Coity and importantly that walking up to 2 miles is considered reasonable for many users.

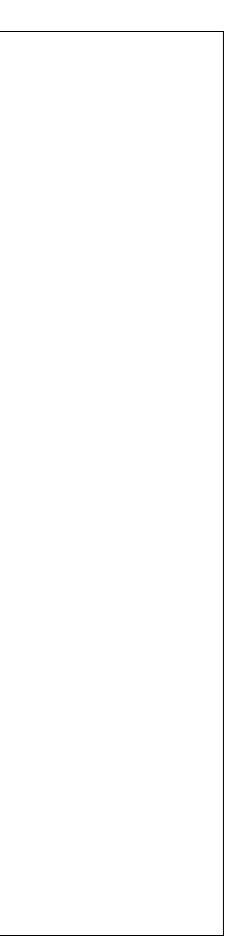
Furthermore, the shared footway / cycleway provided within Parc Derwen connects with a footbridge over the A4061, thus creating a traffic free pedestrian and cycle friendly route to local facilities within neighbouring areas to the northwest and southwest of Coity. This route connects with footways further west along West Plas Road which in turn connects with footways on Litchard Cross and Litchard Hill, thus creating ample opportunity for pedestrians to access further facilities and services in the area, not least including, McArthur Glen, Sainsburys Superstore and the Princess of Wales Hospital.

A traffic free cycle route is also provided along Rotary International Way, accessible via West Plas Road. As indicated on the Bridgend Integrated Network Map (previous page), this is part of BCBC's proposed improvements in the area and is yet to be fully completed. In its current condition the route provides connectivity from West Plas Road southbound to Rotary International Way / Princess of Wales Hospital roundabout.

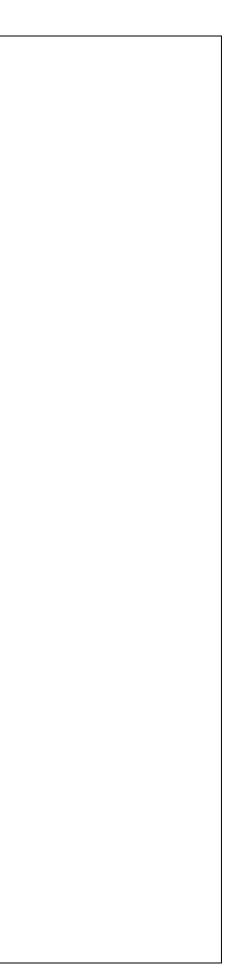
The shared footway / cycleway along West Plas Road can also be used to travel eastbound, albeit for a shorter duration. This facility provides a traffic free route for cyclists prior to having to re-join onto the carriageway. After continuing southbound along Simonston Road, cyclists can re-join the cycle network at Coychurch



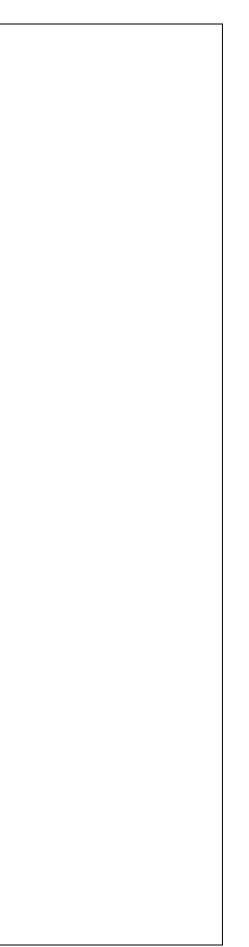
	roundabout, where extensive work by		
	BCBC has provided a segregated route to Pencoed via the A473.		
1   	It is noteworthy to mention that additional funding from Welsh Government has also been secured by BCBC in order to improve the route from Coychurch roundabout towards Bridgend town centre. It should be noted that in addition to the footways and shared footway/cycleways, a number of pedestrian leisure routes are also present within the vicinity of the site. These take the form of Public Rights of Way (PRoW) routes.		
1 5 1 1 1 1	One of which is a footpath that is provided from West Plas Road to the north of the site. This footpath is accessible directly from West Plas Road to the immediate north of the site via an existing property and provides an alternative off-road leisure route connection to the recently developed Parc Derwen residential development to the northwest of the site.		
	This additional information demonstrates that the site is well located to take advantage of the excellent existing active travel network, with safe, convenient and attractive routes available for pedestrians and cyclists to travel to local facilities within the immediate and surrounding area in accordance with the latest Welsh Government Advice Note on Active Travel. As such, whilst Bridgend town centre is accessible on foot, there are a vast range of local community and day to day facilities that benefit from active travel routes being available (or to be made available) that confirm this is an appropriate site for development and supports the need for utility journeys on foot or bicycle in order to place less reliance on private car journeys. The preferred strategy outlines four Strategic Objectives for the plan period		
	<ul> <li>which are set out below:</li> <li>SOBJ1: To Create High Quality Sustainable Places (Placemaking)</li> </ul>		



<ul> <li>SOBJ2: To Create Active, Healthy, Cohesive and Social Communities</li> <li>SOBJ3: To Create Productive and Enterprising Places</li> <li>SOBJ4: To Protect and Enhance Distinctive and Natural Places</li> </ul>		
We feel that the proposed housing development on the Site is not in conflict with any of these objectives. The suite of technical reports prepared for this candidate site have confirmed that the site can be successfully developed without material harm and would be a positive addition to the village. The supply of housing will create a high quality sustainable place, provide additional housing to Coity, is within proximity to a large area of employment land and utilises a currently under-used site surrounded by built form.		
Accordingly, we would conclude that the proposed development site should be allocated for housing within the Replacement Bridgend Local Development Plan in that it would make a valuable and positive contribution towards housing delivery in the area; providing a range and choice of homes for the residents of Coity and the wider communities.		
Objection to Allocation COM1(2) – Craig Y Parcau As highlighted above, the two key reason for not including the land at Croesty Farm, Coity as an allocation within the Plan is that the site does not benefit from the same level of connectivity as other allocated sites and it does not have the same level of facilities. This is simply not the case. Accordingly, we object to the allocation of site COM1(2) – Craig Y Parcau for a number of reasons; including: • Accessibility/Connectivity; • Relationship with existing built form;		
Placemaking;		



Biodiversity / Arboriculture	
The site falls to the south of the A48 and is somewhat 'out on a limb'. It introduces a new land use to the area. The Broadlands estate to the north is clearly bound to the	
south by the A48 and prior to this proposed allocation there has been no housing development proposed to the south of the road. The below extract from the BRLDP Proposals Map identifies the context in	
which the site lies:	
The above identifies the proposed strategic site PLA2 – Land South of Bridgend / Island Farm which is acknowledged as being south of the A48 but is well related to the existing settlement and adjoins existing built form which	
extends to the south of the road. This site, Craig Y Parcau, separate from this area by a 'green lung' which runs south west to north east through the settlement into the Centre and includes	
Newbridge Fields and other green spaces – demonstrated on the below aerial image:	
A residential development located to the west of this 'green lung' and south of the A48 would be a significant breach of some very defensible boundaries to the wider Bridgend settlement and result in significant future pressure to develop land	
further west and south. It is argued that the justification for which has not been fully considered and assessed, particularly given there are other sites which could	
cumulatively deliver the same level of housing without having such a potentially significant impact. Furthermore, the allocation of this site	
(COM 1(2)), which is by far a 'greener' and more constrained site when compared to the Land at Castle Meadows, would be	
likely to conflict with policies set out in National policies. The site would appear to be split into two parcels, separated by a mature area of	
planting and trees. It is also enclosed by existing mature trees and hedgerows. Any	



development of the site would therefore need to remove a significant proportion of these features to accommodate the 110 homes proposed on the site – particularly the central belt identified in the larger scale aerial image below:

Matters such as climate change and are all significant biodiversity considerations in the development of sites currently. Given the removal of such a significant level of mature landscape to deliver a scheme on this site and the need to provide biodiversity net-gain, it is questionable whether this site could accommodate the numbers proposed or could viably deliver on such requirements. We feel that this sites allocation is in conflict with the thrust of Future Wales and PPW in relation to biodiversity and climate change, biodiversity and placemaking.

As highlighted previously, the key reason this site was included over and above Llanmoor's land at Castle Meadows, Coity relates to its better active travel connectivity to Bridgend Town Centre. An extract from the Council's Active Travel Integrated Network Maps4 is provided below:

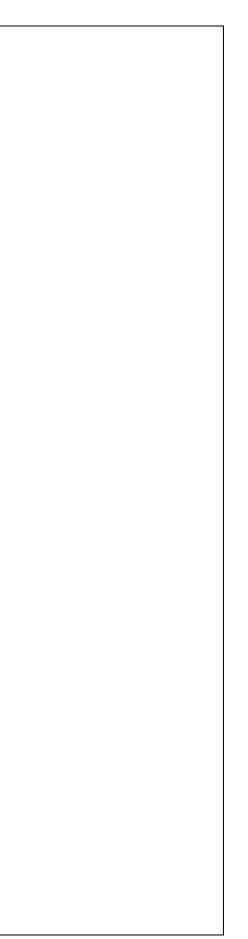
The above extract identifies that the site has reasonable access to the active travel network; a similar position to that identified at Castle Meadows.

Notwithstanding this, there are no bus stops near the site and therefore access to public transport is poor. The nearest bus stop is located on Bryntirion Hill – some 16-minute walk or 5-minute cycle. This is compared to a 11-minute walk or3-minute cycle to the nearest bus stop from the Coity site.

The nearest train station is located in Bridgend itself – some 32-minute walk or an 11-minute cycle. Accordingly, there is no difference in this respect. This is compared to a 22-minute walk or 7-minute cycle between the Coity site and Wildmill train station, or 37-minute walk or 9-minute cycle to Bridgend Train Station.



Accordingly, in terms of access to active		
travel and public transport both sites are		
comparable with Coity providing overall		
better access.		
In terms of access to services and		
facilities, again both sites are comparable		
in terms of the distance and range of		
services accessible, particularly when		
taking into account the recent approval of		
the district centre at Parc Derwen,		
Within the Broadlands local centre the		
following services and facilities are		
available:		
• Tesco Express		
• • Pub		
• Chemist		
• Nursery		
<ul> <li>• Takeaways</li> </ul>		
• • Café		
• Restaurant		
Such a range of uses is common place		
within local and district centres associated		
with larger housing allocations such as		
Broadlands and Parc Derwen.		
Accordingly, a similar range of uses would		
likely be established at the Parc Derwen		
district centre as and when it is		
constructed and occupied; thereby		
providing a similar level of services and facilities to that available here.		
In addition, it is argued that the Coity site		
provides better access to a large		
supermarket, shopping facilities (McArthur		
Glenn retail outlet), post office, and leisure		
facilities (including restaurants and		
cinema). In addition, Coity's proximity to		
healthcare (Bridgend Hospital) and		
employment (Brackla Industrial Estate),		
means that from a placemaking		
perspective the site performs far better		
than Craig Y Parcau.		
In light of the above, it is simply incorrect		
therefore to suggest that this site's		
connectivity from an active travel, access		
to public transport, or access to services		
and facilities is better than that of Land at		
Caste Meadows, Coity. We would contend		



that Coity's position exceeds Criag Y Parcau from a placemaking perspective. We raise some serious concerns in respect of the suitability of this site as an appropriate housing allocation within the BRLDP given its lack of existing connectivity, its position in the context of the wider settlement, and the potential impacts from a biodiversity perspective. If this site (COM 1(2)) is deemed suitable for allocation within the emerging local development plan, given what has been outlined above, the inclusion of our client's Site at Castle Meadows should be reconsidered. The active travel point raised was one reason for its exclusion, this site demonstrates a less policy compliant site with a greater number of physical constraints which has been deemed acceptable to be allocated for housing.

## Conclusion

In conclusion whilst the overall approach to housing delivery within the Deposit Bridgend Replacement Local Development Plan has some merit, there are grave concerns in respect of the ability to deliver on the housing numbers within the early years of the Plan; particularly given the delays that are inevitably going to occur for the larger strategic sites along with the unknowns and fluctuations in the delivery of windfall sites.

Accordingly, such concerns would indicate that the plan is un-sound under Test 3 – Delivery, in that there are question marks over the timing of the delivery along with the lack of appropriate contingency to deal with the likely slippage in delivery of larger Strategic sites. We therefore raise serious concerns to the currently proposed policies dealing with the housing strategy -Policy SP1 - Regeneration and Sustainable Growth Strategy and SP6 – Sustainable Housing Strategy. An appropriate approach, as was initially indicated within the Preferred Strategy, would be allocate a greater number of

smaller or medium sized sites that would be capable of being delivered early in the



plan, whilst the larger sites are being	
progressed through the planning system.	
Sites such as Llanmoor's at Castle	
Meadows in Coity would provide an 'oven	
ready' site with no apparent material	
planning consideration that would delay	
the approval of a planning application. The	
site would therefore be able to deliver	
circa.50 homes early in the Plan. We have	
shown within this submission that the	
reasons for not including the site within the	
plan, i.e. that there are sites with better	
connections to services and facilities and	
active travel connections than ours is	
clearly incorrect. At worst they are	
comparable, but we have shown that the	
Coity site is better placed from a	
placemaking perspective. Accordingly we	
would strongly object to the inclusion of the	
site at Craig Y Parcau (COM1(2)) within	
the Replacement Local Development	
Plan.	

Title	: Do you have any comments to make on the D	Deposit Replacement	LDP?
ID	Comment	Summary of	Council response
		changes being	
		sought/proposed	
82	BDW consider that improvements could be	Proposal for	The Strategy seeks to deliver several large-scale Sustainable Urban Extensions, w
	made to the Deposit RLDP by including a	several non-	sustainable communities that will incorporate a mix of complementary uses and delive
	number of additional non-strategic edge of	strategic edge of	infrastructure and/or provide new supporting infrastructure. Indeed, this latter factor
	settlement housing allocations to ensure	settlement	the school capacity issues across the County Borough and the need for new stra
	that growth can be delivered on smaller	housing	enough in scale to support provision of a new primary school as a minimum. Sustair
	sites, for local communities, early in the plan	allocations	have been proposed for allocation where they can best support the Replacement
	process, and reduce the reliance on larger		and are capable of delivering mixed use development at a scale that will enhance co
	sites. Concerns are held over the		
	deliverability of many of the Sites that are		Identification of appropriate Sustainable Urban Extensions has been undertaken in
	proposed to be allocated in the Deposit		Search Sequence and other requirements set out in Planning Policy Wales, as
	RLDP, due to a variety of issues including		evidence to the Plan. This includes the Candidate Site Assessment, Spatial Strategy
	land ownership, topography, ecological		Housing Trajectory Background Paper and Minimising the Loss of BMV Agricultura
	impacts and viability. As such, a greater		The rationale for the proposed allocations within the Deposit Plan is clearly out
	reliance should be placed on small to		Assessment. Without exception, all proposed sites are supported by a large bod
	medium sized greenfield releases which is		evidence to demonstrate their deliverability.
	considered to be a less risky strategy. A		
	heavily reliance is placed on placemaking		In terms of the proposal to place a greater reliance on small to medium sized gree
	which is generally supported but greater		this scale are far more likely to have an adverse impact on local communities by exa
	recognition needs to be highlighted in terms		problems and it is more difficult for such sites to provide their own supporting infi
	of ensuing that such demands do not render		sufficient critical mass. As noted in the Plan-Wide Viability Appraisal, sites of seve

which is necessary to create eliver improvements to existing or is particularly notable given trategic sites to be significant ainable Urban Extension sites nt LDP Vision and Objectives communities.

n in accordance with the Site as documented in supporting gy Options Background Paper, tural Land Background Paper. butlined in the Candidate Site body of technical and viability

eenfield sites, several sites of exacerbating local infratructure infrastructure until they reach everal hundred units can pose

	development unviable. Delivering no development will certainly not meet placemaking objectives.		their own viability issues for this very reason. Therefore, the Deposit Plan has only where capacity was clearly demonstrated to accommodate the respective level of g and/or necessary facilities and infrastructure improvements could be provided in sup
	Policy PA11 Parking Standards is not considered to be consistent with PPW 11 and the associated transport hierarchy given that we are aware that the Highway Department of the LPA tend to seek maximise provision of car parking in accordance with adopted standards which	Challenge PLA11 for not being in accordance with the transport hierarchy	PLA11 is a Development Management Policy that supports delivery of SP5: 3 Accessibility. The first criterion within proposed SP5 is for development to accord with hierarchy for planning, which is consistent with Planning Policy Wales. PLA 11's s further recognises that "the availability of parking spaces and parking charges applied a reduction in journeys by private car and encouraging a change in mode choice means of travel". Further local guidance will be provided in a revised future Parking
	can lead to developments dominated by car parking. Policy COM 10: Provision of Outdoor Recreation Facilities is not supported on the basis that it requires 3.35 hectares of open space per 1,000 but the Field in Trust requirement only requires 2.4 hectares of open space per 1000 population. This level of provision is considered to be excessive and should be reduced to comply with FIT standards. It is also noted that allotment provision of 0.2 hectares per 1,000 population is required on top of this requirement.	Reduce Outdoor Sport and Recreation Facilities Requirements (COM10)	All new housing developments will be expected to include an appropriate level of or amenity purposes in the interest of Good Design. This is an integral means of deliver Objectives, including to reduce social and economic equalities and ensure he environment. Contrary to the representor's conclusion, COM10 is based on Fie benchmark guidelines and allotment standards endorsed by the National Society Gardeners. The standards detailed within COM10 are not intended to represent developments and the nature of contribution will be assessed on individual merits. As "provision of a satisfactory standard of outdoor recreation space is required on all m and "the nature and type of provision will be informed by the findings of the latest O Playspace Audit and Allotment Audit". On-site provision must comply with the access set out in the Outdoor Recreation Facilities and New Housing Development SPG reduce the benchmark guidelines, below those recommended by Fields in Trust, is n
136 6	Policy SP6: Sustainable Housing Strategy Llanmoor support the Sustainable Housing Strategy set out in Policy SP6, in particular the provision for 9,207 homes. The housing requirement of 7,575 homes should be a minimum requirement as set out previously. Llanmoor also agree development should be distributed in accordance with the regeneration and sustainable growth strategy provided in Policy SP1 to ensure an appropriate and sustainable supply of housing.	To set a minimum housing requirement of 7,575 homes	The rationale for the Growth Strategy is detailed within the Strategic Growth Options support for the Growth Strategy is noted. An appropriate flexibility allowance (10%) h Deposit Plan and the basis for which is clearly set out in the Housing Trajectory Bac flexibility allowance, the Anticipated Annual Build Rate (AABR) will remain deliverable even if a significant unforeseen scenario, such as non-delivery of a strategic site, total level of housing provision within the Deposit Plan is set appropriately to ens requirement. 7,575 homes is indeed the housing requirement.
	Policy COM1: Housing Allocations Llanmoor support the inclusion of Land West of Bridgend being identified as a strategic site within the emerging housing allocations reflecting Bridgend's role as a Primary Key Settlement within the Settlement Hierarchy and Spatial Strategy.	None – support Land West of Bridgend as a Strategic Allocation	Comments noted.

only proposed site allocations f growth within the settlement support of the development.

: Sustainable Transport and with the sustainable transport supporting paragraph 5.2.76 ied, are key tools in facilitating ice towards more sustainable ng Standards SPG.

f outdoor recreation for public vering several Local Wellbeing healthy choice in a healthy fields in Trust recommended ety of Allotment and Leisure ent minimum provision on all As stated within COM10 itself, I new housing developments" Outdoor Sport and Children's essibility benchmark standards PG. As such, the proposal to is not supported.

ns Background Paper and the ) has been embedded into the ackground Paper. With a 10% ble throughout the plan period e, should occur. As such, the nsure delivery of the housing

	It further reflects the Sustainable Housing Strategy in Policy SP6.		
	Policy COM3: On-site Affordable Housing Llanmoor support the target affordable housing percentage of 15% for Bridgend Housing Market Area, whilst also supporting the 20% affordable housing contribution identified for Land West of Bridgend which have been identified having regard to the Local Housing Market Assessment, the Plan Wide Viability Assessment and site specific viability testing.	None – support area-wide and site-specific affordable housing policies.	Comments noted.
	<b>Summary</b> Llanmoor is wholly supportive of the allocation of land West of Bridgend as a sustainable urban extension within the DCD and is committed to delivering homes to meet Bridgend's needs. Whilst concerns remain over the viability and deliverability of other allocations, Llanmoor is supportive of the Replacement LDP, and are keen to ensure that the future plan is robust and sound for the next plan period.	None further to the above.	Comments noted.
717	I didn't receive any notification of this formally, only found out via a leaflet through the door from Merthyr Mawr council. The displayed planning signs around island farm only mentioned tennis courts!	Lack of awareness regarding consultation	<ul> <li>As part of Stage 4 of the Delivery Agreement, the Council was required to undertake I for a statutory period of 6 weeks, however the Council made an allowance for 8 we public participation. This was to ensure a range of views could be considered as part wide consensus on the Replacement LDP's strategy and policies. A number of consu to ensure efficient and effective consultation and participation, in accordance with included:</li> <li>A Legal Notice was placed within the Glamorgan Gazette on 3rd June 2021</li> <li>The package of consultation documents were been made available online via Council's Website (www.bridgend.gov.uk/ldpconsultation). Respondents we electronic survey online to make a formal representation.</li> <li>Printed reference copies were placed within public facing Council buildings, in County Borough (fixed and mobile), subject to social distancing guidelines. T also available to view at the Council's Civic Offices in Angel Street, Bridgend only as the offices had not re-opened to the public due to the pandemic. Hard were also been made available at these locations for members of the public to Dissemination of hard copies of information to individuals. Members of the public to prove the council's Plan to cover printing and postage costs for such a large</li> <li>Every individual and organisation on the LDP Consultation Database was (depending on their preference) to inform them of the availability of t Approximately 500 representors were contacted, provided with details of how</li> </ul>

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

e via Bridgend County Borough ts were able to complete an

gs, including every library in the nes. The reference copies were lgend, although by appointment Hard copies of the survey form blic to complete by hand. the public were able request a as a £25 charge for a hard copy large document

large document. was notified by letter or email of the Deposit Consultation. f how to access the package of

It shouldn't go ahead unless public services are addressed ahead of any housing developments	Concerns regarding infrastructure	<ul> <li>consultation documents and how to respond. As the consultation progress were been informed of and added to the database upon request.</li> <li>Planning Aid Wales were commissioned by the Council to run remote engage and Community Councils in Bridgend County Borough.</li> <li>A comprehensive social media plan was devised. A series of social method periodically on Facebook, LinkedIn and Twitter. They drew attention to different the County Borough throughout the consultation period.</li> <li>Planning Officers have presented the consultation remotely to established we Bridgend Community Cohesion and Equalities Forum and Youth Forum.</li> <li>In place of face to face public drop in sessions, representors were able to appointments with planning officers to discuss any queries/concerns they may to do this by emailing ldp@bridgend.gov.uk or telephoning 01656 643633.</li> <li>Posters were been sent to all Town and Community Councils to display</li> <li>Comments noted. An Infrastructure Delivery Plan (IDP) has been produced (See App a single schedule of all necessary infrastructure without which the development anticipated quantum of proposed housing/employment uses within the plan period</li> </ul>
		infrastructure includes transport, education, health, environmental managemen
Porthcawl residents should be consulted before agreeing to selling land to supermarkets like ALDI. We know the town the best, what it needs as a tourist destination and what we need as locals. Don't ignore us. BCBC already seem corrupt and we all wonder what we're	Concerns regarding proposed foodstore in Porthcawl	<ul> <li>community and cultural infrastructure.</li> <li>Comments noted. In terms of the proposed foodstore, evidence confirms (See Apperture contre fulfils its function as a town centre and performs well against most indicated However, the centre has a limited convenience offer which is significantly below the centre contains a range of smaller food stores suitable for top-up shopping, there is suitable for main food shopping. This provides limited consumer choice and mean travel to other centres to meet their needs.</li> </ul>
condpt and we all wonder what were paying our council tax for! With our volunteer beach cleaners out everyday, where are BCBC in clearing up after a bank holiday weekend?? It's all being left to locals to take care of!! The mess behind putting a supermarket/housing on the seafront will again mean the locals will be suffering with cars parked outside houses and traffic with smog lingering looking for spaces etc.		Marketing for a new foodstore was carried out in autumn 2020 whereby numeror received and appraised. A robust selection process in which each bid was carefully a development brief resulted in Aldi Stores Ltd being identified as the preferred bidder. brief required bidders to submit high-quality, bespoke designs for premises that coul as well as incorporating appropriate access and active travel arrangements. The development does not prescribe a particular architectural approach, but it does require development designed for human interaction and enjoyment whilst responding to an setting, cultural and heritage of Porthcawl. Cabinet members approved the disposal agreement.
		The food store site forms a key element of the wider masterplan that has been we Waterfront Regeneration Scheme and is intended to act as a precursor to, and can development across the wider site. Subject to a planning application, the foodstore we all-new residential, leisure, retail development at Salt Lake as well as new areas terminus, active travel facilities and more.
		In terms of car parking, it's acknowledged that a sound and robust parking strategy we of the regeneration. As part of the strategy, the site will accommodate a new multi store Hillsboro car par enabling more ground floor space to be given over to public Consideration should be given to alternative future uses as, overtime, the aspiration Waterfront will be principally by public transport including park and ride schemes, go of private vehicles requiring parking facilities. Consultations confirmed widespread simulti storey car park whilst recognising it will change the immediate outlook of properties.
	developments Porthcawl residents should be consulted before agreeing to selling land to supermarkets like ALDI. We know the town the best, what it needs as a tourist destination and what we need as locals. Don't ignore us. BCBC already seem corrupt and we all wonder what we're paying our council tax for! With our volunteer beach cleaners out everyday, where are BCBC in clearing up after a bank holiday weekend?? It's all being left to locals to take care of!! The mess behind putting a supermarket/housing on the seafront will again mean the locals will be suffering with cars parked outside houses and traffic with smog lingering looking for	are addressed ahead of any housing developmentsregarding infrastructurePorthcawl residents should be consulted before agreeing to selling land to supermarkets like ALDI. We know the town the best, what it needs as a tourist destination and what we need as locals. Don't ignore us. BCBC already seem corrupt and we all wonder what we're paying our council tax for! With our volunteer beach cleaners out everyday, where are BCBC in clearing up after a bank holiday weekend?? It's all being left to locals to take care of!! The mess behind putting a supermarket/housing on the seafront will again mean the locals will be suffering with cars parked outside houses and traffic with smog lingering looking forregarding infrastructure

ssed, additional representors

gagement events for all Town

media posts were released erent thematic areas / parts of

working groups, including the

b book one to one telephone hay have had. They were able

opendix 37). The IDP provides ent of allocated sites for the riod could not proceed. Such ent, utilities in additional to

pendix 16 – Retail Study) that icators of vitality and viability. the UK average. Although the is only one large supermarket ans that most residents must

erous bids (five in total) were y assessed against a planning er. The planning development ould act as 'gateway buildings' development brief for the food uire clear attention to "placeling area. This will enable a and celebrating the maritime al of the site to Aldi Stores Ltd, t.

worked up for the Porthcawl catalyst for, future phases of will be constructed alongside as of green open space, bus

y will be critical to the success storey car park on the existing plic realm and development. ion is that travel to Porthcawl , greatly reducing the number d support for the concept of a perties on Hillsboro Place.

			The authority has a strong desire to facilitate and actively encourage a modal shift 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 Po as a boulevard where visitors and locals could arrive at, and depart from the regene The location of the bus terminus will enable access towards the waterfront and also the has also undertaken feasibility work to explore proposals to deliver a bus term regeneration area. The bus terminus project is being brought forward in connection Metro Plus project and is seen as a key element of the wider regeneration plans.
516	Can you send me the proposed plan in all its details so I can examine it in greater detail?	Send me the proposed plan in all its details so I can examine it in greater detail	Members of the public were able to request a copy of the survey by post to complete There was a £25 charge for a hard copy of the Deposit Plan to cover printing a reference copies were placed within Council buildings, including every library in the mobile), subject to social distancing guidelines. The reference copies were also availand Civic Offices in Angel St, Bridgend, though by appointment only as the offices had Hard copies of the survey form were also made available at these locations for membry by hand. The plan itself including all background papers and technical evidence of https://democratic.bridgend.gov.uk/ieListDocuments.aspx?Cld=164&Mld=4059&Ver
707	I cannot agree that if homes are built then jobs will come to where the homes are, if it were that easy why wasn't all this done decades ago and unemployment reduced. Businesses are very cautious about where they locate and I cannot see them allowing themselves to be 'directed' to where they set up. Many famous top paying employers have chosen to up sticks and leave this area and all the carrots in the world would not change the situation. Very careful thought must be applied before committing to building projects and supporting facilities before carrying out far reaching investigation. Even the Welsh National gov't have found themselves caught out many times - particularly over the Newport road schemes which have cost millions in consultations and produced nothing. Even Swansea city council have spent vast sums of money digging up and re-laying roads to try and improve traffic flow, introducing 'bendy' buses etc, all for nothing. I'm reliably informed that driving through Swansea is still a hazardous experience - no better than it ever was, pedestrianisation, conflicting bus lanes, changing road routes and markings - all money for no gain. I'd agree that it's not easy by any means to create a perfect scenario, but it's already been proved that jumping in feet first without	Concerns regarding employment	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 appropriat 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: Preferre 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 infor response for the Replacement LDP. As such the Replacement LDP identifies an at to enable a balanced level of housing and employment provision that will achieve sus Over 30% of the County Borough's population is projected to be aged 60+ by 2033 growth across this age group, there is likely to be a broad reduction in local econor does not facilitate sustainable levels of economic growth to offset this phenoment therefore seeks to deliver sustainable forms of growth that will attract and retain ecor within the County Borough. As justified within the Strategic Growth Options Backgrou and Sustainable Growth Strategy is largely driven by households within the 35-44 projected to support an increase in people in workplace based employment ov accommodated through provision of up to 7,500 additional jobs. A positive employment land response is necessary to achieve an equilibrium betwe skilled labour force and job opportunities in order to stimulate the local to regional ecc Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix labour force boost alongside other employment trends including past take up of en based economic forecasts. The resulting evidence base has informed the scale and need and the land best suited to meet th

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

lete by hand (free of charge). and postage costs. Printed he County Borough (fixed and ailable to view at the Council's d not re-opened to the public. hbers of the public to complete

can be found online at: /er=4&LLL=0

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 formed the most appropriate appropriate plan requirement sustainable patterns of growth.

33. With absolute and relative nomic activity rates if the Plan enon. The Replacement LDP conomically active households ound Paper, the Regeneration 44 age group. This growth is over the Plan period, to be

tween new homes, a growing economy. The 2019 Economic ix 15) analysed this projected employment land and sector nd distribution of employment text of Planning Policy Wales oper, and set out in SP11.

	careful thought that considers all views can lead to costly mistakes.		Whilst it is beyond the scope of the LDP to guarantee that employers will take up such SP11 by allocating new employment land for development. Policy ENT2 supports employment function of existing business and employment sites. This will enable a come forward.
847	No	No changes proposed.	Comments noted.
996	Plans should include additional facilities for tourists. Visit neighbouring coastal resorts to see what is being offered. Porthcawl is a tourist town and needs to be able to compete. Making a park and ride facility while removing existing car parking, will not help the tourist and hospitality industries in Porthcawl.	proposed. Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront / tourist facilities / parking	Comments noted. With regards to leisure, an area north of the harbour within Salt L a leisure use, potentially a hotel. In the event that a hotel facility is not delivered the alternative form of leisure/tourism/commercial, year round, wet-weather att comprehensive enhancement of the Eastern Promenade with new buildings, facilit provides an exciting opportunity to create an area that will not only enhance the fronta to set a quality benchmark which will also need to be achieved elsewhere. Mixed-use development will be encouraged throughout the development. Commerce on the ground floor if there is market demand for such uses. Retail uses, restaurates a encouraged. This mix of uses will help bring life and vitality during the day and into the Sandy Bay will accommodate public open space, residential, education provision a open space, Policy PLA1 requires development of Porthcawl Waterfront to incorpora Outdoor Recreation Facilities of which are to be delivered in accordance with P Recreation Facilities and New Housing Development Supplementary Planning Guid Additionally, there are plans for creating new facilities at Cosy Corner, including con creating employment opportunities. The plans for Cosy Corner include an all-new st which will feature new premises suitable for retail and start-up enterprises. The coun meeting space for community use, a parade square for the Sea Cadets and an offic well as changing facilities for users of the nearby marina. If funding allows, plans a enhance the scheme with new landscaping, public seating, a children's play area and of providing comfortable outdoor shelter from rain and the sun. In terms of car parking, it's acknowledged that a sound and robust parking strategy v of the regeneration. As part of the strategy, the site will accommodate a new multi ste Hillsboro car par enabling more ground floor space to be given over to public Consideration should be given to alternative future uses as, overtime, the aspiration Waterfront will be principally by public transport including p

## ch land, Policy ENT1 supports ts SP11 by safeguarding the e a range of different sites to

t Lake will be safeguarded for then the site could provide an attraction. Furthermore, the cilities and better landscaping ntage but also act, with others,

ercial units will be considered s and cafes will be particularly o the evening.

and commercial. In terms of prate Green Infrastructure and Policy COM10 and Outdoor idance.

ommunity facilities whilst also stone and glass-clad building uncil also wants to create new fice for the harbour master as s are in place that will further nd a canopy structure capable

y will be critical to the success storey car park on the existing plic realm and development. ion is that travel to Porthcawl , greatly reducing the number d support for the concept of a perties on Hillsboro Place.

hift towards increased use of ell as being part of the wider Portway of which will function neration site and town centre. the town centre. The Council erminus within the Porthcawl on with Cardiff Capital Region In terms of the proposed park to the limits of the current City rity. However, funding will be

107 2	A fresh consultation with open and honest access should be communicated dorectly to all Porthcawl residents in a timely manner.	A fresh consultation with open and honest access should be communicated directly to all Porthcawl residents	<ul> <li>Comments noted. In terms of consultation, it is the view of the Council that the Community Involvement Scheme (CIS) as originally set out in with the approved D the CIS have been met. It is also considered that the LDP has been prepared in 'Preparation Requirements' set out in the Development Plans Manual (Edition 3).</li> <li>The Council previously consulted the public on the Preferred Strategy of which was to 8th November 2019. Following the public consultation period the Council ware to the Council of a coordance with LDP Regulation 16(2) before determining LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 - Consultation Report) for publishing. This report was subsequently signed off by me As part of Stage 4 of the Delivery Agreement, the Council made an allowance for 6 public participation. This was to ensure a range of views could be considered as prive de consensus on the Replacement LDP's strategy and policies. A number of const o ensure efficient and effective consultation and participation, in accordance wit included:</li> <li>A Legal Notice was placed within the Glamorgan Gazette on 3rd June 2021</li> <li>The package of consultation documents were been made available online v Council's Website (www.bridgend.gov.uk/dpconsultation). Respondents electronic survey online to make a formal representation.</li> <li>Printed reference copies were placed within public facing Council buildings, County Borough (fixed and mobile), subject to social distancing guidelines, also available to view at the Council's Civic Offices in Angel Street, Bridger only as the offices had not re-opened to the public due to the pandemic. He were also been made available at these locations for members of the public.</li> <li>Dissemination of hard copies of information to individuals. Members of the copy of the survey by post to complete by hand (free of charge). There was a of the whole Deposit Plan to cover printing and postage costs for such alarge is providealy 500 re</li></ul>

the overall objectives of the Delivery Agreement, including in accordance with the LDP

as held from 30th September was required to consider all ng the content of the deposit – Preferred Strategy & Initial embers of Council.

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

via Bridgend County Borough were able to complete an

, including every library in the s. The reference copies were and, although by appointment ard copies of the survey form to complete by hand.

e public were able request a a £25 charge for a hard copy ge document.

as notified by letter or email f the Deposit Consultation. ow to access the package of ssed, additional representors

agement events for all Town

media posts were released rent thematic areas / parts of

working groups, including the

book one to one telephone ay have had. They were able

otice boards.

			Proposals for the Porthcawl Waterfront Regeneration site are currently being dev 'Placemaking Strategy' that represents a form of sub area masterplanning supp material. This will provide a coherent basis for guiding development, securing future and delivering a comprehensive range of regeneration projects. In addition, any fut for this site will be subject to a formal planning application where you can also have
329	yes personally my site ( ref 329.c1) meets the criteria of PPG and would make a desirable extension outside the settlement boundary, and can meet LVIA and adapt and harmonise to the surrounding area and fit in with the character and appearance of of the surrounding terraced houses with minor impact ,and a new dwelling would increase the range and choice available in the village that is dominated by older terraced houses ,the land itself has always been used has numerus buildings on there garages and its developed land in the brown field suitable for development was owned by the council for many years in the past and planning permission was granted on a few of the structures there and took rent for this has industrial and recent history domestic ancillary use ,partly inside ldp and and seen to outweigh the minor change in visual terms compare to some of the development that have been allowed within the valley , and should be included in the new ldp in my opinion , meets the requirements that meets for a small scale site close to the unban area and that can accommodate one dwelling with highways agreeable on access and would make a modest contribution to the regenerated upper valley community that is needed to improve the range and choices of housing to attract younger people and families with minor works involved has utilities all close by to accommodate this thanks you .	Include site in Nantymoel	Comments noted. All Candidate Sites were subject to a detailed assessment conformed with the Preferred Strategy and, if so, whether they were deliverable. Site hectares (including 329.C1) are too small for individual allocation and were there Settlement Boundary Review (See Appendix 38). The Council has reviewed all settle County Borough to determine if they are still appropriate in light of the Replacement L constitute appropriate amendments to existing boundaries. This included candidate st Terrace, Nantymoel). As detailed within the Review, the Replacement LDP Strategy as a location for strategic growth. Candidate site 329.C1 was considered to represent to the existing settlement of Nantymoel into the open countryside. Therefore, follow Replacement LDP has not proposed altering the defined settlement boundary of Na
614	I hereby object to the above proposal and	Concerns relating	The Deposit Plan has been prepared in accordance with Welsh Government Develop
	ask for this site to be deleted from the final LDP, on the following grounds. • Further housing is not necessary at this location. An evidence-based case has not been made. The West of Bridgend area has been the site of some 3000 new houses in recent years. This is already a disproportionate amount. It would be bad planning to add a further 850 houses to this area. To make this delicate site profitable, even so-called	to loss of green space, infrastructure, school's capacity, traffic, air quality, the historic environment and employment.	<ul> <li>3). It contains guidance on how to prepare, monitor and revise a development p evidence to ensure that plans are effective and deliverable and contribute to placement policy set out in Planning Policy Wales (PPW).</li> <li>The Deposit Plan has been underpinned by the identification of the most appropriat 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: Preferre Options). A range of growth scenarios across the whole Replacement LDP periodiscussed within the Strategic Growth Options Background Paper. This has called border and information of the strategic situation is likely to change from 2018-2033 and information.</li> </ul>

eveloped further as part of a pported by illustrative design re funding, attracting investors future development proposals ve your say.

It to determine whether they Sites measuring less than 0.25 erefore assessed through the ttlement boundaries within the nt LDP Strategy and / or would e site 329.C1 (rear of Osborne gy does not identify Nantymoel ent an inappropriate extension owing the Review, the Deposit Nantymoel to include this site.

opment Plans Manual (Edition plan, underpinned by robust making, as defined in national

iate scale of economic growth based judgements regarding red Strategy Strategic Growth riod have been analysed and considered how the County formed the most appropriate

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	"affordable" housing would be beyond the	response for the Replacement LDP. As such the Replacement LDP identifies an ap
	means of most young persons.	to enable a balanced level of housing and employment provision that will achieve sust
	Infrastructure is not in place to support	support existing settlements and maximise viable affordable housing delivery.
	further development. The local	
	comprehensive school, for example, has	The distribution of growth is further evaluated and justified in the Spatial Strategy C
	not yet caught up with the housebuilding of	(See Appendix 43 – Background Paper 3). The strategy prioritises the development
	the previous decade. The viability of further	periphery of sustainable urban areas, primarily on previously developed brownfield
	expansion of Bryntirion Comprehensive	on the delivery of the brownfield regeneration allocations identified in the existing
	School is very doubtful due to road access	Maesteg and the Llynfi Valley are still denoted as regeneration priorities thro
	constraints. Section 106 contributions from	Regeneration Growth Areas. The ongoing commitment to brownfield development
	a developer would therefore be futile for this	settlements accords with the site-search sequence outlined in Planning Policy Wal
	purpose. Sending children from the	developmental pressure on Best and Most Versatile (BMV) agricultural land. Howeve
	proposed site to other comprehensive	success in delivering development on brownfield land in other settlements (notably
	schools would violate the local place	Gateway), there are limited further brownfield regeneration opportunities remaining
	making principles stated in the draft LDP.	deliverable sites (including some greenfield sites) are therefore required to implement
	Other aspects of infrastructure including	housing in high need areas and ensure the County Borough's future housing require
	sewerage, drainage, NHS services, etc.	
	have not been anywhere nearly adequately	The Replacement LDP apportions sustainable growth towards settlements that alread
	addressed. • Further along the A473, air	services, facilities and employment opportunities and are most conducive to e
	quality testing in Park Street reveals it to be	development. As such, a Settlement Assessment has been undertaken (See Ap
	one of the most polluted locations in the	sustainable settlement hierarchy. Based upon the consideration of a comprehe
	county. Generating more traffic to use the	sustainable growth will be appropriately directed towards the Main Settlements of Bri
	A473 violates the sustainable development	with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.
	principles contained in the draft LDP. •	with the grouped Main Settlement of Fyle, Kening this and North Comeny.
	Further road traffic would also put further	The plan proparation has involved the assessment of 171 sites. Each condidate site h
		The plan preparation has involved the assessment of 171 sites. Each candidate site h
	strain on the A473 junctions with Elm	the criteria in the Candidate Site Assessment Methodology which was previously cons
	Crescent and Heol y Nant, the traffic lights	13 – Candidate Sites Assessment Report (2020)). During Stage 2 detailed assessment Report (2020).
	at Bryngolau, and the A48 Broadlands	based on any specific issues they raised in terms of their deliverability, general location
	roundabout, which is already strained for	existing use(s), accessibility, physical character, environmental constraints and opp
	capacity. This development would inevitably	were asked to prepare and submit a number of technical supporting studies
	lead to further traffic driving through the	deliverability, sustainability and suitability. Proceeding this detailed assessment,
	village of Laleston to access the A48 and	appropriate were included for allocation in the Deposit Plan. As such, candidate site
	thereby the M4. • The site has an inherently	was considered appropriate for allocation.
	rural aspect, it forms a green wedge	
	bordering a ward that is officially rural, and	As part of the proposed allocation of Land West of Bridgend, development will
	a ward that is officially urban. The overall	requirements including masterplan development principles and placemaking princ
	effect would be the urbanisation of the	PLA3 – Page 71). The provision of new residential dwellings, including affordable
	entire district. Urbanisation would violate	alongside a new one and a half form entry Primary School, recreation facilities,
	the council's objective of maintaining and	appropriate community facilities all set within distinct character areas.
	enhancing the natural resources and	
	biodiversity of the county borough. • This	Policy PLA3 will ensure development positively integrate the remains of Llangewyd
	green wedge is the location of the Laleston	Scheduled Ancient Monument in a manner that preserves and enhances the remains
	Stones Trail, and the Bridgend Circular	Development must also incorporate the Laleston Trail within the central part of the si
	Walk, and is a field, woodland and	Bridgend Circular Walk and realigned Public Right of Way. Furthermore, the enclos
	hedgerow system with an historical	hedgerow corridor will be retained as the Y Berth cross link. In terms of active travel
	heritage. Llangewydd Road and its	site and off-site measures to provide good quality, attractive, legible, safe and acces
	surrounding lane network have been	linkages in accordance with Active Travel design. Improved linkages must be prov
	identified by historians as a pre-historic	Bryntirion Comprehensive School and Bridgend Town Centre (including the bus stat
	ridgeway, a medieval pilgrims' way, Ffordd	connections will be provided to accord with the proposed routes within the Council's
	y Gyfraith ("The Way of the Law"), and a	BR-55, INM-BR-57, INM-BR-58, INM-BR-127 and 2120.

appropriate plan requirement ustainable patterns of growth,

v Options Background Paper nent of land within or on the ld sites. It continues to focus ting LDP, hence, Porthcawl, nrough their designation as nt opportunities within these vales and seeks to minimise ever, given the existing LDP's oly Bridgend and the Valleys ining. Additional viable and 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 is to demonstrate the site's at, only those sites deemed ate 308.C1 Bridgend (West of)

Il 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 il's ATNM: INM-BR-52, INM-

drovers' road. There is a strong possibility of Roman and Celtic archaeology on site. • The proposed site is criss-crossed by public rights of way which have been conscientiously maintained by the Community Council and which are highly valued by local people and visitors. Urbanising them would create a miserable aspect, which the developer's proposals for "corridors" would not mitigate. Developers would leave the site transferring corridor maintenance costs onto the community. • No evidence has been produced to show that the commercial benefits of building at this location would more than outweigh the loss of positive social value of the site in its current condition. Overall, there would be a severe loss of visual, social and public amenity. • The loss of the rich and diverse flora and fauna of the woodland, fields and hedgerows is not justified by any commercial benefit from this development, particularly when there are brownfield sites more suitable for such developments all over the borough. This is a greenfield site which is a barrier between Laleston and Bridgend, it should not be built over when there are numerous suitable brownfield sites across the county borough . This urbanisation would create an undesirable precedent for further urbanisation to south, north and west. It would move the built-up area's boundary, making further greenfield development difficult to resist. This would cause further coalescence, with Broadlands to the south, Penyfai to the north, and Pyle in the towards west. • Any large scale housing developments need to be within easy access of the M4. The only links from this site to the M4 are through Laleston, Bridgend or Broadlands, all of which are already over congested with traffic. The logical places for large scale housing developments in the borough would be near the motorway junctions at Pencoed, Sarn and Pyle, not on a green field site which is the only natural barrier between the historic village of Laleston and Bridgend's urban sprawl. Building on this site would coalesce the community

The Replacement LDP is accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive component within the Plan (strategy, policies, site allocations, etc.) and any identified reasonable alternatives. This builds directly upon previous SA reporting including an SA Scoping Report (2018) and an Interim SA Scoping Report (2019) which accompanied the Replacement LDP Preferred Strategy. The Deposit Plan SA Report demonstrates how the SA, incorporating SEA, process has informed the development of the Deposit Plan, including the incorporation of recommended changes within the document. As a result, the SA Report concludes that there is good coverage of all key sustainability issues in Deposit Plan, with plan components performing well against the SA Framework. It also identifies strong compatibility between the LDP Vision/Objectives and the SA Framework, plus no likely significant adverse effects (taking account of mitigation in all its forms).

In accordance with statutory requirements, Planning Policy Wales sets out multiple requirements for development to avoid direct adverse effects on nationally important heritage assets and for the need for any development resulting in adverse effects on the historic environment to be robustly justified. There is also a general presumption in favour of the preservation or enhancement of listed buildings and their settings, along with a requirement for development not to result in direct adverse effects on Scheduled Monuments, unless there are exceptional circumstances. These issues are grouped under 'Cultural Heritage', which is one of the 14 Sustainability Objectives considered by the SA. The potential for adverse impacts on Cultural Heritage was and is an important consideration in determining the overall sustainability and thus suitability of candidate site allocations. Any sustainability impacts would also depend on the scale of development proposed.

All Stage 2 Candidate Site Sites were considered to ascertain whether they had the potential to cause an adverse impact upon the historic environment. To facilitate this assessment, the Council consulted with the Glamorgan-Gwent Archaeological Trust (GGAT) early on in the process for their views on the likely range of impacts on the historic environment along with recommendations for mitigation. Any identified impacts were required to be mitigated by site promoters.

For Land West of Bridgend 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.

	boundaries of Bryntirion and Laleston, contrary to good planning principles. • The lane to the west of the site alongside the circus field is already used as a 'rat run' by drivers and is already dangerous for walkers and cyclists for this reason. This development would only exacerbate this problem. • In a nutshell, this proposal puts	While there is a small amount of evidence for late prehistoric and Roman a 1km study area, the potential for archaeology of these periods within the site is de- settlement was focused elsewhere in the locality and any archaeology of this per likely to relate to agriculture. Overall, the baseline data indicate that the probability being present is low. Any further archaeological investigation can reasonably appropriately worded planning condition appended to a planning permission.
the wrong type of development with the wrong type of houses in the wrong location when there are far more suitable locations for development all over the borough, primarily adjoining M4 junctions. A case is not made and the proposal should be set aside and not progressed in the LDP.	the wrong type of development with the wrong type of houses in the wrong location when there are far more suitable locations for development all over the borough, primarily adjoining M4 junctions. A case is not made and the proposal should be set	Potential impacts upon the setting of historic assets in the locality have focused or significant effects arising from changes to setting have been identified for scheduled n and registered parks and gardens. In respect of the Laleston Conservation Area, significant changes to its visual setting. It is acknowledged that development in the s remove a part of the agricultural landscape around Laleston which forms a b east. However, agricultural land will remain on all sides around Laleston, which will discrete settlement, while landscaping measures associated with the develo impression of coalescence. This is assessed as an impact of a minor order, with conservation area being retained. Policy PLA3 will require development to to maintai between the site and Laleston to retain the separate identities and character o preventing coalescence.
		The site promoter also commissioned EDP to undertake a Landscape and Visual Ap of the appraisal was firstly to inform the design evolution of the scheme which enable to potential landscape and visual opportunities and constraints.
		The LVA outlines that there are adverse and beneficial landscape effects resulting from However, the embedded mitigation and the approach to design is considered to mini- 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 h
		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 Brynti design is sensitive to the site's existing characteristics. The design appraised respon- site such as the Bridgend Circular Walk, the byway, the hedgerow network and veg such the proposals put forward at this stage are considered to be a thoughtful and development of this site.
		Mitigation measures include:
		<ul> <li>The Laleston Meadows SINC would be brought into regular long-term manage the visual amenity and landscape character of this northern part of the site. A development back from the SINC, and dwellings would front onto it. The mitigation receptor site (in ecological terms) and the grazed fields currently improved by the proposals as well as maintained in the long term. The SINC or informal and natural play on site provided increased public access would ne function;</li> <li>The site contains very few of the key characteristics listed in the published dot</li> </ul>

activity in the surrounding leemed low. Post-medieval period within the site is most ity of significant archaeology be secured through an

I on the 1km study area. No d monuments, listed buildings a, there will also not be any e southern part of the Site will buffer from Bryntirion to the ill retain its character as a lopment will mitigate any ith the special interest of the tain a strategic green corridor of these settlements whilst

Appraisal (LVA). The purpose abled an integrated approach

rom development of this site. ninimise adverse effects over not considered unacceptable c housing site.

ter 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 onds sensitively to assets on egetated site boundaries. As and easily assimilated future

agement. This would protect A landscape buffer would set e SINC could be used as a tly within the SINC could be offers a great opportunity for not clash with its ecological

documents on Laleston SLA. the field pattern replaced by

<ul> <li>urban form. However, the retained hedgerows and trees would be protected some of the character of the SLA within which the site lies would be retained;</li> <li>Provision of structural landscaping, a mix of native and non-native trees and s the site for biosecurity, diversity of ecosystems and habitat creation as well as residents. Ares of open space would be bolstered by considered structura aesthetically pleasing urban development which is well integrated with the pr and the settled landscape character currently experienced in the local area;</li> <li>Retention of existing landscape features (hedgerows and trees) is a priority of it forms a desirable strong green framework that links with the wider green infra and south of the site;</li> <li>Adequate replacement planting of local species in appropriate locations to o trees and hedgerows, and enhancement planting; and</li> <li>The location of public open space, public footpaths and the street-alignment ha and reflect local character.</li> </ul>
Through consideration of the findings above, it is anticipated that any notable lar 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 m to address concerns of the site in relation to landscape and visual matters. As such 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 the inclusion of mitigation measures and provide links with the existing landscap safeguard landscape character whilst creating a sense of place. The development detriment of the Special Landscape Area and any development proposal must incor adverse effects and/or visual intrusion on the wider landscape.
In terms of biodiversity/ecology, an ecological desk study and Extended Phase 1 so 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 SI 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 and its associated designated features will be retained. Furthermore, such retain protected from potential harm, damage and disturbance through the sensitive design from SINC boundaries and inclusion of suitable buffers.
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 open When linked with proposed POS and play areas across the developable site this benefit to both visual and recreational amenity, conservation and biodiversity enhanced the SINC provides a potential space to accommodate ecological mitigation and and thus offset ecological impacts that may arise during the development of adjacent

ed by landscape buffers and d;

I shrubs proposed throughout as the visual amenity of future ctural planting to create an proposed landscape strategy

of the emerging proposals as frastructure to the north, west

compensate for any loss of

has been designed to protect

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

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

e landscape in which it sits, s must be minimised through ape and access features to ent must also not be to the orporate measures to reduce

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

lanning submission will need atures, including the Laleston le Laleston Meadows SINC ained features will be further gn of built development away

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

	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 mast to locate development across those habitats of predominantly limited ecolor boundary habitats as far as possible. Where retained, such features have been account informal green space and sustainable transport links, which ultimately enhances contra and contributes to the wider green infrastructure resource.
	Where avoidance is not possible, however, and will result in the loss of interpredominantly 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 c 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 NRV the development to retain and provide suitable buffers to habitats, particularly he Ancient and/or Semi-Ancient Woodland) and Laleston Meadows SINC, which is bordering the northern and north-western boundaries of the site. PLA3 will also require and agree ecological management plans including proposals for mitigation, enhalted for 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. Addition hectares of retained green infrastructure and new areas of public open space as seven key areas of formal open space (including 0.5ha of equipped play pri and linkages, green streets, and explore the provision of enabling sensitive public Meadows SINC and woodland.
	In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been 37). The IDP provides a single schedule of all necessary infrastructure without allocated sites for the anticipated quantum of proposed housing/employment uses w not proceed. Such infrastructure includes transport, education, health, environment addition to community and cultural infrastructure.
	With regards to education and comprehensive school provision, a contribution will b the Education Facilities and Residential Development SPG and a decision will be ma Authority as to how the sum will be utilised.
	In terms of sewerage, Dwr Cymru Welsh Water have confirmed that reinforcement the clean and foul network to accommodate the site as a whole and a Hydraulic Mo

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

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

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

which are recommended to iate and proportional. These RW. Policy PLA3 will require hedgerows, trees (including includes the green space quire the developer to submit hancement and maintenance ) and provide appropriate

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

en produced (See Appendix t which the development of within the plan period could ntal management, utilities in

be taken in accordance with nade by the Local Education

t works are required on both Nodelling Assessment will be

required to inform such works. They have also confirmed that there are no insurn delivery of the site.
With respect of drainage, the site promoter has prepared a high-level drainage strat the site is located with DAM Zone A, which is used within Technical Advice Note considered to be little to no risk of fluvial or tidal flooding at such a location. This refle from NRW, and in the Strategic Flood Consequence Assessment (SCFA which info site as green in its RAG assessment. As such, all proposed land uses are permitte consequence assessment. The SFCA does highlight that a small proportion of the s flooding due to surface water, which corresponds with topographic depressions ru There are two areas most at risk of surface water flooding. The first corresponds w flowing down into the north western corner of the site. This area of the site is curren which is to be retained as part of the proposals. It is therefore considered that this a risk will have little influence on development proposals. The second area is a key su runs through the centre of the site towards the A473 where a small area of high surface The surface water flow routes in this part of the site will be retained where possible a surface water drainage strategy through the use of SUDs and green corridors.
A revised TAN15 is due to be implemented in June 2023. This will be supported Planning, which includes climate change information to show how this will affect floor century. It shows the potential extent of flooding assuming no defences are in place. Map for Planning shows the site to be located outside of any flood zone and is therefor risk of flooding.
In terms of the impacts on primary healthcare provision, the Council has been Morgannwg University Health Board from the outset of the Replacement LDP process to ensure the level and spatial distribution of growth proposed was clarified to help face provision. As part of Stage 3 of the Candidate Site Assessment, the health board as bodies were invited to provide comments in respect of those sites identified as suital and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately of healthcare services, close working relationships will continue and be maintained we University Health Board. This will be key to service provision planning as site allocation progress.
The site promoter commissioned Air Quality Consultants to undertake an Air Quality impact of the proposed development and subsequent increased traffic emissions traffic on the Air Quality Management Area (AQMA) of Park Street. Concentrations number of worst-case receptors, representing existing properties where impacts are addition, the impacts of traffic emissions from local roads on the air quality for future development have been assessed.
The assessment has demonstrated that concentrations of PM10 and PM2.5 will rem all existing receptors in 2022, with or without the proposed development, and that all i will be negligible.
In the case of annual mean nitrogen dioxide, concentrations will remain below the object receptor (representative of 6-8 homes) in 2022, with or without the proposed development considered unlikely that any new homes within the development will be occupied be would be reasonable to expect concentrations at these 8 homes to be below the object demonstrated that the impacts in terms of annual mean nitrogen dioxide concentrations

## rmountable obstacles to the

ategic of which confirms that e 15 to indicate that there is flected in comments received forms the LDP and flags the itted without need for a flood e site (4.9%) has a low risk of running from north to south. with a path of surface water ently comprised of woodland s area of surface water flood surface water flow route that ace water flood risk is shown. e and incorporated within the

d by the new Flood Map for ood risk extents over the next e. A review of the new Flood efore considered at low or no

en engaging with Cwm Taf ess. Early meetings were held facilitate alignment of service d amongst other consultation itable for future development control provision of primary d with Cwm Taf Morgannwg ations within the Deposit Plan

ty Assessment to assess the s arising from the additional ns have been modelled for a re expected to be greatest. In re residents on the proposed

main below the objectives at Il impacts for these pollutants

bjective at all but one existing elopment. However, it is now before 2024, by which time it bjective. The assessment has ations of the full development

	traffic being on the roads in 2022 will be negligible everywhere other than at this one under this scenario would be moderate adverse. However, bearing in mind that no n before 2024, and the development is unlikely to be complete and thus generating its 2030s, this scenario is unrealistically worst-case. Applying professional judgement, that the actual impact of the development at these 8 homes will also be negligible occupation in 2024.
	The effects of local traffic on the air quality for future residents living in the propose shown to be acceptable at the worst-case locations assessed, with concentrations bei objectives. As such, the overall operational air quality effects of the development are
	The proposed allocation is supported by detailed masterplanning work, including a identify a realistic dwelling yield on the site's net developable area. The Transpon number of dwellings the site is expected to deliver. This identifies the various transproposed 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 avenumber of dwellings does not require the original proposed site boundary to be expanse 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 no 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 corr by the proposed enhancements to the active travel network.
	The Replacement LDP aims to reduce private car reliance and help the County Bord 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 fac 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 appro- measures and infrastructure are not delivered. Therefore a Strategic Transport Asse has been undertaken to consider the impact of plan proposals and help guide a 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

ne receptor, where the impact new homes will be occupied ts full traffic volumes until the it, it is considered most likely ble in all years from the first

beed development have been being well below the air quality re judged to be 'not significant

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 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, acilities 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

			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 connections will be provided to accord with the Council's ATNM: INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58, INM-BR-12
			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.
			The site promoter's Transport Assessment confirms that the traffic effect of 850 dwell order of 269 and 243two-way movements in the AM and PM peak hours respectively, worst case as attitudinal change towards travel progresses. This quantum of trips eq per minute two-way, diluted across the local highway network. The assessme development provides opportunities to create a new western edge to Bridgend in a community facilities suitable for day to-day living. In this way, the transport case for n necessary to promote sustainable travel modes before the private vehicle. The of the travel planning and the locational advantages, together with the Mobility Strategy benefit for existing and new residents, significantly improving travel choice, fo social journeys and hence social inclusion. Working from home and from a thir Workhub will be encouraged from the outset, in line with Welsh Government's aspira
			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 environment proposed range of land uses will likely produce a wide range of significant beneficial
121 3	I write as a local resident and owner of part of the Strategic Site – West Bridgend which is being promoted by Llanmoor Development Co.Ltd. I have some understanding of the planning process and the need for BCBC to produce a Replacement or Review of their Local Development Plan. This requires the identification of sites for all land uses, including housing, employment,	Support for PLA3.	Support noted.
	infrastructure, community uses, retail etc, so as to meet the needs of the future		

ity facilities. Development will e, public transport measures, nd Local Transport Plan and

West of Bridgend, which are inclusive developments and orientated development that or vehicle dependency. Wellthe site to foster community providing safe pedestrian and gend Town Centre (including th the proposed routes within 127 and 2120.

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

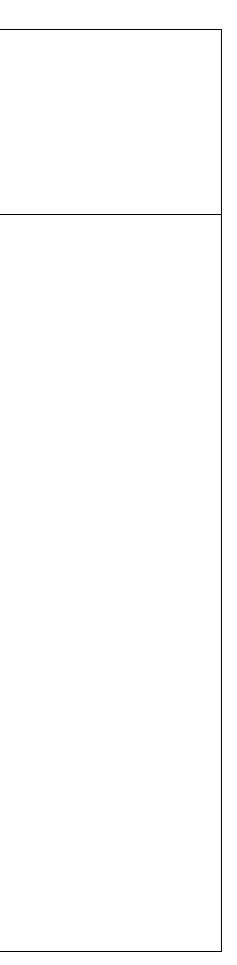
rellings is forecast to be in the ly, although this is considered equates to just over 4vehicles ment concludes that the a self-sustaining site offering mobility provides the options design of the environment, gy means there is a major for commuting, leisure and hird-place such as a non-site irations.

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

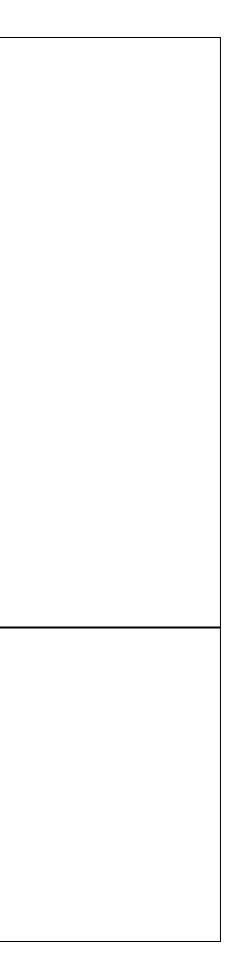
generations of Bridgend and surrounding areas. I have noted from my reading of the extensive background papers which support this Plan, how much work and detailed assessment goes into the selection of sites to meet the many and various criteria necessary to comply with sustainability, environment, placemaking and then all the technical issues which arise relating to each individual site. My understanding is that the submission of the West Bridgend site followed the appropriate assessment process. All the necessary technical reports have accompanied the submission of this candidate site through the LDP Review process and accordingly has been deemed to comply with the necessary policy requirements and duly included within the Deposit Consultation Document as an allocation for housing together with a primary school, community hub and extensive areas of Green Infrastructure, as well as providing public access throughout the site, which currently is clearly private property and connecting numerous areas of green space, parks and play areas. The site will also make provision for housing that is affordable including 170 units. I am aware of the detailed analysis that has gone into the Llanmoor submission, and it is therefore with great frustration that I read the content of the template letter being circulated by local councillors in opposition to this proposed allocation. The location of housing is I am told, according to them very controversial and nobody wants the allocation of extra housing near them, but indeed they are happy to have access to my agricultural land for exercising their dogs and often not limiting this to the public rights of way! The template objection letter contains many inaccuracies and clearly demonstrates that the majority of technical reports that accompanied the submission of my sites, have not been read, even though those councillors have access to the information. There is surely a duty on our elected members to take an impartial stance, certainly at the outset of this Consultation



		process and weigh up the facts, not the anti-		
		development rhetoric that is being		
		circulated. It is clear they have prejudged		
		and incited others to comment on their		
		factually incorrect template objection.		
		therefore urge officers and members to take		
		a balanced view of sites for inclusion in the		
		LDP Review and base these choices on		
		facts, sound informed opinions and material		
		planning considerations.		
	121	I write as a local resident and owner of part	Support for PLA3.	Support noted.
	5	of the Strategic Site – West Bridgend which		
		is being promoted by Llanmoor		
		Development Co.Ltd. I have some		
		understanding of the planning process and		
		the need for BCBC to produce a		
		Replacement or Review of their Local		
		Development Plan. This requires the		
		identification of sites for all land uses,		
		including housing, employment,		
		infrastructure, community uses, retail etc,		
		so as to meet the needs of the future		
		generations of Bridgend and surrounding		
		areas. I have noted from my reading of the		
		extensive background papers which		
		support this Plan, how much work and		
		detailed assessment goes into the selection		
		of sites to meet the many and various		
		criteria necessary to comply with		
		sustainability, environment, placemaking		
		and then all the technical issues which arise		
		relating to each individual site. My		
		understanding is that the submission of the		
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		assessment process. All the necessary		
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		included within the Deposit Consultation		
		Document as an allocation for housing		
		together with a primary school, community		
		hub and extensive areas of Green		
		Infrastructure, as well as providing public		
		access throughout the site, which currently		
		is clearly private property and connecting		
		numerous areas of green space, parks and		
		play areas. The site will also make provision		
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	told, according to them very controversial		
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	-		
	councillors have access to the information.		
	There is surely a duty on our elected		
	members to take an impartial stance,		
	certainly at the outset of this Consultation		
	process and weigh up the facts, not the anti-		
	development rhetoric that is being		
	circulated. It is clear they have prejudged		
	and incited others to comment on their		
	factually incorrect template objection. I		
	therefore urge officers and members to take		
	a balanced view of sites for inclusion in the		
	LDP Review and base these choices on		
	facts, sound informed opinions and material		
	planning considerations.		
874	We welcome the proposed Replacement		Comments noted
	Local Development Plan and its support for		
	maximising opportunities for active travel		
	and for promoting opportunities for the		
	provision of accessible, Natural and Semi-		
	Natural Greenspace (including Amenity		
	Green Space).		
	Ma baliava bawayar that it paada ta ga		
	We believe however that it needs to go		
	further in explicitly supporting wider		
	development proposals such as housing		
	development that enable the realisation of		
	these aims, such as the proposals at		
	Waunscil Avenue, Bridgend.		
	We look forward to engaging in the		
	Development Plan process in a constructive		
L		1	1



			-
	way as it progresses, and the Borough Council's consideration evolves.		
223	Policy SP6: Sustainable Housing Strategy Llanmoor support the Sustainable Housing Strategy set out in Policy SP6, in particular the provision for 9,207 homes. The housing requirement of 7,575 homes should be a minimum requirement as set out previously. Llanmoor also agree development should be distributed in accordance with the regeneration and sustainable growth strategy provided in Policy SP1 to ensure an appropriate and sustainable supply of housing.	To set a minimum housing requirement of 7,575 homes	The rationale for the Growth Strategy is detailed within the Strategic Growth Option the support for the Growth Strategy is noted. An appropriate flexibility allowance of into the Deposit Plan and the basis for which is clearly set out in the Housing Tra With a 10% flexibility allowance, the Anticipated Annual Build Rate (AABR) will ren the plan period even if a significant unforeseen scenario, such as non-delivery of a As such, the total level of housing provision within the Deposit Plan is set appropriate housing requirement. 7,575 homes is indeed the housing requirement.
	Policy COM1: Housing Allocations		
	Llanmoor support the inclusion of Land West of Bridgend being identified as a strategic site within the emerging housing allocations reflecting Bridgend's role as a Primary Key Settlement within the Settlement Hierarchy and Spatial Strategy. It further reflects the Sustainable Housing Strategy in Policy SP6.	None – support Land West of Bridgend as a Strategic Allocation	Comments noted.
	Policy COM3: On-site Affordable Housing		
	Llanmoor support the target affordable housing percentage of 15% for Bridgend Housing Market Area, whilst also supporting the 20% affordable housing contribution identified for Land West of Bridgend which have been drawn from the Local Housing Market Assessment, the Plan Wide Viability Assessment and site specific viability testing.		Comments noted.
610	I think I've made my point	No changes	Comments noted
720	Re SF1: Settlement Hierarchy & Urban Management Please note that the aerial images and photographs referred to in the below statement will be separately submitted by email to ldp@bridgend.gov.uk along with a further copy of this statement.	Amend the Settlement Boundary in Cefn Cribwr to incorporate the representor's land holding to the north of the former Dwr Cymru Reservoir Site	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 (See Appendix 19) has been sustainable settlement hierarchy. Based upon the consideration of a compreh sustainable growth is proposed to be appropriately directed towards the Settlement Pencoed and within the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly The Settlement Assessment clearly identifies Cefn Cribwr as a Local Settlement are vicinity would not accord with this classification. Of particular relevance is the fact C

ptions Background Paper and ce (10%) has been embedded Trajectory Background Paper. remain deliverable throughout f a strategic site, should occur. riately to ensure delivery of the

already benefit from significant to enabling transit orientated en undertaken to establish a rehensive range of variables ments of Bridgend, Porthcawl, elly'.

t and significant growth in this ct Cefn Cribwr is one of only a

Γ	Whilst acknowledging that Cefn Cribwr is	small number of settlements without an Active Travel route. Refer also to Backgroun
	appropriately classified as a Local	Options.
	Settlement, it is considered that the	
	settlement boundary should be amended to	Table 7 within the Deposit Plan (p.102) clearly identifies the level of growth attribution
	include an additional area of land as	outside of Growth Areas. This reflects the fact that Local Settlements perform
	indicated on the following Google Earth	community facility function, primarily serving their local residents. Whilst all services
	aerial image showing the proposed	to their respective hinterlands, those on offer in these settlements draw from a smal
	settlement boundary, the existing	primarily confined to serving the more immediate population base. As such, the sco
	settlement boundary, and the disused	accommodate significant development is more limited.
	reservoir site.	
		The Candidate Site Assessment clearly states that Cefn Cribwr is identified as a 'Lo
	The additional area currently possesses a	development should be contained within the existing settlement boundary. The area
	semi-urbanised brownfield appearance as it	representor was not submitted as a Candidate Site and is not supported by any bac
	is directly accessed from Cefn Road and	it is deliverable. It is also located outside the existing settlement boundary and
	accommodates a large rough hard surfaced	represent an unacceptable incursion into the open countryside.
	access and yard area along with a number	
	of long-standing lawful building structures	A Settlement Boundary Review (2021) was also published alongside the Deposit Pla
	and a well-maintained large garden area.	This study provides the background and justification for the review of the settlemer
	The building structures include a substantial	through the Replacement Local Development Plan (2018-2033). It includes a list
	machinery store (granted planning	considered when determining if and how an existing settlement boundary should b
	permission along with stables under ref.	maps and tables for the County Borough of Bridgend illustrating the proposed cl
	P/09/320/FUL) and a wooden 'summer	reasons for them. This Study did not propose any changes to the existing settlemer
	house' which was erected well over 10	
	years ago. These are served by existing	As such, the representor's proposal to extend the Cefn Cribwr settlement boundary t
	utility and drainage facilities and are	of the disused reservoir is not supported.
	indicated on the following 2009 Google	
	Earth aerial image and photographs.	
	It is my client's wish to retire to the wooden	
	summer house which will be upgraded,	
	preferably but not essentially with the	
	addition of a small extension. Alternatively,	
	my client will also be prepared to combine	
	the area with the adjoining disused covered	
	reservoir site which was previously granted	
	outline planning permission for residential	
	development on 9th June 2017 under ref.	
	P/25/244/OUT. It is understood the	
	permission is no longer extant and that	
	there are issues affecting the	
	development's viability, in which event the	
	incorporation of my client's land could help	
	to bring the development forward. In this	
	respect it is noted that the disused reservoir	
	site is included within the proposed	
	settlement boundary and presumably	
	reflects the Council's continued desire for	
	the development to be realised.	

## ound Paper 3: Spatial Strategy

ibutable to Local Settlements rm a more limited retail and ces and facilities are important naller catchment area and are scope for Local Settlements to

'Local Settlement' where new area of land referenced by the background evidence to show nd is therefore considered to

Plan consultation documents. nent development boundaries list of matters that have been d be changed. It also includes d changes and explaining the nent boundary of Cefn Cribw.

ry to include Land to the North

r		l.	
	Finally, my client and I will be very pleased to meet you on site, subject of course to strict adherence to any continuing relevant Covid restrictions, to assist your consideration of the proposed settlement boundary amendment.		
722	Re SF1: Settlement Hierarchy & Urban Management Please note that the aerial images and photographs referred to in the below statement will be separately submitted by email to ldp@bridgend.gov.uk along with a further copy of this statement. Whilst acknowledging that Cefn Cribwr is appropriately classified as a Local Settlement, it is considered that the settlement boundary should be amended to include an additional area of land as indicated on the following Google Earth aerial image showing the proposed settlement boundary, and the disused reservoir site. The additional area currently possesses a semi-urbanised brownfield appearance as it is directly accessed from Cefn Road and accommodates a large rough hard surfaced access and yard area along with a number of long-standing lawful building structures and a well-maintained large garden area. The building structures include a substantial machinery store (granted planning permission along with stables under ref. P/09/320/FUL) and a wooden 'summer house' which was erected well over 10 years ago. These are served by existing utility and drainage facilities and are indicated on the following 2009 Google Earth aerial image and photographs. It is my client's wish to retire to the wooden summer house which will be upgraded, preferably but not essentially with the addition of a small extension. Alternatively, my client will also be prepared to combine the area with the adjoining disused covered reservoir site which was previously granted outline planning permission for residential development on 9th June 2017 under ref.	Amend the Settlement Boundary in Cefn Cribwr to incorporate the representor's land holding to the north of the former Dwr Cymru Reservoir Site	The Replacement LDP apportions sustainable growth towards settlements that alre services, facilities and employment opportunities and are most conducive to development. As such, a Settlement Assessment (See Appendix 19) has been sustainable settlement hierarchy. Based upon the consideration of a compref sustainable settlement hierarchy. Based upon the consideration of a compref sustainable growth is proposed to be appropriately directed towards the Settleme Pencoed and within the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly The Settlement Assessment clearly identifies Cefn Cribwr as a Local Settlement a vicinity would not accord with this classification. Of particular relevance is the fact 0 small number of settlements without an Active Travel route. Refer also to Backgrour Options. Table 7 within the Deposit Plan (p.102) clearly identifies the level of growth attribu outside of Growth Areas. This reflects the fact that Local Settlements perform community facility function, primarily serving their local residents. Whilst all services to their respective hinterlands, those on offer in these settlements draw from a sma primarily confined to serving the more immediate population base. As such, the sc accommodate significant development is more limited. The Candidate Site Assessment clearly states that Cefn Cribwr is identified as a 'L development should be contained within the existing settlement boundary. The are representor was not submitted as a Candidate Site and is not supported by any ba it is deliverable. It is also located outside the existing settlement boundary and represent an unacceptable incursion into the open countryside. A Settlement Boundary Review (2021) was also published alongside the Deposit PI This study provides the background and justification for the review of the settleme through the Replacement Local Development Plan (2018-2033). It includes a list considered when determining if and how an existing settlement boundary should b maps and tables for the County Borough of Brid

Iready benefit from significant o enabling transit orientated en undertaken to establish a rehensive range of variables nents of Bridgend, Porthcawl, elly'.

t and significant growth in this et Cefn Cribwr is one of only a bund Paper 3: Spatial Strategy

ibutable to Local Settlements rm a more limited retail and ces and facilities are important naller catchment area and are scope for Local Settlements to

'Local Settlement' where new area of land referenced by the background evidence to show nd is therefore considered to

Plan consultation documents. nent development boundaries ist of matters that have been d be changed. It also includes I changes and explaining the nent boundary of Cefn Cribw.

ry to include Land to the North

	P/25/244/OUT. It is understood the permission is no longer extant and that there are issues affecting the development's viability, in which event the incorporation of my client's land could help to bring the development forward. In this respect it is noted that the disused reservoir site is included within the proposed settlement boundary and presumably reflects the Council's continued desire for the development to be realised. Finally, my client and I will be very pleased to meet you on site, subject of course to strict adherence to any continuing relevant Covid restrictions, to assist your consideration of the proposed settlement boundary amendment.		
271	Consultation map and strategy document, to confirm this is the start and the first letter of my consultation i am writing in regard to the bridgend local development plan, i meryl catherine wilkins am a consultee for the bridgend local development plan, i will be sending more of my consultation detailed letters to the planning department of the bridgend county borough councilin the next weeks, i do not agree and object to the deposit draft bridgend county borough council planning department replacement local development plan, i have tried to study and i am appalled in the way the I d p map and strategey has been presented for public inspection and consultation,please don't blame covid 19, to be able to put for public inspection and consultation I d p bridgend replacment local development plan -deposit draft statutory public consultion: 1st of june 2021 to 27th july 2021 the bridgend-county borough council has to show to be open and transparent with the map and strategy planning of the bridgend county borough, how can any member of the public be consulted when settlements and place names are illegible and nonexistent on the ldp consultation map and strategy provided by the planning depatment of the bridgend	Objects to consultation process / proposals map / removal of Green Wedges Objects to wording of paragraph 5.5.61 on page 201.	<ul> <li>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 LDP has been prepared in accordance with the LDP 'Preparation Requirements' Plans Manual (Edition 3).</li> <li>The Council previously consulted the public on the Preferred Strategy which was h 8th November 2019. Following the public consultation period, the Council we 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 met 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 pawide consensus on the Replacement LDP's strategy and policies. A number of const to ensure efficient and effective consultation and participation, in accordance wit included:</li> <li>A Legal Notice was placed within the Glamorgan Gazette on 3rd June 20.</li> <li>The package of consultation documents was made available online via Council's Website. Respondents were able to complete an electronic sur representation.</li> <li>Printed reference copies were placed within Council buildings, including Borough (fixed and mobile), subject to social distancing guidelines. The available to view at the Council's Civic Offices, by appointment only as the to the public due to the pandemic. Hard copies of the survey form were a locations for members of the public to complete by hand.</li> <li>Dissemination of hard copies of information to individuals. Members of the a copy of the survey by post to complete by hand (free of charge). There copy of the whole Deposit Plan to cover printing and postage costs for streement and organisation on the LDP Consultation Database was to inform them of the availability of</li></ul>

ent Scheme (CIS) as originally It is also considered that the s' set out in the Development

s held from 30th September to was required to consider all hing the content of the deposit 3 – Preferred Strategy & Initial nembers of Council.

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

## 2021

via Bridgend County Borough survey online to make a formal

ng every library in the County ne reference copies were also the offices had not re-opened also made available at these

the public were able to request re was a £25 charge for a hard such a large document. was notified by letter or email mately 500 representors were

county borough council the ldp public consultation map is confusing to read and does not show settlements and existing boundaries of each parcel of land, names of the'bridgend county borough large and small settlements are nonexistent and cannot be found with the naked eye, for true consultion to happen the books of maps and strategy proposal must be shown by the bridgend county borough council to be transparant and open with the general public, this is not shown to be happening, i cannot agree and i object to the way the bridgend county borough council has carried out the public consultation process I dp,

bridgend replacement local the development is fundermentally flawed settlement boundaries are not correct on the I d p map, for any true consultation process to proceed for public consultation, the boundarys of land must be clearly defined, this is not the case with the local development map and strategy this is causing confusion for everyone, the consultation process is fundamentally flawed

the map pages of the large and small scale communitys in the bridgend county borough jump from one community to another and do not run in sequence, porthcawl jumps to bridgend this only causes confusion for the public when reading the map, the porthcawl pages should run in sequence and also the bridgend, maesteg, and other map pages of communities in the bridgend county borough do not comply they are misleading the public consultation process,

the colours of the land in the I d p map do not reflect the colours in the I d p strategy document this is also fundamentally flawed, (white land between penyfai and cefn glas) white land on the deposit consultation map and strategy document does not show the true status and the policies affecting this whte land, this is misleading for consultees and the general public, white land has no

contacted, provided with details of how to access the package of consultation documents and how to respond. As the consultation progressed, additional representors were informed of and added to the database upon request.

- Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in the County Borough.
- A comprehensive social media plan was devised. A series of social media posts were released periodically on Facebook, LinkedIn and Twitter. They drew attention to different thematic areas / parts of the County Borough throughout the consultation period.
- Planning Officers have presented the consultation remotely to established working groups, including the Bridgend Community Cohesion and Equalities Forum and Youth Forum.
- In place of face-to-face public drop-in sessions, representors were able to book one-to-one telephone appointments with planning officers to discuss any queries/concerns they may have had.
- Posters were sent to all Town and Community Councils to display on their notice boards.

The Plan has to be prepared in the context of national legislation and guidance and has to be informed by an evidence base comprising of background papers and other technical documents. The written statement has been written with the aim of being understandable and not too technical or jargonistic, but its content must reflect the fact that it is a land use plan. The Plan has been accompanied by an easy read summary leaflet, and the opportunity for telephone calls on an appointment basis where Officers were on hand to help talk interested persons through the Plan, its policies and proposals and how to comment. All Local Development Plan documents were available in main libraries throughout the County Borough in addition to the Civic Offices via appointment. Guides on how to comment and register were available online. Additionally, the phone lines were manned between the hours of 9am-5pm weekdays to provide assistance. The Local Development Plan has to be written in a particular style to meet the guidance set out in the LDP regulations manual.

In terms of the Proposals Map (See Appendix 2), it is acknowledged that some of the labelling of settlements is difficult to identify due to the low resolution of the document. Likewise, there is some distortion between the colours used on the Map when viewed on a screen compared to a printed version. Both of these issues will be rectified when the Proposals Map is updated. However, the Settlement Boundary of each settlement is clearly shown on the Proposals Map. The ordering of pages of the Proposals Map follows the sequence of the Existing LDP and has been done this way for consistency. It is acknowledged that the colours on the proposals map have become distorted when saved to PDF and when printed onto paper.

However, the classification of 'white land' outside of defined settlement boundaries should not be confused. The Spatial Strategy of the Deposit Plan prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites. It continues to focus 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 Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the sitesearch sequence outlined in Planning Policy Wales and seeks to minimise developmental pressure on Best and Most Versatile (BMV) agricultural land. However, given the existing LDP's success in delivering development on brownfield land in other settlements (notably Bridgend and the Valleys Gateway), there are limited further brownfield regeneration opportunities remaining. Additional viable and deliverable sites (including some greenfield sites) are therefore required to implement SP1, deliver affordable housing in high need areas and ensure the County Borough's future housing requirements can be realised. These sites are clearly indicated on the Proposals Map as Strategic Development Sites (PLA1-5) and the settlement boundaries have been adjusted accordingly. Outside of the defined Settlement Boundaries, there is a presumption against development to ensure the integrity of the countryside is maintained. As such, proposals outside the settlement boundary will be assessed against Policy DNP1 – Development in the Countryside. This is regardless of whether the land in question is protected by other policies in the Plan or is shown as 'white'.

protection from developers and the development of large scale sprawling housing developments in the open countyside in the bridgend county borough, the result will be the coalescence of the communitys of cefn glas and penyfai, i do not agree and object to this happening to the green buffer zone farm land between penyfai and cefn glas which is now to be seen as white land in the draft bridgend local development plan, the field known as the phesant field penyfai is shown as white land and is under the threat of development by the bridgend county borough council, the field is used for football and recreation by the penyfai residents, public recreation policey, the field must be given green land status enabling more protection from development before any transfer of a leese for the field can go ahead with the newcastle higher community council,

(penyfai common land), penyfai common is a green buffer zone between the communitys of penyfai and aberkenfig and is show on the I d p map provided that the penyfai common land is under threat of being developed, i object and do not agree with the penyfai common land becoming white land in the proposed bridgend local development plan

the I d p map pages 20/21 land south of heol tynygarn is penyfai common land and is shown as white land, commoners including myself have common rights, i own my commeners rights and i do not agree and i am objecting to the penyfai common land being changed from green land to white land and also to any change of use for the penyfai common land in the draft local development map and policies penyfai common is the whole of the land north and south of the m4 motorway and heol tynygarn, penyfai common land is not in the ownership of the bridgend county borough council, documents from the land registry are not correct, the land marked in red is only an easement made with the glamorgan county council, and not with the bridgend

A Green Wedge Review (See Appendix 34) has been prepared to consider the need for such designations in the Deposit LDP. It reviewed the role and effectiveness of 14 green wedges in preventing coalescence between settlements in the existing LDP (including land between Penyfai and Aberkenfig and Penyfai and Bridgend). The Review found that whilst the Green Wedges designations has been successfully used for its primary objective of preventing coalescence, other policies contained within the extant LDP (particularly Policy ENV1: Development in the Countryside), have also been successful in preventing coalescence. Furthermore, the Review found that there are various policy mechanisms that can be used to achieve PPW's Green Wedge policy objectives. These include the definition of robust settlement boundaries around vulnerable settlements / communities, policies strictly controlling development in the countryside, protection of existing open and green space, biodiversity, landscape and the environment whilst also allocating sufficient land for housing to reduce development pressure. The findings of the Review have informed the development of specific policies in the Deposit LDP. (i.e. SF1: Settlement Hierarchy and Urban Management, SP1: Regeneration Growth and Sustainable Growth Strategy, SP2: Regeneration Growth Area and Sustainable Growth Area Strategic Allocations, SP17: Conservation and Enhancement of the Natural Environment, DNP1: Development in the Countryside, DNP4: Special Landscape Areas, DNP5: Local and Regional Nature Conservation Sites, DNP6: Habitats and Species, DNP7: Biodiversity, Ecological Networks, Habitats and Species, DNP8: Trees, Hedgerows and Development and DNP9: Green Infrastructure). It was therefore considered that the green wedge policy need not be taken forward in the Replacement LDP, as it will not be necessary.

As part of the technical supporting evidence base accompanying the Deposit Plan, the Council has undertaken an updated audit of existing outdoor sports and children's play space across the County Borough (See Appendix 22: Outdoor Sport and Children's Play Space Audit (2020)). Its findings can be used as means of justifying the provision of new facilities and/or remedying local deficiencies in provision. It can also be used as means of safeguarding and enhancing existing facilities as appropriate.

With specific regard to the land known as Pheasant Field, it is included in the Audit as amenity greenspace. As such, there are various policies within the Deposit LDP protecting its status (i.e., Policies SP9 & COM9). In this regard, the status of the field has not changed from the existing LDP.

Common land is not shown on the Deposit LDP Proposals Map. A Green Wedge Review (See Appendix 34) has been prepared to consider the need for such designations in the Deposit LDP. It reviewed the role and effectiveness of 14 green wedges in preventing coalescence between settlements in the existing LDP (including land between Penyfai and Aberkenfig). The Review found that whilst the Green Wedge designations has been successfully used for its primary objective of preventing coalescence, other policies contained within the extant LDP (particularly Policy ENV1: Development in the Countryside), have also been successful in preventing coalescence. It was therefore considered that the green wedge policy need not be taken forward in the Replacement LDP, as it will not be necessary.

Common land is not shown on the Deposit LDP Proposals Map. The land coloured in green denotes the location of Sites of Importance for Nature Conservation (Please see Policy DNP5(2)). The common land referred to by the representor is outside of the settlement boundary of Penyfai. Outside of the defined Settlement Boundaries, there is a presumption against development to ensure the integrity of the countryside is maintained. As such, proposals outside the settlement boundary will be assessed against Policy DNP1 – Development in the Countryside. This is regardless of whether the land in question is protected by other policies in the Plan or is shown as 'white'.

Paragraph 5.5.61 reads "...Planning permission will normally "**only**" be granted..." The wording of Policy DNP7 (Page 196 of the Deposit LDP) sets out the circumstances in which further information in support of a planning application will be required for development proposals on sites containing or adjacent to trees.

county borough council,there is no	
ownership of any penyfai common land by the bridgend county borough council	Coed-y-wernlys woodland is outside the settlement boundary. Outside of the define there is a presumption against development to ensure the integrity of the countrys proposals outside the settlement boundary will be assessed against Policy DN
boundaries of the penyfai common land are not shown correctly on the local	Countryside. This is regardless of whether the land in question is protected by oth shown as 'white'.
development map, penyfai common land at heol tynygarn penyfai is shown as white land,and the recreation field on the penyfai common land is also shown as white land,on the proposed bridgend local development map and stategy, i do not agree with the penyfai common land becoming white land and i am objecting to the penyfai common land penyfai, heol tynygarn penyfai and the recreation field	A Green Wedge Review (See Appendix 34) has been prepared to consider the net the Deposit LDP. It reviewed the role and effectiveness of 14 green wedges in preverse settlements in the existing LDP (including land between Penyfai and Bridgend incorp- woodland). The Review found that whilst the Green Wedge designations has been primary objective of preventing coalescence, other policies contained within the exit ENV1: Development in the Countryside), have also been successful in preventing co- considered that the green wedge policy need not be taken forward in the Replace necessary.
penyfai on penyfai common land being changed from green/yellow satus to white land status,the penyfai common land is under threat now and has no protection being white land,the penyfai common land must be protected from developers	Woodlands are not specifically shown on the Deposit LDP Proposals Map. Land to the outside of the settlement boundary. There is a presumption against development settlement boundary to ensure the integrity of the countryside is maintained. As a settlement boundary will be assessed against Policy DNP1 – Development in the Country of whether the land in question is protected by other policies in the Plan or is shown
now and in the future, the bondaries of the penyfai common land are not shown correctly on the draft bridgend local development map for public consultation, i do not agree and object to any penyfai common boundary changes shown on the bridgend ldp proposed map, penylan farm aberkenfig does not own any penyfai common land, the I d p map has failed to show the boundary between penyfai common and penylan farm land correctly, by doing this the bridgend local development plan map is fundermentally flawed	Land to the west of Penyfai is located outside of the settlement boundary. There development on land outside of the settlement boundary to ensure the integrity of the As such, proposals outside the settlement boundary will be assessed against Polio the Countryside. This is regardless of whether the land in question is protected by is shown as 'white'.
wood land types page 200	
protecting our trees, point 5.5.61 reads planning permission will normally be granted, i do not agree with the words normally be granted being used in this paragragh as there is no protection from development, coed wern lys penyfai is shown white on the I d p map which has been changed from the original green status, i do not agree and i am objecting to	

fined Settlement Boundaries, /side is maintained. As such, DNP1 – Development in the ther policies in the Plan or is

need for such designations in venting coalescence between orporating the Coed-y-wernlys been successfully used for its extant LDP (particularly Policy coalescence. It was therefore cement LDP, as it will not be

the west of Penyfai is located nent on land outside of the such, proposals outside the ountryside. This is regardless wn as 'white'.

ere is a presumption against the countryside is maintained. blicy DNP1 – Development in y other policies in the Plan or

being changed from green land to white	
land for development	

dpn 8: green infrastructure page 201

coed wern lys woodland is a penyfai protected woodland ,this is a broad leaf woodland ,policy by the wesh government say more broad leaf woodland must be planted because of the climate change, public enquirey i attended stated the coed wern lys woodland penyfai is protected broad leaf tree woodland, the policity is to protect broad leaf woodland from any development and for housing, planting broad leaf trees come under climate change policies, i am objecting and do not agree with the proposed bridgend local development map that shows, the coed wern lys woodland penyfai has been changed from green land to white land for development

coed y hela woodland penyfai has been seperated into two woodlands the boundary line between mr howard griffiths of pant farm court colman boundary is not defined and shown, neither is the scout hall court colman road shown on the I d p map provided,this is not a true picture and plan of the coed y hela woodland penyfai in the draft proposed bridgend local development map book for public consultation, i do not agree with the map and i am objecting to the way the bridgend plannng department has shown the coed y hela woodland penyfai on the proposed bridgend local development map ,

the I d p map is fundermentally flawed land off heol eglwys next to penyfai school farm land reaching from penyfai church in wales school to court colman manor, including ton gwyn farm land court colman and beyoned, is shown as white land, in the proposed bridgend local development map this is farming open countryside and is of special historial farming interest to penyfai, i do not agree and i am objecting to any change of use of this farm land and to any proposal



	made by a developer to develop this farm land for housing, this is the start of my consultation process, i will be sending more of my bridgend local development plan, planning concerns in the next weeks,		
103 8	Re SF1: Settlement Hierarchy & Urban Management Proposed Amendment To The Coity Settlement Boundary Please note that the aerial image referred to in the below statement will be separately submitted by email to ldp@bridgend.gov.uk along with a further copy of this statement. It is considered that the eastern extent of the Coity settlement boundary is too tightly drawn and unnecessarily excludes existing Coity residential properties. It is therefore proposed that it should be amended and extended as indicated on the following Google Earth aerial image which shows the existing settlement boundary in red and the proposed settlement boundary in dashed red and blue. The proposed extended settlement boundary also includes an existing small field that is used to accommodate my client's horses and is therefore unconnected with the agricultural use of his agricultural buildings immediately to the east and/or the land he farms elsewhere. In addition to the existing dwelling known as Slade, which my client owns and currently occupies with his 36 years old son, it is my client's wish to provide the following: a) A new separate dwelling for his daughter and her family; and, b) A menage within the rest of the field paddock in order to facilitate his family's full enjoyment of his horses. Please note that the proposed separate new dwelling is required because of my client family's exceptional personal circumstances. In this respect, my client's son unfortunately suffers from Angelman Syndrome (a rare debilitating neurological disorder), epilepsy and diabetes and	amendment to the Coity Settlement Boundary	Comments noted. The Settlement Assessment Study (see Appendix 19) classifies Coity as being within of Bridgend, which is defined as a Sustainable Growth Area in the Replaceme However, the LDP proposals map shows the village of Coity to be outside of the Su to its physical separation from the main settlement of Bridgend. A Settlement Boundary Review (see Appendix 38) was published alongside the documents. This study provides the background and justification for the review of th boundaries through the Replacement Local Development Plan (2018-2033). It inc have been considered when determining if and how an existing settlement boundary includes maps and tables for the County Borough of Bridgend illustrating the propos the reasons for them. This Study did not propose any changes to the existing s proximity of the site. The Settlement Boundary Review sets out a clear methodology for assessing p settlement boundary. When measured against the 5 criteria considered in St representor's proposals fail to meet any of them. The land proposed to be inclu- boundary is a greenfield site that is visually, functionally and physically separated fro urban area. When assessed against the criteria included in Stage 2 of the revier considered as a change to the settlement development boundary that would allow strategic edge of settlement allocations. However, in this context, when compared to are carried forward as allocations in the Plan, the site is less sustainable in that it is la ad services to Bridgend town centre with poor pedestrian connectivity. The site w the dependency on the private car and therefore not encourage a modal shift to active travel. It is therefore considered to represent an unacceptable incursion into th the representor's proposal is not supported.

nin the primary key settlement nent LDP (See Policy SP1). Sustainable Growth Area due

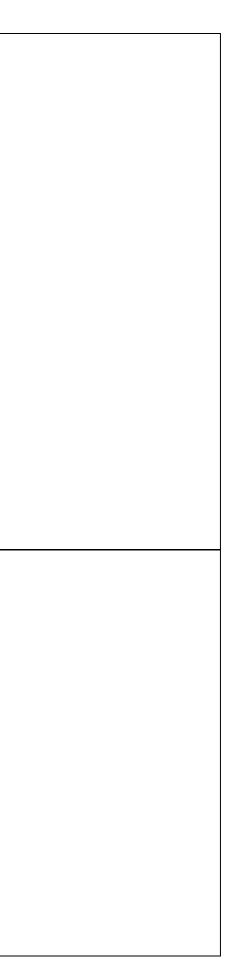
he Deposit Plan consultation of the settlement development includes a list of matters that ary should be changed. It also posed changes and explaining g settlement boundary within

proposed extensions to the Stage 1 of the review, the neluded within the settlement from the extent of the existing view, the proposal falls to be ow for the allocation of a nonto other sites in the area that s located further from facilities e would lead to an increase in to more sustainable forms of o the open countryside; hence,

	requires 24 hours care. This is currently provided by a combination of one qualified carer and my client because the care package does not fund a second qualified carer. As such, my client's daughter wishes and needs to move home so that she can be very close by, and therefore far more readily available, to help her ageing father look after her brother generally, and especially during the times when 2 carers are needed to deal with certain situations such as his epileptic episodes. At the same time, it is entirely reasonable and understandable that my client's daughter and her family wish to occupy their own separate dwelling. Please also note that the new dwelling would share use of the existing dwelling's access from the main road. In this respect, the existing access is not suitable for the provision of a more intensive residential development, and the provision of a new separate access would have adverse		
	hedgerow removal and highway safety consequences. Alternatively, my client would be prepared to exclude the majority of the field, i.e. the horse paddock and menage / paddock area, from the revised settlement boundary and additionally reinforce this demarcation 'on the ground' by the provision of a new substantial hedgerow located between the proposed new dwelling / garden area and the paddock / menage. Finally, my client and I will be very pleased to meet you on site, subject of course to strict adherence to any continuing relevant Covid restrictions, to assist your consideration of the proposed settlement boundary amendment.		
254	Policy ENT8: Non A1, A2 and A3 Uses Outside of Primary Shopping Areas It is assumed that Policy ENT8 is intended to apply to Secondary Shopping Areas. If so, the policy is less flexible than the criteria based approach set out in Policy ENT7. Policy ENT7 allows for non-Class A1, A2 or	Query whether Policy ENT8 applies to Secondary Shopping Areas	It is acknowledged that the wording of Policies ENT7 and ENT8 could cause some apply to development proposals in primary and secondary shopping areas and proposals outside of primary and secondary shopping areas but within the bounda Centres. The policy wording will be amended ahead of submission of the Replace

ne confusion as to which criteria nd which apply to development daries of Retail and Commercial acement LDP.

	A3 uses within Secondary Shopping Areas subject to meeting two criteria. In comparison, Policy ENT8 restricts the change of use (to non-Class A uses) of groundfloor units where it would result in the loss of existing Class A1 floorspace. Policy ENT7 does not explicitly restrict the change of use of units within Secondary Shopping Areas where it would involve the loss of existing Class A1 floorspace. <b>Policy ENT9: Retail Development</b> <b>Outside of Retail and Commercial</b> <b>Centres</b> Our client supports the recognition in the supporting text to Policy ENT9 (Paragraph 5.4.69) that new proposals for retail development should be focused on locations within the retail hierarchy. We also support the requirement for any further expansion of the Bridgend Designer Outlet Village to be subject to compliance with the uses specified by the Section 106 agreement.		
400	Policy COM3: On-site Affordable Housing Jehu notes that there is a 0% target affordable housing contribution identified for Maesteg and the Llynfi Valley Housing Market Area (HMA) under Policy COM3 and that the allocation for COM1(3) land south east of Pont Rhyd-y-cyff has a 15% target affordable housing contribution which have been identified having regard to the Local Housing Market Assessment, the Plan Wide Viability Assessment and site specific viability testing. Jehu are supportive of a 15% affordable housing target and are in agreement that affordable housing should be delivered on-site in the first instance. Summary Overall, Jehu are in support of the RLDP, specifically with regard to land south east of Pont Rhyd-y-Cyff being allocated for housing under Policy COM1.	wide and site- specific affordable housing targets within Maesteg and the Llynfi Valley.	Comments noted.



	Further justification has been provided to demonstrate why it is considered development of the site will not result in likely significant adverse effects. Finally, Jehu maintain the site is viable and deliverable within the first phase of the RLDP period mainly due to the site being developed led and a substantial amount of technical background work has already been undertaken. It is considered the delivery of housing in this location is both logical and sustainable in meeting much needed market and affordable housing.		
550	It is a prime opportunity to expand maesteg as it is the only town that is holding onto its community values, in comparison to Bridgend which is a ghost town.	No changes proposed – support expansion of Maesteg	Comments Noted
554	Would like to be kept informed with developments	No changes proposed	Comments Noted
287	Fully support the inclusion of the former four sevens service station as an allocation and are fully committed to working with the LPA to submit appropriate pre-application advice request to support the site through the examination process.	No changes proposed – support allocation of COM1(4)	Comments Noted
170	Monitoring Objective: Strategic Objective 2, The HBF suggests a requirement to reconsider affordable housing requirements as a result of a change in viability triggered by changes in house prices/material costs.	Include a monitoring mechanism to reconsider affordable housing policy requirements.	The Plan-Wide Viability Assessment (2021) was prepared to determine the ext contribute to the need identified for affordable housing across the County Boroug Assessment considered the broad levels of development viability across the Count Market Areas as identified within the LHMA and was supplemented with site-spec sites key to delivery of the Plan. This process informed the contribution that sites (w can make to the delivery of infrastructure, affordable housing and other policy red wording of Policy COM2 itself, planning applications that comply with this Policy w and it should not be necessary for viability issues to be considered further at planni due to the robustness of the evidence base. However, Policy COM2 does already evaluate affordable housing contributions in exceptional circumstances. The prop "deviation from the affordable housing percentages specified will only be acceptable demonstrate that particular exceptional circumstances justify the need for a viability application. In such rare instances, the applicant must provide all information, evid Council on an 'open book' basis". This proposed policy clearly contains a mechanis issues cited by the representor on a site by site basis and is considered approp development economics over the plan period. As such, incorporating a monitoring mechanism to facilitate a wholesale change housing policy (in the event that house prices or material costs change) is not s
			Viability Steering Group Meetings, a number of Steering Group members advised viability components in isolation and stressed the need for any development viab comprehensive re-consideration of all viability inputs. Within any broad housing mar be pockets of higher or lower viability, the nuances of which can never be fully cap COM2, as worded, provides a mechanism to enable such nuances to be consideration in exceptional, site-specific circumstances. The proposed change is not

extent to which the LDP can ugh over the plan period. The unty Borough's seven Housing ecific viability testing for those (within different market areas) requirements. As stated in the y will be assumed to be viable nning application stage. This is dy contain a mechanism to reoposed policy wording states, able if the applicant can clearly ility assessment at the point of vidence and justification to the anism to deal with the potential ropriate to deal with localised

ge to the plan-wide affordable at supported. Moreover, during sed against considering single iability re-appraisals to involve market area, there will inevitably aptured in an area-wide study. Insidered as part of a planning not supported.

407	COM10: Provision of Outdoor Recreation Facilities Drawing on the standards contained within the Fields in Trust "Guidance for Outdoor Sport and Play" document, this policy sets out the amount of different forms of public open space that should be provided on development sites based on the size of the population derived from a development. HD Ltd do not question the need for the provision of a range of high quality public open spaces (and their live application for a Community Indoor Tennis Centre at Island Farm demonstrates this commitment to sport and leisure) but it is essential that these standards are applied with a degree of flexibility and with consideration of existing provision nearby. As an example, for the "Land South of Bridgend (Island Farm)" site a different level or mix of public open space may be more appropriate given its proximity to existing playing pitches at Newbridge Fields and with a Community Indoor Tennis Centre to be constructed onsite. It is therefore suggested that the policy is amended so that it reads as follows: "Provision of a satisfactory standard of outdoor recreation space is required on all new housing developments, based—on following standards: 1) 1.2 hectares per 1,000 population for Playing Pitches; 2) 1.6 hectares per 1,000 population for Char Outdoor Sports (non-pitch); 3) 0.25 hectares per 1,000 population for Guidoor recreation space is required on all new housing developments, based—on following standards: 1) 1.2 hectares per 1,000 population for Char Outdoor Sports (non-pitch); 3) 0.25 hectares per 1,000 population for Equipped/Designated Play Areas; 4) 0.3 hectares per 1,000 population for Guidoor Provision; 5) 0.2 hectares per 1,000 population for Allotment provision; The Fields in Trust standards provide a useful benchmark but the nature and type of provision will be informed by the findings of the latest Outdoor Sport and Children's Playspace Audit and Allotment Audit as well as the availability and proximity to existing	Proposed changes being sort to Policy COM10.	All new housing developments will be expected to include an appropriate level of o amenity purposes in the interest of Good Design. This is an integral means of deliver Objectives, including to reduce social and economic equalities and ensure he environment. COM10 is based on Fields in Trust recommended benchmark guidelin endorsed by the National Society of Allotment and Leisure Gardeners. The standa are not intended to represent minimum provision on all developments. As stated with of a satisfactory standard of outdoor recreation space is required on all new housis nature and type of provision will be informed by the findings of the latest Outdoor Spo Audit and Allotment Audit". On-site provision must comply with the accessibility benc the Outdoor Recreation Facilities and New Housing Development SPG. As such, th and provide more flexibility to depart from standards recommended by Fields in Trus Policy COM10 is considered appropriate in its current form.
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f outdoor recreation for public vering several Local Wellbeing healthy choice in a healthy lines and allotment standards dards detailed within COM10 vithin COM10 itself, "provision using developments" and "the port and Children's Playspace enchmark standards set out in , the proposal to alter COM10 rust, is not supported.

outdoor recreation space. On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG." Changes sought: revisions to wording of policy COM 10 as above. 3 Para 10.2 Inspector's Report (valeofglamorgan.gov.uk) 21		
COM3: On-Site Provision of Affordable Housing This policy relates to affordable housing. As well as setting a requirement for affordable housing to be delivered onsite and setting guidance on viability matters, the policy sets out the target affordable housing percentage for each Housing Market Area as well as for the various allocations. The approach taken is for a higher affordable housing contribution on allocations when compared to the Housing Market Area. HD Ltd has prepared High Level Viability Assessments for the "Land South of Bridgend (Island Farm)" and CraigY-Parcau sites that it is promoting. These demonstrate that the delivery of both sites is viable with 20% affordable housing provision. Paragraph 5.108 of The Development Plans Manual Edition 3 (March 2020) states that: "It may be necessary to have separate targets for key sites if the evidence base suggests this is more appropriate." Whilst High Level Viability Assessments prepared by HD Ltd demonstrate that a 20% affordable requirement is viable, no justification is provided as to why there is a different target affordable housing requirement for allocated sites. Changes sought: Unless a justification is provided as to why a different target affordable housing requirement is being proposed on allocated sites then the same target affordable housing requirements	Proposed changes being sort to Policy COM3.	The rationale for the area-based and site-specific policies is clearly set out with Background Paper. Within any broad housing market area, there will inevitably be viability, the nuances of which can never be fully captured in an area-wide stur Development Plans Manual, "much more insight can be gained which can result in targets, as opposed to the broader area identified in the high level appraisal. The rather the site specific being a refinement of the high level appraisal" (WG, 2020, par to the area-wide affordable housing requirements within COM3, there are also site- requirements. The former are based on the Plan-Wide Viability Assessment, the latte viability testing, which has involved analysis of more specific costs, constraints and si faceted approach is paramount to ensure Council's aspirations for delivering high-qu both realistic and deliverable. This evidence has indicated that higher levels of a supported on certain sites as detailed within COM3.

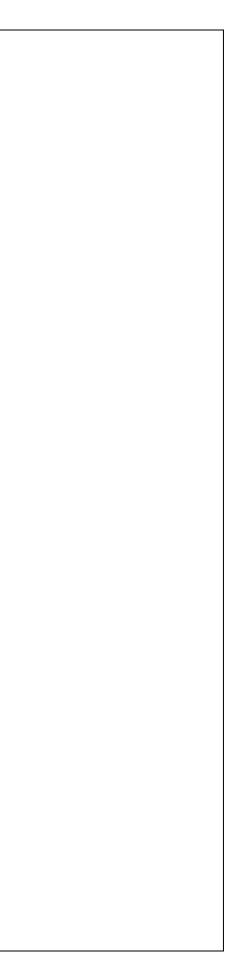
within the Affordable Housing be pockets of higher or lower study. As outlined within the in refined affordable housing the two are not contradictory, para 5.89). Hence, in addition te-specific affordable housing atter are based on site-specific d site requirements. This dualn-quality new communities are of affordable housing can be

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should be set for allocated sites as for the Housing Market Area that they sit within.		
<b>ENT1: Employment Allocations</b> This policy lists a series of sites totalling 71.7ha that are allocated for employment purposes which are required to meet the LDP's Employment Land Strategy. HD Ltd support the removal of the northern and eastern part of Island Farm as and Employment Site (as it is in the adopted LDP) and support it forming a Strategic Allocation in the Replacement LDP.	Support for Policy ENT1	Comments of support are acknowledged.
Support: Policy ENT1 and the allocations within it is supported. ENT9: Retail Development Outside of Retail and Commercial Centres This policy identifies a series of established bulky goods and convenience retail operations within BCBC within which listed uses will be acceptable, before setting the framework for assessing proposals for retail floorspace outside of designated town centres. The Masterplan prepared by Roberts Limbrick for the "Land South of Bridgend (Island Farm)" site allows for a 0.18ha "Community Hub" which is likely to include community uses as well as a modest retail and food and drink element to serve residents of the site. Whilst clearly not its intention (given the second part of Policy ENT6), the effect of Policy ENT3 could be prevent the delivery of such uses and therefore it is suggested that the following sentence is added at the end of the policy: "Small scale retail and food and drink uses	Proposed changes being sort to Policy ENT9.	Comments noted. The proposed change adds clarity to the policy ENT9 and w submission version of the RLDP. Recommendation: Proposed change accept suggested wording - "Small scale retail and food and drink uses will be permitted as where the proposals are in accordance with Policies PLA1-5".

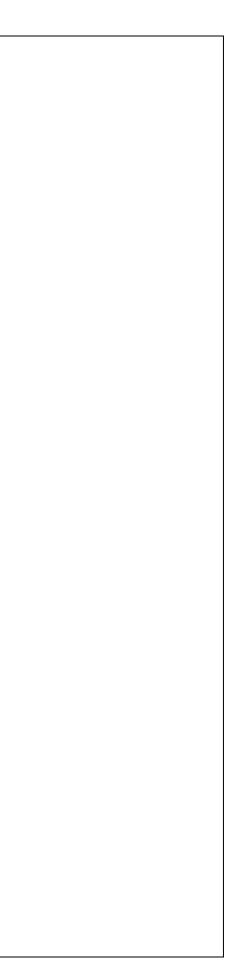
d will be incorporated into the epted with slight variation of as part of Strategic Allocations

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	proportionate scale which serves the population that the development would be created." Change sought: revise policy ENT9 as above.		
425	In summary, important changes are required to the plan to ensure its soundness. We object to the level of growth (which should be increased), the overall spatial strategy (which should direct a greater level of growth to Bridgend as the most sustainable settlement) and the overreliance on LDP rollover allocations at Parc Afon Ewenni and Porthcawl Waterfront. These issues need to be addressed to ensure that the plan is appropriate and effective. Land west of Tondu Road represents an unconstrained, suitable and deliverable site within the Bridgend Sustainable Growth Area. Its development would accord with the Site Search Sequence, the National Sustainable Placemaking Outcomes and Sustainable Transport Hierarchy set out in PPW. We would strongly urge the Council to allocate the site to contribute to the overall soundness of the plan.	Changes required to the plan to ensure its soundness	Comments noted. Please see responses addressed in the relevant themes/questions.
133 5	The representor supports the principle of regeneration growth areas and in particular the regeneration of Porthcawl Waterfront. However, for reasons explained below, the representor objects to the detail of the strategy as set out in the Deposit LDP as we consider the evidential basis for it to be unsound. The development of the Porthcawl Waterfront site has been an ambition of the Council for approximately 20 years and in adopted SPG or the development since 2004, without delivery of a single dwelling. The Seven Bays SPG was reviewed in 2007 by the Design Commission for Wales and part of its feedback to the Council was "The Commission was not convinced about the economic viability of the plans and the scale of the development proposed, even in the		

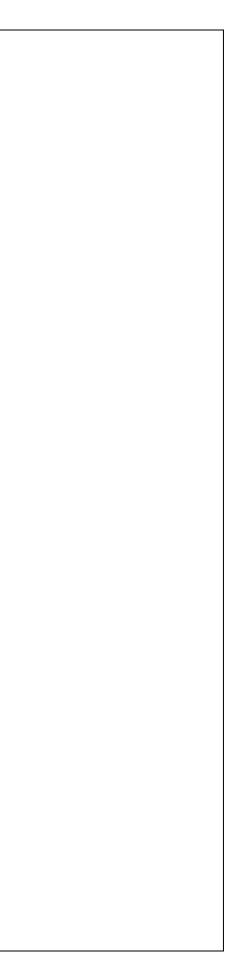
peak market of 2007"1 . In late 2019 the Credu charity was given a lease to bring forward the leisure element of the development adjacent to the harbour, but this development failed for viability and the land was reclaimed by the Council.		
Against this background, the roll-over of the Porthcawl Waterfront site in the review LDP was understandably the subject of concerns from parties, including the HBF, at the Preferred Options stage. Major concerns were expressed that the plan's delivery of housing was highly dependent on the viability of this and the other roll over PLA sites and that on the evidence, viability had not been demonstrated.		
In its response to these representations at Paragraph 3.90 presented to the Council officers2 responded: "The rationale for re- allocating these sites is well documented within Background Paper 4: Housing, informed by the 2019 Joint Housing Land Availability Study. However, paragraph 6.3 of the Background Paper specifically states that the 'roll over' sites will need to be "supported by robust evidence on delivery, phasing, infrastructure requirements and viability" to both inform and support the respective site allocations. In response to the comments, therefore, these sites will indeed be assessed with other strategic site options. This information will be available at Deposit Stage."		
At 3.97 the Council adds:		
"The Council will need to have a high degree of confidence that each allocated site has a realistic prospect of being delivered within the LDP period, including whether the site promoter has a serious intention of developing the site. In order to inform the Deposit Plan, a Candidate Site Assessment process will be undertaken, which will gather suitable evidence to robustly demonstrate the viability and		
deliverability of each site. Viability assessments will therefore need to be		



undertaken based on anticipated costs, values and site specific issues (i.e. abnormal costs) whilst also identifying the contribution sites can make to the delivery of infrastructure, affordable housing and other policy requirements. Site promoters will be expected to submit viability information as part of this assessment process and failure to do so may result in the site being discounted from the Deposit Plan"		
The provision of detailed viability information on key sites in the development plan is an express requirement of the Development Plans Manual3. At paragraph 3.52 it states:		
"To support delivery of the plan, site specific testing in the form of a viability appraisal should be undertaken for sites which are key to delivering the plan, demonstrating that they are deliverable in principle This would be best undertaken as early as possible, ideally at the candidate site stage, but no later than deposit (LDP Regulation 17) stage. This will enable key statutory consultees to provide a meaningful contribution to the plan making process."		
This is reiterated at paragraph 5.89:		
"To support delivery of the plan, site specific viability appraisals should be undertaken for those sites which are key to delivering the plan (the size threshold can vary between LPAs). An appraisal will enable more detailed information to be taken into account having regard to the site-specific details."		
It adds:		
"For the development plan high level testing is required to give certainty that the plan and policies can be delivered in principle, taking into account affordable housing targets, infrastructure and other policy requirements. For those sites key to delivering the plan's strategy they will need		



to demonstrate they can be delivered through the consideration of more detailed costs, constraints and site specific requirements."		
It also advocates that "The preferred approach is for this to be done in conjunction with a site promoter who has access to the detail, or conversely through more detailed modelling with site specific assumptions. Much more insight can be gained which can result in refined affordable housing targets, as opposed to the broader area identified in the high level appraisal."		
While the Deposit Plan is supported by a high-level viability appraisal4, contrary to the national guidance and the Council's own commitments, this does not provide site specific information about the viability of the Porthcawl Waterfront site (or indeed any roll-over site). The high-level assessment consequently has no regard to the exceptional costs of the waterfront site development, such as the ground conditions, highway infrastructure, rerouting of services and the substantial Section 106 obligations.		
Moreover, since the Preferred Strategy and Candidate Site stages, the extent of the Porthcawl Waterfront site has been extended, inexplicably, to include the Glamorgan Holiday Hotel (GHH) owned by the representor and 3 Welsh Government (2020) Development Plans Manual, Edition 3 4 BCBC (2021) Plan-Wide Viability Assessment 2021 the subject of an ongoing planning application for 52 apartments. There has been no engagement with the landowner about including this within this allocation.		
The representor acknowledges and accepts the key role that the GHH site can play in the waterfront regeneration. However, its allocation without notice has raised some fundamental concerns. Firstly, as a live application, this site is capable of being brought forward quickly, making a valuable		



and prompt contribution to housing supply. It would be unreasonable at this stage to delay this delivery by embroiling it within the obvious complexities that delivery of the core part of the PLA1 allocation has brought. In particular, it is unreasonable for the representor, having committed to a planning application at this site, to be required to comply with a masterplan the form, content and timescale of which is unknown and upon which they have not been consulted. The fundamental concern of the representor however relates to viability of the PLA1 allocation.

The landowner of the GHH has undertaken its own viability assessment in support of a planning application which demonstrates that the site's exceptional costs mean that no affordable housing can be sustained viably. Inexplicably, the Council will not allow that assessment to be independently reviewed by an independent assessor. The evidence shows nevertheless that in respect of this part of the allocation site at least, the viability assumptions of Policy PLA1 in respect of its ability to support Section 106 contributions and a 30% affordable housing level are plainly unrealistic. In the context of the historic evidence, the lack of site-specific evidence of viability and the evidence put forward by the representor in respect of the proposals at the GHH, it rather appears to the representor that the continued allocation of the waterfront without a real grasp of its viability rather meets Einstein's definition of insanity; that is, doing the same thing over and over and expecting different results.

The representor is of the view that the Council has failed to demonstrate, contrary to published guidance, its own commitments and available evidence, that the allocation as drafted, particularly with the levels of affordable housing and the Section 106 commitments identified is viable. As such the policy fails the test of soundness.



The representor therefore seeks: 1. The redrawing of the PLA boundary to exclude the GHH; 2. The detail of policy PLA1 to be the subject of detailed viability appraisal as is required by guidance and to which the Council has previously committed to.

## **Placemaking Principles**

The representor's comments on placemaking principles are confined to the detail in the supporting text of Policy PLA1.

This refers to the "Porthcawl Waterfront Land-use Framework and Placemaking Strategy" developed by the Council, but this is not provided in the plan or appendices and it is unclear what this document is. A plan entitled Porthcawl Waterfront Regeneration was provided as an Appendix to the Council's Cabinet on 15th September 2020 and appears the most likely candidate, but this does not reflect the extents of the proposed allocation PLA1, notably in respect of the GHH site, nor does it identify that site as one that is anticipated to be subject to compulsory purchase.

The GHH site is the subject of an ongoing planning application the principles of which have been accepted save for discussion concerning the viability of affordable housing. It appears therefore unnecessary and unreasonable at this stage to include this site within placemaking plans that have yet to be formulated or consulted upon. The representor therefore seeks the exclusion of the GHH from the PLA1 allocation and/or the exclusion of the GHH site from the masterplan requirements. Before being 'rolled forward' into the Deposit Plan, Porthcawl Waterfront was subject to robust re-assessment of its sustainability, deliverability and viability credentials in the same manner as all other candidate sites. There has been a substantial change in circumstances to demonstrate the site can be delivered over the Replacement LDP period, as indicated within the housing trajectory. The Council has now purchased and has total control over Phase 1 (Salt Lake), coastal defence works are progressing on site and are due to be completed by the end of 2022. Partnership options are currently being explored in order to bring forward development, initial work has commenced in relation to procurement mechanisms and a formal procurement exercise is scheduled to commence shortly. Phase 2 (Sandy Bay / Coney Beach) is being jointly promoted by the Council and a private owner and a significant majority of the site is not reliant on coastal defence works to come forward. A land-owners agreement is in place, a disposal strategy is being finalised and the site is likely to be brought to the market shortly. With Phase 1 and Phase 2 now running in parallel, there is now no reason why both phases will be unable to progress and come forward together, as further evidenced by the extensive supporting deliverability evidence. As such, the concern raised over the proposed allocation of Porthcawl Waterfront Regeneration Site is both unsubstantiated and not supported.

As documented in the Candidate Site Assessment, the Porthcawl Waterfront site promoter (Bridgend County Borough Council) has robustly demonstrated delivery in accordance with the requirements set out in the Development Plans Manual. A detailed plethora of evidence has been provided to the Council to support its delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. The related housing trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting. As such, the concern raised over proposed allocation of Porthcawl Waterfront Regeneration Site is both unsubstantiated and not supported.

It is acknowledged that there has been no engagement with the landowner regarding the inclusion of the Glamorgan Holiday Hotel (GHH) within PLA1 allocation. The Porthcawl Land-Use Framework (LUF) was prepared by the Council to assist with the proposed re-allocation of the Porthcawl Waterfront Site. Within this document the Glamorgan Holiday Hotel (GHH) was identified as a potential regeneration opportunity site. Since the completion of the LUF the Council has commissioned ASL to prepare a Placemaking Strategy (PMS) for the Waterfront Site to add a finer grain of detail to the development proposals. The Porthcawl PMS does not include the Glamorgan Holiday Hotel (GHH) site, therefore the representors request for the PLA1 site boundary to exclude the Glamorgan Holiday Hotel (GHH) is agreed.

Comments noted.