

**VOLUME 16**

**DEVELOPER AND LANDOWNERS  
CONSULTATION RESPONSES**

**Title:** Do you have any comments to make on the key issues and drivers, vision and objectives of the Deposit Replacement Local Development Plan?

ID	Comment	Summary of changes being sought/proposed	Council response
82	<p>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.</p> <p>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</p>	<p>Over-reliance on the Porthcawl Regeneration Site and a proposal to allocate 312.C1 to enhance flexibility</p>	<p>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.</p> <p>The coastal setting of this site makes it particularly important to consider the impacts of climate change on tidal flood risk as the majority of the site is susceptible to tidal flooding. The draft of the forthcoming revised TAN15 acknowledges that there are some large urban communities already located in areas at risk of flooding and investment in flood defence infrastructure will be required to keep such existing populations safe. Following dialogue with Welsh Government, Coastal Risk Management Programme funding was secured for major flood defence works at Porthcawl. Phase 1 (Eastern Promenade) is designed to protect the Salt Lake area and existing development to the north. Phase 2 (Coney Beach) encompasses flood and coastal erosion measures along the Coney Beach frontage to safeguard and enhance the existing flood protection to the frontage provided by the existing ad-hoc revetment. Implementation of these works will better protect the existing community from flooding and the effects of flooding. However, they also have significant potential to achieve wider social, economic and environmental benefits to contribute towards the statutory well-being goals of the Well-being of Future Generations (Wales) Act 2015. The greatest overall value can be achieved by combining these investments in flood defence infrastructure with other investment in active travel infrastructure, public realm improvements and regeneration-led development.</p> <p>The existing flood defences combined with completion of the new flood defence works has rendered the site a Defended Zone and will provide a coincidental opportunity to realise wider regeneration and placemaking benefits for the area through the delivery of Porthcawl Waterfront. On this basis, it is considered that the Porthcawl Waterfront site can be developed in full compliance with the requirements of the future revised TAN15. The defences are expected to provide a high standard of protection; significantly reducing the risk of flooding in areas within Zone 3 and respective areas in Zone 2. Nevertheless, all development in the area will necessarily be accompanied by a Flood Consequence Assessment to ensure the new development incorporates resilience to remain dry and safe as per the tolerable conditions set out in the future revised TAN15. The Replacement LDP's housing trajectory has factored in appropriate timescales for the completion of coastal flood defence works before forecasting dwelling completions. This presents a practical example of how to deliver a high priority brownfield regeneration scheme in a Defended Zone in the context of the forthcoming revised TAN15.</p> <p>As documented within the Strategic Growth Options Background Paper, a range of growth scenarios were analysed and subsequently refreshed to determine the most appropriate level of growth to deliver the Replacement LDP's Vision, Key Issues, Aims and Objectives. The Deposit Plan has been underpinned by a balanced level of economic growth and housing provision, based on well informed, evidence based judgements regarding need, demand and supply factors (refer to 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.</p>

	to play in supporting employment growth and the Cardiff Capital City Region Deal.		
136 6	<p>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).</p> <p>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).</p>	<p>No changes being proposed.</p> <p>Representor supports the key issues, drivers, vision and objectives, along with the robust supporting evidence base.</p>	Comments noted.
488	<p>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.</p>	<p>Concerns regarding Strategic Allocation PLA3: West of Bridgend</p>	<p>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.</p> <p>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. 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</p>

			<p>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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, kenfig Hill and North Cornelly.</p> <p>The plan preparation has involved the assessment of 171 sites, the vast majority of which are greenfield. 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including masterplan development principles and development requirements (See Deposit Policy PLA3 – Page 71), all of which seek to contribute and address the identified key issues and drivers identified through the Replacement LDP preparation process. This will be facilitated through the provision of affordable housing, on-site education provision, public open space and active travel provision.</p> <p>In terms of biodiversity/ecology, an ecological desk study and Extended Phase 1 survey has been undertaken by EDP. The desk study has noted that within the Study Site's zone of influence there are a number of statutorily and non-statutory designated sites present, most notably Laleston Meadows SINC which overlaps with the site itself.</p> <p>Given the combination of designated sites, it is concluded that any future planning submission will need to consider the potential for direct and indirect impacts to arise upon qualifying features, including the Laleston Meadows SINC. However, it is inherent within the emerging masterplan that the Laleston Meadows SINC and its associated designated features will be retained. Furthermore, such retained features will be further protected from potential harm, damage and disturbance through the sensitive design of built development away from SINC boundaries and inclusion of suitable buffers.</p> <p>The desk study confirms that the inclusion of Laleston Meadows SINC within the Study's Site boundary will provide substantial potential for a balanced provision of areas of informal public open space and wildlife zones. When linked with proposed POS and play areas across the developable site this will provide a significant benefit to both visual and recreational amenity, conservation and biodiversity enhancement. In respect of the latter, the SINC provides a potential space to accommodate ecological mitigation and biodiversity enhancements and thus offset ecological impacts that may arise during the development of adjacent land.</p> <p>An Extended Phase 1 survey was undertaken in February 2020, supplemented by further roosting bat works in March 2020. 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. Habitats of greatest ecological importance 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 roosting bats surveys</p>
--	--	--	--

			<p>identified several trees with low to high potential to support a bat roost whilst onsite ponds have been considered for their potential to support great crested newt.</p> <p>The results of the desk study and Extended Phase 1 survey have influenced the masterplan which has sought to locate development across those habitats of predominantly limited ecological value whilst retaining boundary habitats as far as possible. Where retained, such features have been accommodated within proposed informal green space and sustainable transport links, which ultimately enhances connectivity throughout the Site and contributes to the wider green infrastructure resource.</p> <p>Where avoidance is not possible, however, and will result in the loss of internal field boundaries (albeit predominantly species-poor or defunct), the site is considered to be of sufficient size and extent to enable future development proposals to flexibly avoid and/or mitigate for any significant ecological constraints and compensate where necessary. This will be in addition to the sensitive positioning of built development away from retained boundary features to minimise damage.</p> <p>The report also highlights further detailed habitat and species surveys which are recommended to inform a planning application and ensure proposed mitigation is appropriate and proportional. These include a Dormouse survey, which was raised in comments received from NRW. Policy PLA3 will require the development to retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland) and Laleston Meadows SINC, which includes the green space bordering the northern and north-western boundaries of the site. PLA3 will also require the developer to submit and agree ecological management plans including proposals for mitigation, enhancement and maintenance for retained habitats and protected species (including for bats and dormouse) and provide appropriate compensatory and replacement habitat.</p> <p>Policy PLA3 will require development to incorporate the Laleston Trail within the central part of the site, providing access to the Bridgend Circular Walk and realigned Public Right of Way. Additionally, PLA3 requires 4.1 hectares of retained green infrastructure and new areas of public open space across the site comprising seven key areas of formal open space (including 0.5ha of 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.</p> <p>In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p> <p>The proposed allocation is supported by detailed masterplanning work, including an illustrative block plan to identify a realistic dwelling yield on the site's net developable area. The Transport Assessment reflects the number of dwellings the site is expected to deliver. This identifies the various transport issues relating to the proposed development, and, in combination with the Strategic Transport Assessment, what measures will be taken to deal with the anticipated transport impacts of the scheme. Proposed Policy PLA3 prescribes the appropriate development requirements in relation to all forms of travel. The density and mix of uses proposed is considered appropriate to support a diverse community and vibrant public realm, whilst generating a critical mass of people to support services such as public transport, local shops and schools. In accordance with national planning policy, higher densities should be encouraged in urban centres and near major public transport nodes or interchanges. Given the site's location within the Primary Key Settlement of the County Borough and the proximity to Bridgend Town Centre, this density level is therefore considered appropriate to foster sustainable communities, further bolstered by the proposed enhancements to the active travel network.</p>
--	--	--	--

			<p>The Replacement LDP aims to reduce private car reliance and help the County Borough achieve the principles set out by the Active Travel (Wales) Act 2013, with the ultimate aim of improving and expanding upon the current active travel routes as identified in the Existing Route Maps. Consideration of active travel has been key during the master planning of strategic sites in the County Borough. Reference to the Active Routes detailed in Policy PLA3 in conjunction with Policy PLA12 should be considered essential in the delivery of any strategic site or any proposal, ensuring that development is contributing to the promotion of a sustainable and healthy lifestyle.</p> <p>The Active Travel Network Maps aim to improve access to key services and facilities including town centres, employment sites, retail areas and transport hubs, improved access to education facilities such as schools and colleges and improvements to, and expansion of, the existing strategic cycle network in the County Borough. Opportunities will be maximised to further improve upon these routes, providing walking connections which will allow integration between new developments and existing communities.</p> <p>Whilst developments should be encouraged in locations which reduce the need to travel and promote the use of sustainable transport, the Council recognises that any development growth will likely result in greater travel demand, and that increased traffic levels and congestion is likely to occur if appropriate mitigating transport measures and infrastructure are not delivered. Therefore a Strategic Transport Assessment (See Appendix 36) has been undertaken to consider the impact of plan proposals and help guide and inform the process of delivering land allocations by means of modelling and quantifying the transport impact of these proposals. The technical notes accompanying this assessment demonstrate that the proposed level of development detailed within the LDP can be accommodated within the BCBC Highway Network with suitable mitigation.</p> <p>Furthermore Strategic Policy 5: Sustainable Transport and Accessibility will ensure that development must be located and designed in a way that minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, education, local services and community facilities. Development will be required to deliver, or contribute towards the provision of, active travel scheme, public transport measures, road infrastructure, and other transport measures, in accordance with the Bridgend Local Transport Plan and the Bridgend Integrated Network Plan (See Appendix 29).</p> <p>Proposed Policy PLA3 prescribes a number of placemaking principles for Land West of Bridgend, which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. Such requirements include pursuing 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. There will be a clear emphasis on providing safe pedestrian and cycling linkages along the A473, with Bryntirion Comprehensive School and Bridgend Town Centre (including the bus station and train station). New routes should be provided to accord with the proposed routes within the Council's Active Travel Network Maps: INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58 and BRC9b. PLA3 will also require development to provide a new shared cycle / footway on the northern side of the A473, connecting the site with active travel route INM-BR-57 linking to the shops at Bryntirion to the east, and a widened footway to the west of the site to provide a connection to the eastbound bus stop on the A473.</p> <p>Policy PLA3 will require on-site highway improvements to ensure the principal point of vehicular access is achieved from a new signalised junction with the A473 at the southern boundary; the junction will accommodate a new-shared use crossing to connect the internal cycleway/footway with the existing active route BRC9b on the southern side of the A473.</p> <p>The site promoter's Transport Assessment confirms that the traffic effect of 850 dwellings is forecast to be in the order of 269 and 243two-way movements in the AM and PM peak hours respectively, although this is considered</p>
--	--	--	--

			<p>worst case as attitudinal change towards travel progresses. This quantum of trips equates to just over 4 vehicles per minute two-way, diluted across the local highway network. 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. Working from home and from a third-place such as a non-site Workhub will be encouraged from the outset, in line with Welsh Government's aspirations.</p>
516	<p>A strategic objective of a democratic 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.</p>	<p>A strategic objective of a democratic government is not to 'create' or 'protect' - but to respond to wishes of the electorate</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>It is the view of the Council that the overall objectives of the Community Involvement Scheme (CIS) as originally set out in with the approved Delivery Agreement, including the CIS have been met. It is also considered that the LDP has been prepared in accordance with the LDP 'Preparation Requirements' set out in the Development Plans Manual (Edition 3).</p> <p>The Council previously consulted the public on the Preferred Strategy of which was held from 30th September to 8th November 2019. Following the public consultation period the Council was required to consider all representations made in accordance with LDP Regulation 16(2) before determining the content of the deposit LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 – Preferred Strategy &amp; Initial Consultation Report) for publishing. This report was subsequently signed off by members of Council.</p> <p>As part of Stage 4 of the Delivery Agreement, the Council was required to undertake Deposit public consultation for a statutory period of 6 weeks, however the Council made an allowance for 8 weeks in order to maximise public participation. This was to ensure a range of views could be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. A number of consultation methods were used to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods included:</p> <ul style="list-style-type: none"> <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 Bridgend County Borough Council's Website (<a href="http://www.bridgend.gov.uk/ldpconsultation">www.bridgend.gov.uk/ldpconsultation</a>). Respondents were able to complete an electronic survey online to make a formal representation.</li> <li>• Printed reference copies were placed within public facing Council buildings, including every library in the County Borough (fixed and mobile), subject to social distancing guidelines. The reference copies were also available to view at the Council's Civic Offices in Angel Street, Bridgend, although by appointment only as the offices had not re-opened to the public due to the pandemic. Hard copies of the survey form were also been made available at these locations for members of the public to complete by hand.</li> <li>• Dissemination of hard copies of information to individuals. Members of the public were able request a copy of the survey by post to complete by hand (free of charge). There was a £25 charge for a hard copy of the whole Deposit Plan to cover printing and postage costs for such a large document.</li> <li>• Every individual and organisation on the LDP Consultation Database was notified by letter or email (depending on their preference) to inform them of the availability of the Deposit Consultation. 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.</li> </ul>

			<ul style="list-style-type: none"> <li>• Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in Bridgend County Borough.</li> <li>• 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.</li> <li>• Planning Officers have presented the consultation remotely to established working groups, including the 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 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 <a href="mailto:ldp@bridgend.gov.uk">ldp@bridgend.gov.uk</a> or telephoning 01656 643633.</li> </ul> <p>Posters were sent to all Town and Community Councils to display on their notice boards.</p>
707	<p>Yes. To the 'average Joe' the jargon used to describe the 'Key Issues, drivers, vision and objectives, are about as complicated and meaningless as they could have been made - providing very limited or no clarity to the General Public. Information provided by Dr Jamie Wallis MP provides much clearer and simplified descriptions of what is planned - especially for Porthcawl. Based on what Dr. Wallis writes - 1115 new houses, a school, a supermarket, other shops and 'leisure' opportunities - it appears that Porthcawl's position as a premium seaside tourist attraction is coming to a nasty end. One can easily surmise that all of this construction will cover every open space that presently exists in Porthcawl. Presuming that there's every chance that 1115 new homes may house - at a minimum - 2xcar families it means 2000+ parking spaces will be needed. Inevitably this will lead to Porthcawl seafront becoming a rabbit warren of an housing estate with all parking facilities for tourists/day trippers being eliminated. Naturally, the residents of the new properties will expect to park their vehicles near to their homes and BCBC will no doubt provide them with 'Resident only' parking. Any tourists will be forced to look for parking in other side streets and that will lead to more 'resident only' parking areas. During any day with reasonable weather tourists flock to the town, often leading to a queue of cars going back out toward the M4. With all parking areas given over to 'residents only' the tourists will go elsewhere. Aberavon could get a boom off this plan. Reading the SOBJ's one could be forgiven for wondering how 'high quality</p>	<p>Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront / consultation</p>	<p>Comments noted. In terms of the consultation, 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. The Local Development Plan has to be written in a particular style to meet the guidance set out in the LDP regulations manual.</p> <p>It is the view of the Council that the overall objectives of the Community Involvement Scheme (CIS) as originally set out in with the approved Delivery Agreement, including the CIS have been met. It is also considered that the LDP has been prepared in accordance with the LDP 'Preparation Requirements' set out in the Development Plans Manual (Edition 3).</p> <p>The Council previously consulted the public on the Preferred Strategy of which was held from 30th September to 8th November 2019. Following the public consultation period the Council was required to consider all representations made in accordance with LDP Regulation 16(2) before determining the content of the deposit LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 – Preferred Strategy &amp; Initial Consultation Report) for publishing. This report was subsequently signed off by members of Council.</p> <p>As part of Stage 4 of the Delivery Agreement, the Council was required to undertake Deposit public consultation for a statutory period of 6 weeks, however the Council made an allowance for 8 weeks in order to maximise public participation. This was to ensure a range of views could be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. A number of consultation methods were used to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods included:</p> <ul style="list-style-type: none"> <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 Bridgend County Borough Council's Website (<a href="http://www.bridgend.gov.uk/ldpconsultation">www.bridgend.gov.uk/ldpconsultation</a>). Respondents were able to complete an electronic survey online to make a formal representation.</li> <li>• Printed reference copies were placed within public facing Council buildings, including every library in the County Borough (fixed and mobile), subject to social distancing guidelines. The reference copies were also available to view at the Council's Civic Offices in Angel Street, Bridgend, although by appointment only as the offices had not re-opened to the public due to the pandemic. Hard copies of the survey form were also been made available at these locations for members of the public to complete by hand.</li> <li>• Dissemination of hard copies of information to individuals. Members of the public were able request a copy of the survey by post to complete by hand (free of charge). There was a £25 charge for a hard copy of the whole Deposit Plan to cover printing and postage costs for such a large document.</li> <li>• Every individual and organisation on the LDP Consultation Database was notified by letter or email (depending on their preference) to inform them of the availability of the Deposit Consultation.</li> </ul>



<p>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.</p>		<p>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.</p> <ul style="list-style-type: none"> <li>• Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in Bridgend County Borough.</li> <li>• 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.</li> <li>• Planning Officers have presented the consultation remotely to established working groups, including the 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 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.</li> <li>• Posters were sent to all Town and Community Councils to display on their notice boards.</li> </ul> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>
--	--	--

			<p>deliverability, sustainability and suitability. Proceeding this detailed assessment, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>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 PLA1 – Page 63). The provision of new residential units, including affordable dwellings, will enable the delivery of other vital regeneration requirements comprising flood defences, public open space, leisure, enhanced active travel links plus education, retail and community facility provision.</p> <p>A Placemaking Strategy has been developed and produced of which provides the framework to deliver the broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical development of the waterfront in this manner will improve the attractiveness of the town as a place to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader settlement of Porthcawl to thrive and prosper.</p> <p>In terms of Salt Lake, development will include a new food store, residential (including affordable housing), supporting commercial uses and leisure. With regards to leisure, an area north of the harbour within Salt Lake will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but also act, with others, to set a quality benchmark which will also need to be achieved elsewhere.</p> <p>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 encouraged. This mix of uses will help bring life and vitality during the day and into the evening.</p> <p>In terms of open space, Policy PLA1 requires development of Porthcawl Waterfront to incorporate Green Infrastructure and Outdoor Recreation Facilities of which are to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p> <p>Additionally, there are plans for creating new facilities at Cosy Corner, including community facilities whilst also creating employment opportunities. The plans for Cosy Corner include an all-new stone and glass-clad building which will feature new premises suitable for retail and start-up enterprises. The council also wants to create new meeting space for community use, a parade square for the Sea Cadets and an office for the harbour master as well as changing facilities for users of the nearby marina. If funding allows, plans are in place that will further enhance the scheme with new landscaping, public seating, a children's play area and a canopy structure capable of providing comfortable outdoor shelter from rain and the sun.</p> <p>Strategic Policy 16: Tourism and supporting development management policies will promote tourism development. The LDP will also provide the framework for the provision and protection of well-located, good quality, tourism, sport, recreation and leisure facilities and to diversify tourism in the County including Porthcawl, thereby contributing to the Aims and Priorities of the Bridgend County Destination Management Plan (2018-2022) (See Appendix 30).</p>
--	--	--	--

			<p>In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car par enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p> <p>Residential parking will be draw on good practice advice set out in 'Manual for streets' and 'Manual for Streets 2', in addition to Supplementary Planning Guidance 17: Parking Standards. The overall approach to residential parking is one which recognises that not all parking spaces need to be allocated to individual properties. Unallocated parking provides a shared resource which caters for variations in demand. Therefore, this strategy promotes the use of unallocated parking for a large proportion of the parking supply. Due to the high demand for spaces by tourists, unallocated parking should be designed in such a way as to deter its usage for tourism parking and should therefore mainly be off-street.</p> <p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans.</p> <p>As with all large scale regeneration sites there are a range of key pieces of infrastructure that will need to be delivered in order to unlock the development potential of this brownfield site. In addition to the key infrastructure required to facilitate the development, the regeneration area provides an opportunity to co locate other strategic infrastructure that would mutually benefit both the proposed development and the existing town. They key enabling infrastructure required to facilitate the proposed development of Porthcawl Waterfront includes the following key requirements:</p> <ul style="list-style-type: none"><li>• Coastal defence improvements;</li><li>• New public open space;</li><li>• Drainage infrastructure;</li><li>• New road and roundabout;</li><li>• Active travel improvements;</li><li>• Education provision; and</li><li>• Utility connections and upgrades</li></ul> <p>In terms of health the Council has been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations within the Deposit Plan progress. However, the Health Board is confident that it has identified the additional pressures created by the Local Development plans and that its own estates and sustainability plans articulate the action required to respond to this.</p>
--	--	--	--

779	<p>I understand that the development around 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 points detailed above, I think it would really invigorate the area and create a place both locals and tourists could enjoy.</p>	<p>Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront</p>	<p>Comments noted. A Placemaking Strategy has been developed and produced of which provides the framework to deliver the broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical development of the waterfront in this manner will improve the attractiveness of the town as a place to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader settlement of Porthcawl to thrive and prosper.</p> <p>The seafront will also be clearly defined by the introduction of a potential recreational route along Sandy Bay that links through to east and also links seamlessly with the Eastern Promenade. Commercial units be considered on the ground floor of residential development fronting the Eastern Promenade, if there is market demand for such uses. Ancillary commercial units will also be considered along the potential recreational route along Sandy Bay. In these locations retail uses, restaurants and cafes will be particularly encouraged.</p> <p>In terms of the proposed housing on Sandy Bay, the design philosophy ensures that development will be higher (and therefore denser) closer to the seafront (particularly toward the west) with lower/less dense development toward the middle, northern and eastern peripheries of the site.</p> <p>The Council have also commissioned consultants to undertake a Landscape/Seascape and Visual Appraisal of the proposed regeneration. The appraisal assesses the proposed land use, storey height and density parameters. The assessment concludes that the development would not have an adverse impact on the Landscape/Seascape of Porthcawl, subject to appropriate design responses being incorporated at detailed design stage. The assessment recognises that the development offers to impose a dramatic and positive change across an extensive area, replacing areas of dereliction with new or enhanced accessible open spaces and high-quality buildings and facilities. Further detailed assessments and considerations will be undertaken, in order to influence the design of the development, including a detailed landscape and visual assessment that will assist in identifying detailed mitigation of adverse effects.</p> <p>In terms of open space, Policy PLA1 requires development of Porthcawl Waterfront to incorporate Green Infrastructure and Outdoor Recreation Facilities of which are to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p> <p>In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car par enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p> <p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans.</p>
-----	---	---	--

847	YES	No changes proposed	Comments noted. A lack of information has been provided in order to provide a response.
996	SOBJ4 - how does building housing enhance natural spaces?	How does building housing enhance natural spaces?	<p>Comments noted. The Deposit Plan has been underpinned by 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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>The Strategy acknowledges that the County Borough has a rich and varied biodiversity with a broad range of species, habitats and unique, rich landscapes. Policies within the Deposit Plan have been refreshed and updated from the existing LDP and will continue to protect the county borough’s environment in line with national planning policy and the Environment Act 2016.</p> <p>In terms of allocated Strategic Development Sites, Policies PLA1-PLA5 detail the site specific requirements including masterplan development principles and development requirements. Such requirements will ensure that sites retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland), and SINC’s. Additionally, green infrastructure and outdoor recreation facilities will be required</p>

			to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing 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	<p>Comments noted. The Deposit Plan has been underpinned by 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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, kenfig Hill and North Cornelly.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>Policy PLA1-5 (See Deposit Plan – Page 62) detail the site-specific requirements for the mixed-use Strategic Development Sites in Regeneration Growth Areas and Sustainable Growth Areas. Such development will deliver a wide range of land uses including affordable housing, education, recreation facilities, public open space, active travel plus appropriate community facilities and commercial uses. Delivery of these Strategic Sites will prove fundamental in achieving the Replacement LDP’s Vision and Objectives for the County Borough.</p> <p>Additional long-term brownfield Regeneration Sites are also proposed for allocation (See Policy COM1(R1-R3)), located within parts of the County Borough that will benefit the most and also those that exhibit opportunities to deliver the greatest positive impacts of such growth. However, as referenced in Planning Policy Wales, the</p>

			housing land supply will not be dependent on these additional long-term Regeneration Sites, as they require longer lead-in times, preparatory remediation-based enabling works and more detailed strategies to enable their 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.	<p>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.</p> <p>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. 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. 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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>The plan preparation has involved the assessment of 171 sites, the vast majority of which are greenfield. 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including a range of placemaking principles and masterplan development principles (See Deposit Policy PLA3 – Page 71). The proposed allocation will be required to provide 4.1 hectares of retained green infrastructure and new areas of public open space as well as exploring the provision of enabling sensitive public access to part of Laleston Meadows SINC and woodland. The proposed allocation will also be required to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.</p>
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 appropriate scale of economic growth and housing provision, all of which have been based upon well informed, evidence based judgements

	<p>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.</p>	<p>green space and impact on the natural environment.</p>	<p>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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>The plan preparation has involved the assessment of 171 sites, the vast majority of which are greenfield. 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including a range of placemaking principles and masterplan development principles (See Deposit Policy PLA3 – Page 71). The proposed allocation will be required to provide 4.1 hectares of retained green infrastructure and new areas of public open space as well as exploring the provision of enabling sensitive public access to part of Laleston Meadows SINC and woodland. The proposed allocation will also be required to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.</p>
223	<p>Llanmoor agree that the key issues and 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</p>	<p>References to the evidence base should be updated where applicable since the Preferred</p>	<p>Comments noted. A log of changes will be published when the Plan is finalised.</p>



	<p>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).</p> <p>A main observation with the evidence used, is that the references should be amended where the evidence base has been updated since the Preferred Strategy (PS) consultation.</p> <p>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.</p> <p>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).</p>	Strategy (PS) consultation.	
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 with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations within the Deposit Plan progress.
720	Agree	Support	Comments noted.
722	Agree	Support	Comments noted.
254	<p>Issues and Drivers</p> <p>We welcome the recognition in 'NR1' that Bridgend acts as a hub for services, employment, housing and retail developments. We also support the recognition in 'NR2' that Bridgend acts as a major service centre, which should continue</p>	<p>Support for Issues and Drivers, Vision, and Objectives</p> <p>LDP needs flexibility to attract new uses to Town Centre</p>	<p>Comments noted.</p> <p>Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve.</p> <p>As part of the technical supporting evidence base the Council has prepared a Retail Study (See Appendix 16) which sets out evidence-based recommendations on retail need, the distribution of need and the definition of primary shopping areas to inform policies and site allocations. Additionally, the Council has also undertaken a</p>

<p>to perform a greater sub-regional role as an employment and service centre.</p> <p>'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.</p> <p>Vision</p> <p>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.</p> <p>Objectives</p> <p>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.</p> <p>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.</p> <p>'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 leisure uses, together with other complementary uses. This should include new residential development within appropriate centres (in particular Bridgend Town Centre).</p>		<p>sense check of the evidence base in light of the Coronavirus pandemic (See Appendix 51 – Background Paper 11: Covid-19 Policy Review). The 2019 Retail Study already identified a shift in commuter spending habits and online shopping, which the pandemic has accelerated. The LDP recognises that high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.</p> <p>The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have been reviewed against the existing distribution of uses and likely future requirements. In Bridgend and Maesteg, the Primary Shopping Areas have been condensed to create a consolidated retail core. Additional Secondary Shopping Areas have been identified on the proposals map for Bridgend, Maesteg and Porthcawl to create greater flexibility and promote the potential for a wider range of uses.</p> <p>The demand/supply for larger convenience retailing is likely to be less sensitive to the impacts of the pandemic. However, use of sequential tests alongside careful management of out-of-centre locations will remain key to avoid promotion of unsustainable travel patterns.</p> <p>The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.</p>
--	--	--

400	<p>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).</p> <p>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</p>	<p>No changes proposed – support allocation of Land South East of Pont Rhyd-y-cyff (COM 1(3)).</p>	<p>Comments noted</p>
554	<p>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</p>	<p>No changes proposed</p>	<p>Comments noted</p>
287	<p>Support - please see covering letter submitted</p>	<p>No changes proposed – support</p>	<p>Comments noted</p>
308	<p>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).</p>	<p>No changes being proposed.</p> <p>Representor supports the key issues, drivers, vision and objectives, along with the robust supporting evidence base.</p>	<p>Comments noted.</p>

	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 Background Paper, a range of growth scenarios were analysed and subsequently refreshed to determine the most appropriate level of growth to deliver the Replacement LDP's Vision, Key Issues, Aims and Objectives. The Deposit Plan has been underpinned by a balanced level of economic growth and housing provision, based on well informed, evidence-based judgements regarding need, demand and supply factors (refer to 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.
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	<p>This comment is not supported. As documented within the Strategic Growth Options Background Paper, a range of growth scenarios were analysed and subsequently refreshed to determine the most appropriate level of growth to deliver the Replacement LDP's Vision, Key Issues, Aims and Objectives. The Deposit Plan has been underpinned by a balanced level of economic growth and housing provision, based on well informed, evidence-based judgements regarding need, demand and supply factors. 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.</p> <p>It is factually inaccurate to state that, "the plan lack (<i>sic</i>) aspiration and is looking to deliver the minimum requirement in terms of meeting National Policy". The level of household growth proposed in the Deposit LDP is 33% higher than Welsh Government's 2018 based principal projection. This degree of aspiration aligns with Bridgend being within a National Growth Area as defined by Future Wales, which was confirmed by Welsh Government in response to the Deposit Plan Consultation. This level of growth will also enhance Bridgend's position as a highly sustainable and accessible destination that benefits both the County Borough and the wider regions.</p>
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 inform the Deposit Plan are detailed within Table 1 of the Written Statement. The final selection of proposed allocations is detailed within the Candidate Site Assessment.

	<p>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, 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, employment, housing and retail 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.</p>	<p>Pyle, Kenfig Hill and North Cornelly as a Main Settlement and Sustainable Growth Area.</p>	
221	<p>Persimmon Homes West Wales support the objective SOBJ1 (To Create High Quality Places) as far it recognises the importance of Bridgend as the Primary Key Settlement 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.</p>	<p>Support the objective SOBJ1 (To Create High Quality Places)</p>	<p>Comments noted.</p>

	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 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 and 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. Refer to the Housing Trajectory Background Paper. As such, the objection is not supported.
1390	Lodgeground Ltd (Dovey Estates) support the vision and objectives.	None	Comments noted.
407	N/A	No changes proposed	Comments noted.
425	<p>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."</p> <p>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."</p> <p>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</p>	<p>Objection: the Plan does not adequately seek to resolve the junction capacity issues at Junction 36 of the M4 and therefore is inappropriate (failing Test of Soundness 2).</p>	<p>In considering the representation, the Local Plan Representation (document reference 194943/N02) prepared by Vectos (July 2021) has been reviewed (hereon referred to as "Transport Representation").</p> <p>Firstly, it must be noted that in considering the highway implications of land west of Tondu Road, Bridgend (Candidate Site Ref: 286.C2 - hereon referred to as 'Site 286.C2') reference was made to a variety of highway and transportation studies, as discussed in LDP Transportation Background Paper 8 'M4 Junction 36', which should be read in conjunction with this response.</p> <p>The concerns raised relate to the signalised 'dumbbell' roundabout junction at M4 J36, which is managed by Welsh Government, not Bridgend County Borough Council. The junction configuration is therefore influenced by the requirement to protect the strategic function of the M4 trunk road motorway.</p> <p>As detailed in LDP Transportation Background Paper 'M4 Junction 36', this junction currently experiences congestion and delay and therefore, if the local highway network is not carefully managed, there is potential for these problems to intensify to the extent that, not only will the junction itself be a significant issue for the movement of people <u>via all modes</u> throughout Bridgend County Borough Council, but also on a strategic level with the possibility of queues reaching back to the M4 which will have economic and environmental consequences. The likelihood of a Welsh Government development control objection on any site which has a material adverse impact on J36 is high.</p> <p>All major candidate site promoters were requested to provide a detailed Transport Assessment to demonstrate that the anticipated impact of the proposal on the highway network would not have adverse implications on highway safety or operation. However, no Transport Assessment was submitted for Site 286.C2.</p> <p>Based on the Transport Representation, it is understood that access to Site 286.C2 is likely to be from the A4063. Reference to LDP Transportation Background Paper 8 'M4 Junction 36' shows that 2011 Census data for workplace inflows and outflows has the highest proportion of movements associated with Rhondda Cynon Taf, Cardiff and Neath Port Talbot. Online journey planning tools for Site 286.C2 demonstrates that the vast majority of these trips to and from the site would route through Junction 36 to utilise the M4 eastbound or westbound, or the A4093 into Rhondda Cynon Taf.</p>

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 'Is 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 WeITAG 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/Tondu Road roundabout	Roundabout	-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	Roundabout	-24%	-19%

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

STA Reference	Junction Description	Junction Type	Degree of Saturation AM	Degree of Saturation PM
10	A473 Tondu Road/Angel Street/Park Street	Signalised junction	188.9%	194.6%
16	A473/B4622/Bright Hill	Signalised 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

			<p>AQMA on Park Street. This will be to the detriment of active travel users, public transport users, residents, and businesses in the area.</p> <p>The submitted Transport Representation produced by Vectos states in paragraph 76 that junction modelling for 1,000 dwellings has been undertaken for the access design. However, no outputs are provided to confirm the assessment assumptions with regards to traffic forecasts, design year, distributions, modal split or junction parameters. Furthermore, there are no accompanying design drawings available to review whether the proposed access location is likely to be able to meet design standards.</p> <p>The submitted Transport Representation implies that the site is well suited to encourage sustainable forms of transport, however there are no accompanying active travel route audits to substantiate this.</p> <p>In the absent of suitable evidence from the 'Site 286.C' submission, the conclusion remains that the site will amplify existing highway capacity issues to an extent that will make conditions worse for active travel, public transport users and other road users through increased traffic at sensitive junctions within the network. Without dedicated infrastructure to prioritise sustainable forms of travel, this additional development traffic induced delay at key locations in the county borough's network would have a direct negative impact on existing and prospective pedestrians, cyclists and public transport users, who will be subject to increased traffic volumes and delay.</p>
--	--	--	--

Title: Do you have any comments to make on the growth strategy?			
ID	Comment	Summary of changes being sought/proposed	Council response
82	<p>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,</p>	<p>General support of the growth strategy and housing requirement (as a minimum).</p>	<p>Comments noted (refer to Strategy Growth Options Background Paper)</p>



	<p>economically active households to expand within or move into and the Cardiff Capital City Region Deal.</p> <p>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 overreliance 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.</p>	<p>Concerns over overreliance on strategic sites</p>	<p>All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs. This process provides a high degree of confidence that the sites included within the Deposit Plan are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.</p> <p>Moreover, 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.</p> <p>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.</p> <p>As such, the proposal to include Candidate Site 312.C1 is not supported and is also contrary to the Spatial Strategy. The total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement, taking into account the potential for non-delivery and unforeseen issues in accordance with the Development Plans Manual.</p>
<p>136 6</p>	<p>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.</p> <p>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</p>	<p>Supports growth strategy, proposes as re-ordering the growth areas within SP1.</p>	<p>As detailed within the Spatial Options Background Paper, the Spatial Strategy seeks to continue to provide a land use framework that helps realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033. Regeneration Growth Areas appear before Sustainable Growth Areas within SP1 to clearly highlight a necessary degree of continuity with the first adopted LDP. The undeveloped brownfield regeneration allocations identified in the existing LDP are proposed to be retained and supplemented with sustainable urban growth in settlements that demonstrate strong employment, service and transportation functions. This approach is essential to implement the long term regeneration strategy embodied within the Replacement LDP Vision. As such, the proposal to re-order the growth areas within SP1 is not supported.</p>

	<p>previously set out in the PS consultation document.</p> <p>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'.</p> <p>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.</p>	<p>Proposal to re-word SP1 to make the dwelling provision (inclusive of the flexibility allowance) a minimum in order to deliver the housing requirement.</p> <p>No proposed changes. Supports allocation of Land West of Bridgend as a means of delivering the growth strategy.</p>	<p>The rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper and the support for the Growth Strategy is noted. 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. As such, the proposal to set the total dwelling provision (inclusive of the flexibility allowance) as a minimum to deliver the dwelling requirement is not supported. The total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement. The flexibility allowance itself is not the minimum requirement, it has been set to ensure there is sufficient flexibility above the housing requirement to account for non-delivery and unforeseen issues in accordance with the Development Plans Manual.</p> <p>Comments noted.</p>
488	<p>This will impact on public services, shops, doctors, schools and hospitals.</p>	<p>Concerns regarding infrastructure</p>	<p>Comments noted. The Council has been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment (See Appendix 13: Candidate Sites Assessment Report (2020)), the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of healthcare services, close working relationships will continue and be maintained with Cwm Taf</p>

			<p>Morgannwg University Health Board. This will be key to service provision planning as site allocations with the Deposit Plan progress.</p> <p>Additionally, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p>
516	<p>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 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.</p>	<p>Concerns regarding the plan and strategy</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned by 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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>In terms of retail, Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve.</p> <p>As part of the technical supporting evidence base the Council have prepared a Retail Study (See Appendix 16) of which sets out evidence-based recommendations on retail need, the distribution of need and the definition of primary shopping areas to inform policies and site allocations. Additionally, the Council have also undertaken a</p>

			<p>sense check of the evidence base in light of the pandemic (See Appendix 51 – Background Paper 11: Covid-19 Policy Review). The 2019 Retail Study already identified a shift in commuter spending habits and online shopping, which the pandemic has accelerated. The LDP recognises that high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.</p> <p>The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have been reviewed against the existing distribution of uses and likely future requirements. In Bridgend and Maesteg, the Primary Shopping Areas have been condensed to create a consolidated retail core. Additional Secondary Shopping Areas have been identified on the proposals map for Bridgend, Maesteg and Porthcawl to create greater flexibility and promote the potential for a wider range of uses.</p> <p>The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.</p>
707	<p>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 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. 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?</p>	<p>Concerns regarding employment</p>	<p>Comments noted. The Deposit Plan has been underpinned by 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.</p> <p>Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p> <p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p> <p>Whilst it is beyond the scope of the LDP to guarantee that employers will come to the area, Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward.</p>

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	<p>Comments noted. A Placemaking Strategy has been developed and produced of which provides the framework to deliver the broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical development of the waterfront in this manner will improve the attractiveness of the town as a place to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader settlement of Porthcawl to thrive and prosper.</p> <p>Policy PLA1 will ensure that development incorporates an appropriate mix of dwelling sizes and types to meet local housing needs, including 30% affordable housing units to be integrated throughout the development.</p> <p>In terms of Salt Lake, development will include a new food store, residential (including affordable housing), supporting commercial uses and leisure. With regards to leisure, an area north of the harbour within Salt Lake will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but also act, with others, to set a quality benchmark which will also need to be achieved elsewhere.</p> <p>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 encouraged. This mix of uses will help bring life and vitality during the day and into the evening.</p> <p>Sandy Bay will accommodate public open space, residential, education provision and commercial. In terms of open space, Policy PLA1 requires development of Porthcawl Waterfront to incorporate Green Infrastructure and Outdoor Recreation Facilities of which are to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p> <p>Additionally, there are plans for creating new facilities at Cosy Corner, including community facilities whilst also creating employment opportunities. The plans for Cosy Corner include an all-new stone and glass-clad building which will feature new premises suitable for retail and start-up enterprises. The council also wants to create new meeting space for community use, a parade square for the Sea Cadets and an office for the harbour master as well as changing facilities for users of the nearby marina. If funding allows, plans are in place that will further enhance the scheme with new landscaping, public seating, a children's play area and a canopy structure capable of providing comfortable outdoor shelter from rain and the sun.</p> <p>In terms of employment, the imbalance and shortage of employment land in Porthcawl is acknowledged compared with other settlements within the County Borough, although it is likely that the majority of employment in the town will continue to be provided through planned growth in the commercial, leisure and tourism sectors.</p>
847	NO	No changes proposed	Comments noted.
996	Building housing on prime locations will not attract a younger population as they are unlikely to be able to afford such properties.	Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront / affordability	Comments noted. 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

			<p>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.</p> <p>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.</p> <p>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.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>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 PLA1 – Page 63). The provision of new residential units, including affordable dwellings, will enable the delivery of other vital regeneration requirements comprising flood defences, public open space, leisure, enhanced active travel links plus education, retail and community facility provision.</p> <p>Policy PLA1 will ensure that development incorporates an appropriate mix of dwelling sizes and types to meet local housing needs, including 30% affordable housing units to be integrated throughout the development.</p>
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	<p>Comments noted. The Deposit Plan has been underpinned by 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.</p> <p>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</p>

			<p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly. As such, the Replacement LDP Strategy does not identify Nantymoel as a location for strategic growth.</p> <p>However, an Urban Capacity Study (UCS) (See Appendix 39) has been prepared of which provides analysis of the potential urban capacity of the County Borough's settlements for housing to evidence the expected small and windfall site allowance rate. The UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this particular component of the housing supply. It serves as a useful resource to developers who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP.</p>
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.	<p>In terms of employment opportunities, over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p> <p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p>
108 5	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.	<p>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.</p>

			<p>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. 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. 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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>The plan preparation has involved the assessment of 171 sites, the vast majority of which are greenfield. 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including a range of placemaking principles and masterplan development principles (See Deposit Policy PLA3 – Page 71). The proposed allocation will be required to provide 4.1 hectares of retained green infrastructure and new areas of public open space as well as exploring the provision of enabling sensitive public access to part of Laleston Meadows SINC and woodland. The proposed allocation will also be required to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.</p>
223	<p>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.</p> <p>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</p>	<p>Support growth strategy, proposes re-ordering the growth areas within SP1.</p> <p>Proposal to re-word SP1 to make the dwelling provision (inclusive of the flexibility allowance) a minimum in order</p>	<p>As detailed within the Spatial Options Background Paper, the Spatial Strategy seeks to continue to provide a land use framework that helps realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033. Regeneration Growth Areas appear before Sustainable Growth Areas within SP1 to clearly highlight a necessary degree of continuity with the first adopted LDP. The undeveloped brownfield regeneration allocations identified in the existing LDP are proposed to be retained and supplemented with sustainable urban growth in settlements that demonstrate strong employment, service and transportation functions. This approach is essential to implement the long-term regeneration strategy embodied within the Replacement LDP Vision. As such, the proposal to re-order the growth areas within SP1 is not supported.</p> <p>The rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper and the support for the Growth Strategy is noted. 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</p>



	<p>in previous policy SF1: Settlement Hierarchy and Urban Management. This was previously done in the PS consultation document.</p> <p>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'.</p> <p>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.</p>	<p>to deliver the housing requirement.</p> <p>Supports allocation of Land West of Bridgend as a means of delivering the growth strategy.</p>	<p>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. As such, the proposal to set the total dwelling provision (inclusive of the flexibility allowance) as a minimum to deliver the dwelling requirement is not supported. The total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement. The flexibility allowance itself is not the minimum requirement, it has been set to ensure there is sufficient flexibility above the housing requirement to account for non-delivery and unforeseen issues in accordance with the Development Plans Manual.</p>
610	<p>Yes unless you're planning to provide an extra GP surgery and employ more nurses and GP's then the community will suffer</p>	<p>Concerns regarding provision of GP Surgeries</p>	<p>In relation to the provision of additional GP surgeries, the Council has been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible</p>

			allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations within the Deposit Plan progress.
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	<p>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.</p> <p>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.</p>	No changes – attractive and diverse centres can help achieve growth strategy	<p>Comments noted.</p> <p>In recognising that Town, District and Local Centres are moving away from their traditional retail roles, Policy SP12, and its supporting policies, seeks to ensure they become the focus of a wider variety of services and facilities. The ‘Town Centre First’ approach is key to enabling such centres to increasingly become multi-functional places and community focal points, thereby rendering them more viable as go-to destinations. This will complement efforts to regenerate retail and commercial centres through the creation of more outside space, the re-use of underutilised areas, the start-up of remote co-working hubs, and the focus of more accessible public services.</p> <p>An Urban Capacity Study (UCS) (See Appendix 39) has been prepared in support of the Replacement LDP, which provides an analysis of the potential urban capacity of the County Borough’s settlements for housing to evidence the expected small and windfall site allowance rate. The UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this particular component of the housing supply. It serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP. The evidence contained within the UCS identifies the level of capacity across the County Borough’s settlements in both numeric and spatial terms, summarised in Table 10. Many of the sites and sources of urban capacity identified in the Study are located in town and commercial centres, and together with the greater flexibility introduced into the Retail and Town Centre policies of the Replacement LDP, demonstrate scope to accommodate more residential development within these areas.</p>
400	<p>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</p>	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.

	<p>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.”</p> <p>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.</p>		
287	<p>Support - please see covering letter submitted</p> <p>We are instructed, on behalf of our client 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.</p> <p>Background</p> <p>Regulation 18 of the Local Development Plan Regulations requires that, a person may make representations on deposit proposals of Local Development Plan within</p>	<p>No Changes proposed – support growth strategy</p>	<p>Comments noted</p>

<p>the period of 6 weeks on the day on which the LPA publishes the Deposit Plan.</p> <p>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.</p> <p>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.</p> <p>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.</p>		
--	--	--

308	<p>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.</p> <p>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.</p> <p>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'.</p>	<p>Supports growth strategy, proposes as re-ordering the growth areas within SP1.</p> <p>Proposal to re-word SP1 to make the dwelling provision (inclusive of the flexibility allowance) a minimum in order to deliver the housing requirement.</p>	<p>As detailed within the Spatial Options Background Paper, the Spatial Strategy seeks to continue to provide a land use framework that helps realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033. Regeneration Growth Areas appear before Sustainable Growth Areas within SP1 to clearly highlight a necessary degree of continuity with the first adopted LDP. The undeveloped brownfield regeneration allocations identified in the existing LDP are proposed to be retained and supplemented with sustainable urban growth in settlements that demonstrate strong employment, service and transportation functions. This approach is essential to implement the long-term regeneration strategy embodied within the Replacement LDP Vision. As such, the proposal to re-order the growth areas within SP1 is not supported.</p> <p>The rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper and the support for the Growth Strategy is noted. 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. As such, the proposal to set the total dwelling provision (inclusive of the flexibility allowance) as a minimum to deliver the dwelling requirement is not supported. The total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement. The flexibility allowance itself is not the minimum requirement, it has been set to ensure there is sufficient flexibility above the housing requirement to account for non-delivery and unforeseen issues in accordance with the Development Plans Manual.</p>
-----	--	---	---

	<p>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.</p>	<p>No proposed changes. Supports allocation of Land West of Bridgend as a means of delivering the growth strategy.</p>	<p>Comments noted.</p>
<p>400</p>	<p>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,</p>	<p>None – support the Growth Strategy, Spatial Strategy and allocation of Land South East of Pont Rhyd-y-cyff (COM 1(3)).</p>	<p>Comments noted (Refer to Growth Options Background Paper, Spatial Strategy Options Background Paper, Housing Trajectory Background Paper and Candidate Site Assessment).</p>

	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.		
1051	The landowners 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. 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 reasonable however it should be considered a minimum figure.	None – support the Growth Strategy and Spatial Strategy	Comments noted (Refer to Growth Options Background Paper and Spatial Strategy Options Background Paper).

	<p>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.</p>	<p>Proposal to re-word SP1 to make the dwelling provision (inclusive of the flexibility allowance) a minimum in order to deliver the housing requirement</p>	<p>The rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper and the support for the Growth Strategy is noted. 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. As such, the proposal to set the total dwelling provision (inclusive of the flexibility allowance) as a minimum to deliver the dwelling requirement is not supported. The total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement. The flexibility allowance itself is not the minimum requirement, it has been set to ensure there is sufficient flexibility above the housing requirement to account for non-delivery and unforeseen issues in accordance with the Development Plans Manual.</p>
253	<p>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.</p>	<p>General support of the growth strategy and housing requirement (as a minimum).</p>	<p>Comments noted (refer to Strategy Growth Options Background Paper).</p>
170	<p>The mid-level growth option lacks aspiration and proposes a growth level only 45 units above the average over the</p>	<p>Concern the growth strategy 'lacks aspiration'</p>	<p>The rationale behind the Growth Strategy is clearly documented within the Strategic Growth Options Background Paper and Employment Background Paper. These papers support and draw upon the evidence within the</p>



	<p>current plan period and 64 units below the highest rate of build achieved in the plan period. The desire of the plan to attract 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.</p>		<p>Demographic Analysis and Forecasts Report (2019), Demographics Update Addendum (2020), Economic Evidence Base Study (2019) and Economic Evidence Base Update (2021).</p> <p>The Council agrees with part of the representor’s statement, “creating jobs without the new homes will only result in increased travel movement in and out of the borough”. Hence, the Replacement LDP evidence base has evaluated a comprehensive range of growth options and analysed the link between different levels of population change and the size and profile of the resultant resident labour force. This has ensured development of a Growth Strategy that is most appropriate to achieve an equilibrium between the number of economically active people remaining within and moving into the County Borough plus the number of employers relocating and/or expanding within the same vicinity. However, the Council disagrees with the representor’s statement that the growth option “lacks aspiration” in terms of past build rates.</p> <p>The detailed evaluation within the Strategic Growth Options Background Paper justifies the chosen Growth Strategy 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. It is considered optimal to deliver economic growth, enable the delivery of key infrastructure, secure affordable housing and improve connectivity without resulting in over-development. The analysis also demonstrates that the Growth Option is realistic and deliverable when benchmarked against past delivery rates, whilst also being robustly grounded in post-recession demographic and migration trends. Indeed, whilst it is important to understand past delivery rates and the contextual circumstances that influenced them, the evidence-based work underpinning delivery of the Growth Strategy provides certainty that this scale of growth is achievable. The annual average dwelling completion rate has been 450 dwellings over the entirety of the existing LDP period. Underpinning the Replacement LDP with a dwelling requirement of 505 dpa therefore represents a realistic and sustainable upturn in average dwelling completion rates compared to that witnessed during the existing LDP period. However, as demonstrated throughout the Strategic Growth Options Background Paper, the Replacement LDP’s evidence base has not simply relied on past build rates as the sole evidence base to quantify future employment and housing land requirements. A rich and detailed evidence base has been developed and evaluated to identify the scale of new jobs and homes necessary to deliver the Vision, Aims and Objectives.</p>
1165	<p><u>The unmet requirement for affordable housing</u></p> <p>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 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</p>	<p>Allocate Candidate Site 87.C1 - Land of Penprysg Road, Pencoed as a means of boosting affordable housing supply.</p>	<p>The LHMA 2021 drew upon a range of socioeconomic, demographic and property market data in order to provide detailed insights into the mechanics of the local housing markets in accordance with Welsh Government Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenure mix and house types) to be calculated and extrapolated over the Replacement LDP period. The LHMA is a core piece of baseline evidence that has influenced the scale, type and location of growth within the Replacement LDP. However, and contrary to the representor’s statement, it is inaccurate to claim that the need for affordable housing has “increased” since the 2019/20 LHMA, as each LHMA represents a snapshot at a point in time in accordance with Welsh Government Guidance.</p> <p>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 the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). The Plan’s contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents 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 a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the level of housing need within the County Borough, which the Council will seek to address through a range of market interventions as far as practically deliverable. These complementary sources of supply include, although are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social</p>

<p>assessment period, based on the assumption that the existing backlog will be cleared during these five years. A further annual need of 288 affordable units has also been identified for the remaining 10 years of the LDP period. In comparison with the 2019/20 Local Housing Market Assessment which identified a need of 411 affordable units per annum over the next five years, this is an increase in the overall affordable housing need for the County Borough. 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 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</p>		<p>Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.</p> <p>As also detailed within the Affordable Housing Background Paper, the Replacement LDP will seek to deliver the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. Promotion of significant levels of development in the countryside (affordable housing or otherwise) is not considered conducive to sustainable placemaking and will only be permitted in limited, exceptional circumstances to meet a pressing housing need. 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, 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 purposely small in scale and exceptional in circumstance.</p> <p>The proposal to allocate Land of Penprysg Road, Pencoed (87.C1) as a means of boosting affordable housing supply is therefore not supported. The Candidate Site Assessment clearly states, "the candidate site is located on the periphery of Pencoed, which is identified as Sustainable Growth Area (as defined by SP1). There are highway issues associated with the site in addition to 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".</p>
--	--	--

	of Penprysg Road, Pencoed is a perfect candidate to provide a quantum of housing, in a shorter trajectory than 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.
	<p>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 conducive to logical expansion through delivery of under-utilised sites within their functional area / on their periphery.</p> <p>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</p>	<p>Supports the Settlement Hierarchy, Proposes as re-ordering the growth areas within SP1.</p> <p>Propose allocating Land at Heol Fach, North Cornelly (Candidate Site 222.C1)</p>	<p>As detailed within the Spatial Options Background Paper, the Spatial Strategy seeks to continue to provide a land use framework that helps realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033. Regeneration Growth Areas appear before Sustainable Growth Areas within SP1 to clearly highlight a necessary degree of continuity with the first adopted LDP. The undeveloped brownfield regeneration allocations identified in the existing LDP are proposed to be retained and supplemented with sustainable urban growth in settlements that demonstrate strong employment, service and transportation functions. This approach is essential to implement the long-term regeneration strategy embodied within the Replacement LDP Vision. As such, the proposal to re-order the growth areas within SP1 is not supported.</p> <p>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 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. As such this site is allocated for residential development in the Replacement LDP”. 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.</p>

	<p>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.</p>		
273	<p><u>The Preferred Strategy Approach to Housing Delivery</u></p> <p>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.</p> <p><u>Deposit BRLDP Approach to Housing Delivery Summary of the Approach</u></p>	<p>No changes being sought.</p> <p>No changes being sought.</p>	<p>Comments noted.</p> <p>Comments noted.</p>

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.

Comments on the Approach – Large Strategic Sites

Many of the housing allocations within the emerging LDP, both strategic and non-strategic 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 'over-reliance' on strategic sites and proposal to re-apportion 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 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 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, medium 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 infrastructure 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 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 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.

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.

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



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.

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

(UCS, 2020) was published alongside the Deposit Plan to provide further analysis of the potential urban capacity of the County Boroughs' settlements for housing to evidence the expected small and windfall site allowance rate. This UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this particular component of housing supply. It therefore demonstrates (in addition to past trends) that the small and windfall site allowance rate utilised in the Replacement LDP is both realistic and deliverable. It also serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP. The representor's concerns are therefore unsubstantiated and not supported. Moreover, the housing trajectory will be reviewed as the plan progresses and as part of the monitoring framework of the Replacement LDP. Refer to the Housing Trajectory Background Paper and UCS.

Concern there are inconsistencies between Table 6 and PLA5

Table 6 is not intended to match PLA5 and, as such, the representor's statement is factually inaccurate. Table 6 documents the total housing provision by Settlement, akin to the total documented in Table 7. This includes the contribution identified from the Land East of Pyle site as referenced in PLA5 along with all other housing supply components as clearly stated in supporting paragraph 4.3.50. This will continue to be updated in accordance with the housing trajectory as the plan progresses.

<p>encourage transit orientated development.”</p> <p>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).</p> <p>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.</p> <p><u>Recommendation</u></p> <p>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.</p> <p>Such an approach was supported but has not materialised within the Deposit Plan where a much greater emphasis has been</p>	<p>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</p> <p>Concern that the Deposit Plan is over dependent on strategic sites</p>	<p>The components of housing supply for Pyle, Kenfig Hill and North Cornelly are detailed within Table 7. Whilst the majority of growth in the Replacement LDP period is indeed proposed for allocation on Land East of Pyle, 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 demonstrate site deliverability, 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. All landowners are committed to working towards ensuring a development site that can be delivered as a comprehensive development.</p> <p>Whilst the representor has stated “a selection of smaller or medium sites that could deliver on the housing numbers much quicker than a large strategic site like this”, no supporting evidence has been provided to corroborate this statement or indeed demonstrate that a collective number of sites could deliver the same level of supporting infrastructure as Land East of Pyle. Therefore, this proposal is not supported. 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.</p> <p>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</p>
---	---	---

	<p>placed on the larger strategic sites, along with only a small selection of medium sized sites.</p> <p>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.</p> <p>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.</p> <p>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.</p>		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>The proposal to re-apportion growth away from the proposed strategic sites and to place a greater reliance on a mix of small, medium 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 infrastructure 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..</p>
221	<p><u>Plan Period</u> Persimmon Homes West Wales raise concern regarding the Plan Period, noting</p>	<p>Proposal to alter the plan period to 15 to 20 years</p>	<p>Proposal not supported. The Replacement LDP uses a conventional 15-year plan period and is being prepared in accordance with the Replacement Delivery Agreement. The sites proposed for allocation, and the</p>

<p>that if adopted in the March / April 2022 as 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.</p> <p>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.</p> <p>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.</p> <p><u>Phasing of Housing Numbers / Delivery Timeframes</u></p> <p>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 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</p>	<p>from the point of adoption and allocate additional sites.</p> <p>Proposal to revisit and request further supporting evidence to verify the housing trajectory, make this available for public scrutiny prior to the submission of the Deposit Plan for examination and allocate additional developer-led residential sites.</p>	<p>accompanying justification, is provided in the Candidate Site Assessment Report. The delivery timescales are clearly documented in the Housing Trajectory Background Paper.</p> <p>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.</p> <p>Whilst the representor cites potential delays with larger strategic sites, 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 Replacement LDP 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.</p> <p>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%</p>
--	--	---

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 dwellingsIn 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 27<sup>th</sup> 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 front-loading 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 Council-owned 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 house-builders 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 large-scale 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:

- 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;
- 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 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-allocation (Parc Afon Ewenni and Porthcawl Waterfront) within the Replacement LDP, both of which were considered deliverable components of housing supply to enable delivery of the housing requirement. Before being 'rolled forward' into the Deposit Plan, both sites were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. In the case of Porthcawl Waterfront, there has been a substantial change in circumstances to demonstrate the sites can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment).

For Parc Afon Ewenni, 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.

For 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

	<p>(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).</p>		<p>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.</p> <p>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 Porthcawl Waterfront are not supported.</p> <p>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,</p> <p>"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".</p> <p>Whilst the Council notes the representor's objection to this conclusion, the proposal is not supported for the reasons outlined.</p>
345	<p>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</p>	<p>Concerns raised regarding forthcoming housing supply due to past delivery trends and because the flexibility allowance "may be insufficient"</p>	<p>The detailed evaluation within the Strategic Growth Options Background Paper justifies the chosen Growth Strategy 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. It is considered optimal to deliver economic growth, enable the delivery of key infrastructure, secure affordable housing and improve connectivity without resulting in over-development. The analysis also demonstrates that the Growth Option is realistic and deliverable when benchmarked against past delivery rates, whilst also being robustly grounded in post-recession demographic and migration trends. Indeed, whilst it is important to understand past delivery rates and the contextual circumstances that influenced them, the evidence-based work underpinning delivery of the Growth Strategy provides certainty that this scale of growth is achievable. On average, the annual average completion rate has been 450 dwellings over the whole existing LDP period. Underpinning the Replacement LDP with a dwelling requirement of 505 dpa therefore represents a realistic and sustainable upturn in average dwelling completion rates compared to that witnessed during the existing LDP period. However, as demonstrated throughout the Strategic Growth Options Background Paper, the Replacement LDP's evidence base has not simply relied on past build rates as the sole evidence base to quantify future employment and housing land requirements. A rich and detailed evidence base has been developed and evaluated to identify the scale of new jobs and homes necessary to deliver the Vision, Aims and Objectives.</p>

	<p>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 and windfall sites.</p> <p>The RLDP housing 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.</p>		<p>All housing supply components that will deliver the housing requirement (completions to date, land bank commitments with planning permission, the large and small windfall site allowance and new housing allocations) are detailed in the Housing Trajectory Background Paper.</p> <p>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. 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.</p> <p>An Urban Capacity Study (UCS, 2020) was also published alongside the Deposit Plan to provide further analysis of the potential urban capacity of the County Boroughs' settlements for housing to evidence the expected small and windfall site allowance rate. This UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this particular component of housing supply. It therefore demonstrates (in addition to past trends) that the small and windfall site allowance rate utilised in the Replacement LDP is both realistic and deliverable. It also serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP.</p> <p>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.</p> <p>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 total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement.</p> <p>Therefore, the representor's statements that suggest "additional site allocations and windfall sites" are needed within the Replacement LDP and the flexibility allowance "may be insufficient" are considered unsubstantiated and are not supported.</p>
1390	Lodgeground Ltd (Dovey Estates) support the growth strategy.	None	Comments noted.
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% higher than the 2014-based projections which the LDP Preferred Strategy was based upon", although this comment is factually inaccurate.

<p>(based on a Flexibility Allowance), including 1,977 affordable homes. The 10% increase in Flexibility Allowance (bringing the allowance to 20%) is supported not least given that the currently LDP has a record of under delivery against its existing housing requirement. In respect of LDP Reviews, the Welsh Government's Development Plans Manual states at Para 3.83 that "Updates to nationally published data, such as household and population projections may also provide a contextual change which should be taken into account". The housing requirement (of 7,575 homes) is unchanged since that set out in the LDP Preferred Strategy in 2019 – albeit a greater Flexibility Allowance of 20% has now been adopted. Since the Preferred Strategy was issued, Welsh Government have published updated household projections. The 2018-based Household Projections are some 29% higher than the 2014-based projections which the LDP Preferred Strategy was based upon. The housing requirement should be further reviewed and increased to reflect the increased household projections. Based on the current level of growth proposed, this would equate to a housing requirement of 9,772 homes with a flexibility allowance of 1,954 homes providing a housing supply of 11,726 homes. It is considered that the High Growth Option considered at the Preferred Strategy stage should inform the housing requirement – this set out a need (not accounting for flexibility allowance) for the delivery of 681 dwellings per annum and employment growth of +524. This would result in a housing requirement of 10,215 dwellings over the plan period and a housing supply of 12,258 homes (with 20% flexibility allowance). Applying the 29% uplift as a result of the 2018-based household projections would provide a housing requirement of 13,177 homes and a housing supply of 15,813 homes (with 20% flexibility allowance). This higher level of growth is considered more appropriate</p>	<p>9,772 homes with a flexibility allowance of 1,954  and  13,177 homes with a housing supply of 15,813 homes (with 20% flexibility allowance).</p>	<p>As detailed in the Demographic Analysis and Forecasts Report (2019) and Strategic Growth Options Background Paper, a range of 2014-based scenarios and alternatives were initially analysed to inform three growth options (Low, Mid and High) at Preferred Strategy stage. These options were 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. They enabled more detailed analysis into how different levels of growth aligned with the issues the Replacement LDP is seeking to address. Overall, the Mid Growth Option (505 dwellings per annum) was selected to underpin the Preferred Strategy, considered likely to perform best by supporting economic growth, enabling the delivery of key infrastructure, securing affordable housing and improving connectivity without resulting in over-development. At Preferred Strategy stage it was concluded that this Growth Option would deliver against the full range of issues the Replacement LDP is seeking to address and enable realisation of all four Strategic Objectives. Contrary to the representor's deduction, the Mid Growth Option was based on the POPGROUP Short Term Scenario, which projected migration over a six-year historical period (2011/12–2016/17), a time period consistent with ONS methods, updated to include the latest three years of population statistics. This produced a growth option that reflected the most recent, post-recession, trend based data available at Preferred Strategy stage, which captured a positive period of sustainable, economic growth for forward projection.</p> <p>The Mid Growth Option (i.e. 505 dpa) underpinning the Preferred Strategy was considerably higher than the 2014-based principal projection (i.e. 271 dpa) to enable continuation of the positive, sustainable growth witnessed in the years following the Great Recession. Even though the 2018-based principal projection is now higher than the 2014-based baseline, the number of dwellings it would support (i.e. 378 per annum) is still far below the dwelling requirement justified at Preferred Strategy stage. This is an important consideration as it demonstrates that the dwelling requirement under the Mid Growth Option (i.e. 505 dpa) would still enable more positive, yet sustainable economic growth in the County Borough, over and above the revised baseline, in accordance with the Replacement LDP's Aims and Objectives.</p> <p>A range of refreshed growth scenarios were duly considered in the Demographics Update Addendum (2020), including the suite of WG 2018-based population and household projections, alternative trend and housing-led alternatives. These additional scenarios also incorporated the 2019 mid-year estimate, published by ONS in June 2020. The PG-Short Term Variant, which originally underpinned the Mid Growth Option, has also been updated. The refreshed PG-Short Term Scenario uses an ONS 2019 Mid-Year-Estimate base year and calibrates its migration assumptions from a more recent 6-year historical period (2013/14– 2018/19), an approach consistent with ONS methods. This period still captures the more positive socio-economic and demographic trends post the Great Recession and therefore still represents a period of sustainable, economic growth for forward projection. This is consistent with the approach at Preferred Strategy stage, although is based on more recent demographic data. It also pre-dates the shorter-term impacts caused by the pandemic, thereby ensuring the scenario is not grounded in negative, recession-laden trends. Clearly, the revised PG-Short Term Variant still supports the same level of dwelling growth as identified at Preferred Strategy stage. This is explained in detail within the Strategic Growth Options Background Paper.</p> <p>The representor has advocated two different, yet contradictory, dwelling requirements based on an incorrect assumption that the Council has failed to take the latest 2018-based projections into account. In addition, the representor has provided insufficient supporting evidence to justify these alternative growth options. A summary is provided below:</p> <ul style="list-style-type: none"> <li>• Representor Option 1: "The 2018-based Household Projections are some 29% higher than the 2014-based projections which the LDP Preferred Strategy was based upon (<i>sic</i>). The housing requirement should be further reviewed and increased to reflect the increased household projections. Based on the current level of growth proposed, this would equate to a housing requirement of 9,772 homes with a flexibility allowance of 1,954 homes providing a housing supply of 11,726 homes".</li> </ul>
---	---	--

<p>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.</p>		<p>Council response: This proposed dwelling requirement is not considered to have a sound basis as the representor has applied an arbitrary uplift to the housing requirement proposed in the Deposit Plan. In effect, the representor has used a proportionate trend from one demographic scenario and applied it to another. This overly simplistic approach is not based on a robust projection, has not considered the demographic relationship between homes and jobs and has failed to tangibly analyse how such a growth level would align with the issues and objectives the Replacement LDP is seeking to address. This proposal is not supported.</p> <ul style="list-style-type: none"> <li>• Representor Option 2: “It is considered that the High Growth Option considered at the Preferred Strategy stage should inform the housing requirement – this set out a need (not accounting for flexibility allowance) for the delivery of 681 dwellings per annum and employment growth of +524. This would result in a housing requirement of 10,215 dwellings over the plan period and a housing supply of 12,258 homes (with 20% flexibility allowance). Applying the 29% uplift as a result of the 2018-based household projections would provide a housing requirement of 13,177 homes and a housing supply of 15,813 homes (with 20% flexibility allowance)”.</li> </ul> <p>Council response: Despite framing the representation in the context of the 2018-based principal projection, the representor has simultaneously advocated using the ‘High Growth Option’ considered at Preferred Strategy Stage, which was based on more historic migration assumptions projected from a period of significant economic growth (2001/02–2007/08) prior to the Great Recession. The representor has therefore provided a contradictory recommendation this respect. Moreover, the Strategic Growth Options Background Paper has clearly set out the reasons why the High Growth Option was not taken forward. For ease of reference, the Paper concluded that ‘the risk with the High Growth Option is that it may place too much emphasis on outright economic growth and could necessitate allocation of excessive greenfield sites on the periphery of settlements, which could promote car-dependency, place undue pressure on existing infrastructure, encourage out-commuting and necessitate unsustainable patterns of movement. This would be at the expense of more placemaking-led sustainable urban extensions and regeneration schemes. This may render it difficult to balance the four strategic objectives and achieve an equilibrium between economic growth and sustainable development’.</p> <p>The representor has equally applied an arbitrary uplift ‘as a result of the 2018-based household projections’ to the High Growth Option as a basis for a 13,177 dwelling requirement. This is considered a highly simplistic methodology that is not underpinned by a robust projected scenario, rather one that crudely calculates proportionate growth from one scenario and attempts to apply it to another. Moreover, proceeding with a dwelling requirement of this scale would require doubling past annual completions rates and would only serve to further exacerbate the negative consequences of the High Growth Option as already discussed in the Strategic Growth Options Background Paper.</p> <p>The Council considers that the representor has sought to artificially manufacture the highest possible dwelling requirement as justification to include extra housing sites within the Plan, despite these alternative dwelling requirements lacking any sound basis or tangible analysis of how they would achieve the key issues, aims and objectives the Plan is seeking to address.</p> <p>Instead, the Deposit Plan has been underpinned by a balanced level of economic growth and housing provision, based on well informed, evidence based judgements regarding need, demand and supply factors (refer to 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</p>
--	--	--

			<p>housing and employment provision that will achieve sustainable patterns of growth, support existing settlements and maximise viable affordable housing delivery. The level of household growth proposed in the Deposit LDP is actually 33% higher than Welsh Government's 2018 based principal projection. This degree of aspiration aligns with Bridgend being within a National Growth Area as defined by Future Wales, which was confirmed by Welsh Government in response to the Deposit Plan Consultation. This level of growth will also enhance Bridgend's position as a highly sustainable and accessible destination that benefits both the County Borough and the wider regions.</p> <p>The representor's proposals are not supported.</p>
219	<p>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%.</p> <p>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.</p> <p>Support: Policy SP1 is supported but there is a requirement for the Strategic</p>	<p>SP1: No changes being proposed.</p> <p>SF1: No changes be proposed.</p>	<p>Comments of support acknowledged.</p> <p>Comments of support noted.</p>

	Allocations to be included within Pencoed's settlement boundaries.		
407	<p>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.</p> <p><b>Policy SP6: Sustainable Housing Strategy</b></p> <p>This 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 SP1 (Regeneration and Sustainable Growth</p>	<p>SP1: No changes being proposed.</p> <p>SF1: No changes be proposed.</p> <p>SP6: proposed changes to policy wording to ensure consistency.</p>	<p>Comments of support acknowledged.</p> <p>Comments of support noted.</p> <p>As noted by the representor Policy SP6 and supporting paragraphs 4.3.57 and 4.3.58 clearly refer to 'Edge of Settlement Sites'. Therefore, it is not considered necessary to amend Policy COM1 and include additional explanatory text. Policy COM1 is based on Table 17 in Welsh Government's Development Plans Manual.</p>



	<p>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 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 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 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.</p>	<p>SP6: proposed change to policy wording – third bullet point.</p> <p>Policy SF1: proposed change to policy wording</p>	<p>Policy SP6 clearly states that development will be distributed in accordance with Strategic Policy SP1, based on the Sustainable Housing Strategy that includes reference to ‘edge of settlement sites’. Therefore, Policy SP6 is considered appropriate in the current form.</p> <p>The proposed policy wording is considered unnecessary as the proposals map clearly details the proposed changes to the settlement boundaries to accommodate all allocations proposed in the plan.</p>
425	<p>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 (based on a Flexibility Allowance), including 1,977 affordable homes. The 10% increase in Flexibility Allowance (bringing the allowance to 20%) is supported not least given that the currently LDP has a record of under delivery against its existing housing requirement.</p>	<p>Objection to Policy SP1 – the representor suggests that the High Growth option should be considered at Preferred Strategy Stage should inform the</p>	<p>The rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper.</p> <p>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 (based on a Flexibility Allowance), including 1,977 affordable homes. The 10% increase in Flexibility Allowance (bringing the allowance to 20%) is supported not least given that the currently LDP has a record of under delivery against its existing housing requirement. In respect of LDP Reviews, the Welsh Government’s Development Plans Manual states at Para 3.83 that “Updates to nationally published data, such as household and population projections may also provide a contextual change which should be taken into account”. The housing requirement (of 7,575 homes) is unchanged since that set out in the LDP Preferred Strategy in 2019 – albeit a greater Flexibility Allowance of 20% has now been adopted. Since the Preferred Strategy was issued, Welsh Government have published updated household projections.</p>

<p>In respect of LDP Reviews, the Welsh Government's Development Plans Manual states at Para 3.83 that "Updates to nationally published data, such as household and population projections may also provide a contextual change which should be taken into account".</p> <p>The housing requirement (of 7,575 homes) is unchanged since that set out in the LDP Preferred Strategy in 2019 – albeit a greater Flexibility Allowance of 20% has now been adopted. Since the Preferred Strategy was issued, Welsh Government have published updated household projections. The 2018-based Household Projections are some 29% higher than the 2014-based projections which the LDP Preferred Strategy was based upon. The housing requirement should be further reviewed and increased to reflect the increased household projections. Based on the current level of growth proposed, this would equate to a housing requirement of 9,772 homes with a flexibility allowance of 1,954 homes providing a housing supply of 11,726 homes.</p> <p>It is considered that the High Growth Option considered at the Preferred Strategy stage should inform the housing requirement – this set out a need (not accounting for flexibility allowance) for the delivery of 681 dwellings per annum and employment growth of +524. This would result in a housing requirement of 10,215 dwellings over the plan period and a housing supply of 12,258 homes (with 20% flexibility allowance). Applying the 29% uplift as a result of the 2018-based household projections would provide a housing requirement of 13,177 homes and a housing supply of 15,813 homes (with 20% flexibility allowance).</p> <p>This higher level of growth is considered more appropriate 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</p>	<p>housing requirement.</p>	<p>The 2018-based Household Projections are some 29% higher than the 2014-based projections which the LDP Preferred Strategy was based upon. The housing requirement should be further reviewed and increased to reflect the increased household projections. Based on the current level of growth proposed, this would equate to a housing requirement of 9,772 homes with a flexibility allowance of 1,954 homes providing a housing supply of 11,726 homes. It is considered that the High Growth Option considered at the Preferred Strategy stage should inform the housing requirement – this set out a need (not accounting for flexibility allowance) for the delivery of 681 dwellings per annum and employment growth of +524. This would result in a housing requirement of 10,215 dwellings over the plan period and a housing supply of 12,258 homes (with 20% flexibility allowance). Applying the 29% uplift as a result of the 2018-based household projections would provide a housing requirement of 13,177 homes and a housing supply of 15,813 homes (with 20% flexibility allowance). This higher level of growth is considered more appropriate 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.</p> <p>Summary:</p> <p>Increase the dwelling requirement to: 9,772 homes with a flexibility allowance of 1,954 and 13,177 homes with a housing supply of 15,813 homes (with 20% flexibility allowance).</p> <p>Response:</p> <p>The representor has stated, "the 2018-based Household Projections are some 29% higher than the 2014-based projections which the LDP Preferred Strategy was based upon", although this comment is factually inaccurate.</p> <p>As detailed in the Demographic Analysis and Forecasts Report (2019) and Strategic Growth Options Background Paper, a range of 2014-based scenarios and alternatives were initially analysed to inform three growth options (Low, Mid and High) at Preferred Strategy stage. These options were 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. They enabled more detailed analysis into how different levels of growth aligned with the issues the Replacement LDP is seeking to address. Overall, the Mid Growth Option (505 dwellings per annum) was selected to underpin the Preferred Strategy, considered likely to perform best by supporting economic growth, enabling the delivery of key infrastructure, securing affordable housing and improving connectivity without resulting in over-development. At Preferred Strategy stage it was concluded that this Growth Option would deliver against the full range of issues the Replacement LDP is seeking to address and enable realisation of all four Strategic Objectives. Contrary to the representor's deduction, the Mid Growth Option was based on the POPGROUP Short Term Scenario, which projected migration over a six-year historical period (2011/12–2016/17), a time period consistent with ONS methods, updated to include the latest three years of population statistics. This produced a growth option that reflected the most recent, post-recession, trend based data available at Preferred Strategy stage, which captured a positive period of sustainable, economic growth for forward projection.</p> <p>The Mid Growth Option (i.e. 505 dpa) underpinning the Preferred Strategy was considerably higher than the 2014-based principal projection (i.e. 271 dpa) to enable continuation of the positive, sustainable growth witnessed in the years following the Great Recession. Even though the 2018-based principal projection is now higher than the 2014-based baseline, the number of dwellings it would support (i.e. 378 per annum) is still far below the dwelling requirement justified at Preferred Strategy stage. This is an important consideration as it</p>
---	-----------------------------	--

<p>the town's position as part of the Cardiff Capital Region and being within a National Growth Area within Future Wales 2040.</p>		<p>demonstrates that the dwelling requirement under the Mid Growth Option (i.e. 505 dpa) would still enable more positive, yet sustainable economic growth in the County Borough, over and above the revised baseline, in accordance with the Replacement LDP's Aims and Objectives.</p> <p>A range of refreshed growth scenarios were duly considered in the Demographics Update Addendum (2020), including the suite of WG 2018-based population and household projections, alternative trend and housing-led alternatives. These additional scenarios also incorporated the 2019 mid-year estimate, published by ONS in June 2020. The PG-Short Term Variant, which originally underpinned the Mid Growth Option, has also been updated. The refreshed PG-Short Term Scenario uses an ONS 2019 Mid-Year-Estimate base year and calibrates its migration assumptions from a more recent 6-year historical period (2013/14– 2018/19), an approach consistent with ONS methods. This period still captures the more positive socio-economic and demographic trends post the Great Recession and therefore still represents a period of sustainable, economic growth for forward projection. This is consistent with the approach at Preferred Strategy stage, although is based on more recent demographic data. It also pre-dates the shorter-term impacts caused by the pandemic, thereby ensuring the scenario is not grounded in negative, recession-laden trends. Clearly, the revised PG-Short Term Variant still supports the same level of dwelling growth as identified at Preferred Strategy stage. This is explained in detail within the Strategic Growth Options Background Paper.</p> <p>The representor has advocated two different, yet contradictory, dwelling requirements based on an incorrect assumption that the Council has failed to take the latest 2018-based projections into account. In addition, the representor has provided insufficient supporting evidence to justify these alternative growth options. A summary is provided below:</p> <ul style="list-style-type: none"> <li>• Representor Option 1: "The 2018-based Household Projections are some 29% higher than the 2014-based projections which the LDP Preferred Strategy was based upon (sic). The housing requirement should be further reviewed and increased to reflect the increased household projections. Based on the current level of growth proposed, this would equate to a housing requirement of 9,772 homes with a flexibility allowance of 1,954 homes providing a housing supply of 11,726 homes".</li> </ul> <p>Council response: This proposed dwelling requirement is not considered to have a sound basis as the representor has applied an arbitrary uplift to the housing requirement proposed in the Deposit Plan. In effect, the representor has used a proportionate trend from one demographic scenario and applied it to another. This overly simplistic approach is not based on a robust projection, has not considered the demographic relationship between homes and jobs and has failed to tangibly analyse how such a growth level would align with the issues and objectives the Replacement LDP is seeking to address. This proposal is not supported.</p> <ul style="list-style-type: none"> <li>• Representor Option 2: "It is considered that the High Growth Option considered at the Preferred Strategy stage should inform the housing requirement – this set out a need (not accounting for flexibility allowance) for the delivery of 681 dwellings per annum and employment growth of +524. This would result in a housing requirement of 10,215 dwellings over the plan period and a housing supply of 12,258 homes (with 20% flexibility allowance). Applying the 29% uplift as a result of the 2018-based household projections would provide a housing requirement of 13,177 homes and a housing supply of 15,813 homes (with 20% flexibility allowance)".</li> </ul> <p>Council response: Despite framing the representation in the context of the 2018-based principal projection, the representor has simultaneously advocated using the 'High Growth Option' considered at Preferred Strategy Stage, which was based on more historic migration assumptions projected from a period of significant economic growth (2001/02–2007/08) prior to the Great Recession. The representor has therefore provided a contradictory recommendation this respect. Moreover, the Strategic Growth Options Background Paper has clearly set out the reasons why the High Growth Option was not taken forward. For ease of reference, the Paper concluded that 'the risk with the High Growth Option is that it may place too much emphasis on outright economic growth and</p>
--	--	--

			<p>could necessitate allocation of excessive greenfield sites on the periphery of settlements, which could promote car-dependency, place undue pressure on existing infrastructure, encourage out-commuting and necessitate unsustainable patterns of movement. This would be at the expense of more placemaking-led sustainable urban extensions and regeneration schemes. This may render it difficult to balance the four strategic objectives and achieve an equilibrium between economic growth and sustainable development’.</p> <p>The representor has equally applied an arbitrary uplift ‘as a result of the 2018-based household projections’ to the High Growth Option as a basis for a 13,177 dwelling requirement. This is considered a highly simplistic methodology that is not underpinned by a robust projected scenario, rather one that crudely calculates proportionate growth from one scenario and attempts to apply it to another. Moreover, proceeding with a dwelling requirement of this scale would require doubling past annual completions rates and would only serve to further exacerbate the negative consequences of the High Growth Option as already discussed in the Strategic Growth Options Background Paper.</p> <p>The Council considers that the representor has sought to artificially manufacture the highest possible dwelling requirement as justification to include extra housing sites within the Plan, despite these alternative dwelling requirements lacking any sound basis or tangible analysis of how they would achieve the key issues, aims and objectives the Plan is seeking to address.</p> <p>Instead, the Deposit Plan has been underpinned by a balanced level of economic growth and housing provision, based on well informed, evidence based judgements regarding need, demand and supply factors (refer to 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 level of household growth proposed in the Deposit LDP is actually 33% higher than Welsh Government’s 2018 based principal projection. This degree of aspiration aligns with Bridgend being within a National Growth Area as defined by Future Wales, which was confirmed by Welsh Government in response to the Deposit Plan Consultation. This level of growth will also enhance Bridgend’s position as a highly sustainable and accessible destination that benefits both the County Borough and the wider regions.</p> <p>The representor’s proposals are not supported.</p>
5	<p>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.</p>	<p>Support the growth strategy</p>	<p>Comments noted.</p>

Title: Do you have any comments to make on the spatial strategy?

ID	Comment	Summary of changes being sought/proposed	Council response
82	<p>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' (RGA), 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</p>		<p>Porthcawl has been identified as a Regeneration Growth Area. The basis for this strategy is detailed within the Spatial Strategy Background Paper and it is considered the best option to align with the Vision and also the Key Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP is seeking to address. The Strategy is considered most conducive to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales' placemaking principles. It will maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites in accordance with the site search sequence and seek to minimise pressure on BMV agricultural land, subject to site-specific assessment.</p> <p>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.</p> <p>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 Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p> <p>The proposal to include Candidate Site 312.C1 is not supported and is also contrary to the Spatial Strategy. The total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement, taking into account the potential for non-delivery and unforeseen issues in accordance with the Development Plans Manual.</p>

<p>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</p>		
---	--	--

<p>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 ensures 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).</p> <p><b>Other Strategic Sites</b> BDW is concerned that a number of the identified Strategic Sites have environmental constraints. There are also significant infrastructure improvements and works required to facilitate developments which would likely restrict the timing of the delivery of these sites until later in the plan period. It is therefore considered that the Deposit Draft RLDP must allow for some flexibility in the likely event that the proposed strategic sites will not deliver quickly, nor at the quantum anticipated – and that the remedy to this would be to allocate a number of sustainable, edge of</p>	<p>General comment regarding the deliverability of proposed strategic sites and a proposal to allocate 312.C1 to enhance flexibility</p>	<p>All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs. This process provides a high degree of confidence that the sites included within the Deposit Plan are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.</p> <p>Moreover, 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</p>
---	--	---

	<p>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.</p>		<p>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.</p> <p>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.</p> <p>As such, the proposal to include Candidate Site 312.C1 is not supported and is also contrary to the Spatial Strategy. The total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement, taking into account the potential for non-delivery and unforeseen issues in accordance with the Development Plans Manual.</p>
1366	<p>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 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.</p> <p>More specifically, Llanmoor supports the apportionment of sustainable growth at Bridgend as the Primary Key Settlement 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:</p> <p><b>Regeneration Growth Areas</b></p> <ul style="list-style-type: none"> <li>- Maesteg (Main Settlement – Tier 2): 685 units (7%)</li> <li>- Porthcawl (Main Settlement – Tier 2): 1,277 units (14%)</li> </ul> <p><b>Sustainable Growth Areas</b></p> <ul style="list-style-type: none"> <li>- Bridgend (Primary Key Settlement – Tier 1): 4,190 units 46%</li> </ul>	<p>Re-proportioning of strategic growth away from the grouped settlement of 'Pyle, Kenfig Hill and North Cornelly' and towards Bridgend</p>	<p>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 to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables sustainable growth is proposed to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pencoed and with the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly'.</p> <p>Whilst Pyle, Kenfig and North Cornelly was not identified as a growth area in the existing LDP, an alternative spatial strategy is being proposed for the Replacement LDP. The basis for this strategy is detailed within the Spatial Strategy Background Paper and it is considered the best option to align with the Vision and also the Key Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP is seeking to address. The Strategy is considered most conducive to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales' placemaking principles. It will maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites in accordance with the site search sequence and seek to minimise pressure on BMV agricultural land, subject to site-specific assessment.</p> <p>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 (2022)). 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>The level of growth apportioned to Pyle, Kenfig Hill and North Cornelly is unequivocally consistent with the Settlement Hierarchy, Spatial Strategy and LHMA. Moreover, the proposed allocation (Land East of Pyle) is supported with comprehensive, robust technical and viability evidence to demonstrate that the site is both viable and deliverable. This is documented within the Candidate Site Assessment.</p> <p>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</p>



	<p>– Pencoed (Main Settlement – Tier 2): 843 units 9%</p> <p>– Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area (Main Settlement Tier 2) 1,190 units 13%</p> <p><b>Outside Regeneration Growth Areas and Sustainable Growth Areas</b></p> <p>– Valleys Gateway (Main Settlement – Tier 3): 675 units 7%</p> <p>– Local Settlements (Tier 3): 347 units (4%)</p> <p>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.</p>		<p>in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting.</p> <p>For these reasons, the proposal to re-proportion strategic growth away from the grouped settlement of ‘Pyle, Kenfig Hill and North Cornelly’ and towards Bridgend is not supported.</p>
488	<p>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.</p>	<p>Concerns regarding infrastructure</p>	<p>Comments noted. 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 (2022)). 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p> <p>The Council have also been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations with the Deposit Plan progress.</p>

516	<p>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.</p>	<p>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.</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>A such, the Deposit Plan has been underpinned by 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.</p> <p>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. 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.</p> <p>The Replacement LDP apports 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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>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 (2022)). 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>All allocations are shown on the Proposals Map.</p>
707	<p>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 beyond'. Stating that the strategy is to</p>	<p>Concerns relating to employment / Strategic Allocation PLA1:</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p>

<p>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 else - but coal is dead! Those people who are creating these ideas don't seem to understand the the general populace don't need to be told what is needed and where - they already know. What they need is an official body to ACT on getting industry in to the area and let them know if they've achieved anything - not just write about it.. At present, it seems like the only thing that the 'responsible authority' can come up with is 'build more houses' in the hope that jobs and business will follow. That's a pipe dream. As far as Porthcawl is concerned - destroying its attraction as a tourist resort is NOT regeneration. The shopping area is usually very busy on most days and extremely busy when the weather is moderate to fine (unlike Bridgend where the town centre is DEAD). BCBC should be concentrating its efforts on sorting out Bridgend not ruining what is a very successful and classic seaside resort. Experiments with pedestrianisation and changing road systems around Bridgend has made it a ghost town which looks dilapidated and dirty (Swansea City has done the same)... not pleasant to visit - now the gem that is Porthcawl will go the same way. BCBC should heed the American terminology - if it ain't broke don't fix it!</p>	<p>Porthcawl Waterfront</p>	<p>The Deposit Plan has been underpinned by 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.</p> <p>Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p> <p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p> <p>Whilst it is beyond the scope of the LDP to guarantee that employers will come to the area, Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward.</p> <p>The imbalance and shortage of employment land in Porthcawl is acknowledged compared with other settlements within the County Borough, although it is likely that the majority of employment in the town will continue to be provided through planned growth in the commercial, leisure and tourism sectors.</p> <p>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 PLA1 – Page 63). The provision of new residential units, including affordable dwellings, will enable the delivery of other vital regeneration requirements comprising flood defences, public open space, leisure, enhanced active travel links plus education, retail and community facility provision.</p> <p>A Placemaking Strategy has been developed and produced of which provides the framework to deliver the broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical development of the waterfront in this manner will improve the attractiveness of the town as a place to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader settlement of Porthcawl to thrive and prosper.</p>
---	-----------------------------	--

			<p>In terms of Salt Lake, development will include a new food store, residential (including affordable housing), supporting commercial uses and leisure. With regards to leisure, an area north of the harbour within Salt Lake will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but also act, with others, to set a quality benchmark which will also need to be achieved elsewhere.</p> <p>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 encouraged. This mix of uses will help bring life and vitality during the day and into the evening.</p> <p>Sandy Bay will accommodate public open space, residential, education provision and commercial. In terms of open space, Policy PLA1 requires development of Porthcawl Waterfront to incorporate Green Infrastructure and Outdoor Recreation Facilities of which are to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p> <p>Additionally, there are plans for creating new facilities at Cosy Corner, including community facilities whilst also creating employment opportunities. The plans for Cosy Corner include an all-new stone and glass-clad building which will feature new premises suitable for retail and start-up enterprises. The council also wants to create new meeting space for community use, a parade square for the Sea Cadets and an office for the harbour master as well as changing facilities for users of the nearby marina. If funding allows, plans are in place that will further enhance the scheme with new landscaping, public seating, a children's play area and a canopy structure capable of providing comfortable outdoor shelter from rain and the sun.</p>
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 long term sustainable goal.	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	<p>Comments noted. The Spatial Strategy (See Appendix 43 – Background Paper 3) 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.</p> <p>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.</p>
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 determine whether they conformed with the Preferred Strategy and, if so, whether they were deliverable. Sites measuring less than 0.25 hectares (including 329.C1) are too small for individual allocation and were therefore assessed through the Settlement Boundary Review (See Appendix 38). The Council has reviewed all settlement boundaries within the County Borough to determine if they are still appropriate in light of the Replacement LDP Strategy and / or would constitute appropriate amendments to existing boundaries. This included candidate site 329.C1 (rear of Osborne

			Terrace, Nantymoel). As detailed within the Review, the Replacement LDP Strategy does not identify Nantymoel as a location for strategic growth. Candidate site 329.C1 was considered to represent an inappropriate extension to the existing settlement of Nantymoel into the open countryside. Therefore, following the Review, the Deposit Replacement LDP has not proposed altering the defined settlement boundary of Nantymoel to include this site.
108 5	There have been a high number of housing 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 area.	Concerns relating to overdevelopment within the borough and impact of congestion on the conservation area.	<p>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.</p> <p>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. 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. 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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>The plan preparation has involved the assessment of 171 sites, the vast majority of which are greenfield. 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including a range of placemaking principles and masterplan development principles (See Deposit Policy PLA3 – Page 71). Green Infrastructure and Outdoor Recreation Facilities will be required to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance. The proposed allocation will also be required to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.</p>

874	We welcome Strategic Objection 1's aim, to promote Bridgend as the Primary Key Settlement of the County Borough where major employment, commercial and residential development is focused	Support for Spatial Strategy	Comments noted.
223	<p>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 Area (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.</p> <p>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:</p> <p><b>Regeneration Growth Areas</b></p> <ul style="list-style-type: none"> <li>• Maesteg (Main Settlement – Tier 2): 685 units (7%)</li> <li>• Porthcawl (Main Settlement – Tier 2): 1,277 units (14%)</li> </ul> <p><b>Sustainable Growth Areas</b></p> <ul style="list-style-type: none"> <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>	Re-proportion strategic growth away from the grouped settlement of 'Pyle, Kenfig Hill and North Cornelly' and towards Bridgend.	<p>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 to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables sustainable growth is proposed to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pencoed and with the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly'.</p> <p>Whilst Pyle, Kenfig and North Cornelly was not identified as a growth area in the existing LDP, an alternative spatial strategy is being proposed for the Replacement LDP. The basis for this strategy is detailed within the Spatial Strategy Background Paper and it is considered the best option to align with the Vision and also the Key Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP is seeking to address. The Strategy is considered most conducive to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales' placemaking principles. It will maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites in accordance with the site search sequence and seek to minimise pressure on BMV agricultural land, subject to site-specific assessment.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>The level of growth apportioned to Pyle, Kenfig Hill and North Cornelly is unequivocally consistent with the Settlement Hierarchy, Spatial Strategy and LHMA. Moreover, the proposed allocation (Land East of Pyle) is supported with comprehensive, robust technical and viability evidence to demonstrate that the site is both viable and deliverable. This is documented within the Candidate Site Assessment.</p> <p>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.</p> <p>For these reasons, the proposal to re-proportion strategic growth away from the grouped settlement of 'Pyle, Kenfig Hill and North Cornelly' and towards Bridgend is not supported.</p>

	<p><b>Outside Regeneration Growth Areas and Sustainable Growth Areas</b></p> <ul style="list-style-type: none"> <li>• Valleys Gateway (Main Settlement – Tier 3): 675 units 7%</li> <li>• Local Settlements (Tier 3): 347 units (4%)</li> </ul> <p>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.</p>		
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	<p>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.</p> <p>The supporting text (Paragraph 4.3.7) also 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.</p> <p>The recognition of the important role played by Bridgend Town Centre is welcomed.</p>	<p>Support identification of Bridgend as Primary Key Settlement</p> <p>Concern that identification of Primary Shopping Area does not affect ability to attract new uses, previously developed land and/or underutilised sites should be prioritised (including new</p>	<p>Policy ENT6 of the Replacement LDP identifies Southside (incorporating land at the Bridgend Shopping Centre) as a key regeneration site where refurbishment and regeneration proposals will be encouraged incorporating a variety of different complementary uses. The LDP seeks to improve the performance of the Town Centre by enabling measures identified in the Bridgend Town Centre Masterplan (2022). This will seek to improve the quality of the town centre environment and promote more flexibility by increasing the range of community, leisure, and social facilities on offer. Encouraging a greater range of uses will help to reduce vacancy rates, which exceed UK average levels. Alongside this the masterplan identifies town centre wide environmental improvements including green and blue infrastructure improvements, active travel links, new public spaces to facilitate social distancing, tree planting, heritage trails and building character and street art improvements.</p> <p>The Replacement LDP acknowledges that Town centres need to maintain their diversity if they are to retain their vitality and viability, and the range and variety of shops and services has changed over time and will continue to evolve. However, there is a need to ensure that commercial centres do not lose their ‘critical mass’ of retail units to the extent that they can no longer function as viable shopping centres. Accordingly, there is a need to strike a balance between retailing and non-retailing uses in commercial centres to ensure the optimum mix, and thus enhance the vitality and viability of those centres. Policy ENT7 recognises that the Primary Shopping Areas of the County Borough’s town centres are in need of particular protection from competing uses. Primary shopping frontages can complement ongoing public realm pedestrianisation and town centre regeneration objectives, which seek to increase the retail offer of the centres in a pleasant, attractive environment.</p>

	<p>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.</p> <p>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.</p> <p>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).</p>	<p>residential development on suitable brownfield sites within town centres)</p>	<p>The Spatial Strategy of the Replacement LDP prioritises the development of land within 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. Growth is apportioned 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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p>
400	<p>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</p>	<p>No changes proposed – support the Spatial Strategy and allocation of Land South East of Pont Rhyd-y-cyff (COM 1(3)).</p>	<p>Comments noted</p>



	<p>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.</p> <p>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.</p> <p>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.</p>		
554	How many houses will be built	No changes proposed	Policy SP1 Regeneration and Sustainable Growth Strategy (See Appendix 1 – Deposit Local Development Plan) makes provision for 9,207 new homes to meet a housing requirement of 7,575 dwellings over the 15 year LDP period from 2018 to 2033.
287	Support - please see covering letter submitted	No changes proposed – support	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)	Re-proportioning of strategic growth away from the grouped settlement of 'Pyle, Kenfig Hill	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 to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables sustainable growth is proposed to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pencoed and with the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly'.

<p>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.</p> <p>More specifically, Llanmoor supports the apportionment of sustainable growth at Bridgend as the Primary Key Settlement 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:</p> <p><b>Regeneration Growth Areas</b></p> <ul style="list-style-type: none"> <li>- Maesteg (Main Settlement – Tier 2): 685 units (7%)</li> <li>- Porthcawl (Main Settlement – Tier 2): 1,277 units (14%)</li> </ul> <p><b>Sustainable Growth Areas</b></p> <ul style="list-style-type: none"> <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> <p><b>Outside Regeneration Growth Areas and Sustainable Growth Areas</b></p> <ul style="list-style-type: none"> <li>– Valleys Gateway (Main Settlement – Tier 3): 675 units 7%</li> <li>– Local Settlements (Tier 3): 347 units (4%)</li> </ul> <p>Llanmoor retain the view that over 1,000 units attributed to the grouped settlements of Pyle, Kenfig and North Cornelly is</p>	<p>and North Cornelly' and towards Bridgend.</p>	<p>Whilst Pyle, Kenfig and North Cornelly was not identified as a growth area in the existing LDP, an alternative spatial strategy is being proposed for the Replacement LDP. The basis for this strategy is detailed within the Spatial Strategy Background Paper and it is considered the best option to align with the Vision and also the Key Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP is seeking to address. The Strategy is considered most conducive to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales' placemaking principles. It will maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites in accordance with the site search sequence and seek to minimise pressure on BMV agricultural land, subject to site-specific assessment.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>The level of growth apportioned to Pyle, Kenfig Hill and North Cornelly is unequivocally consistent with the Settlement Hierarchy, Spatial Strategy and LHMA. Moreover, the proposed allocation (Land East of Pyle) is supported with comprehensive, robust technical and viability evidence to demonstrate that the site is both viable and deliverable. This is documented within the Candidate Site Assessment.</p> <p>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.</p> <p>For these reasons, the proposal to re-proportion strategic growth away from the grouped settlement of 'Pyle, Kenfig Hill and North Cornelly' and towards Bridgend is not supported.</p>
--	--	--

	<p>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.</p>		
400	<p>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 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.</p> <p>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</p>	<p>None – support the Spatial Strategy and allocation of Land South East of Pont Rhyd-y-cyff (COM 1(3)).</p>	<p>Comments noted (refer to Spatial Strategy Options Background Paper and Candidate Assessment).</p>

	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.	None – support the Spatial Strategy, Distribution of Housing and allocation of Parc Afon Ewenni (COM1(1)).	Comments noted (Refer to Growth Options Background Paper, Spatial Strategy Options Background Paper, 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	Alter the Bridgend 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 Merthyr Mawr as a Local Settlement and significant growth in this vicinity would not accord with this classification. Refer also to Background Paper 3: Spatial Strategy Options.  Table 7 within the Deposit Plan clearly identifies the level of growth attributable to Local Settlements outside of Growth Areas. This reflects the fact 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.

<p>maintains that Laleston should form part of the Bridgend Sustainable Growth Area and the settlement should not be overlooked as a sustainable location for growth.</p> <p>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:</p> <ul style="list-style-type: none"><li>• Option 1 – A scheme of 235 to 268 units and associated play space and landscaping buffers.</li><li>• Option 2 – A scheme of 490 to 560 units and associated play space and landscaping buffers</li><li>• Option 3 – A scheme of 750 to 860 units, associated play space, landscaping buffers and local centre.</li></ul> <p>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</p>	<p>The Candidate Site Assessment clearly states that Laleston is identified as a 'Local Settlement' where new development should be contained within the existing settlement boundary. The Candidate Site referenced (347.C1) is located outside the existing settlement boundary and is therefore considered to represent an unacceptable incursion into the open countryside, hence, this site is not proposed for allocation and the representor's proposal is not supported.</p>
--	--

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

<p>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.</p>		
<p><u>Other Strategic Sites</u></p> <p>BDW is concerned that a number of the identified Strategic Sites have environmental constraints. There are also significant infrastructure improvements and works required to facilitate developments which would likely restrict the timing of the delivery of these sites until later in the plan period. It is therefore considered that the Deposit Draft RLDP must allow for some flexibility in the likely event that the proposed strategic sites will not deliver quickly, nor at the quantum anticipated – and that the remedy to this would be to allocate a number of sustainable, edge of settlement allocations which can be shown as deliverable and viable in the short term, such as land to the west of Laleston (Candidate Site Ref: 347.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.</p>	<p>General comment regarding the deliverability of proposed strategic sites and a proposal to allocate 347.C1 to enhance flexibility.</p>	<p>All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs. This process provides a high degree of confidence that the sites included within the Deposit Plan are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.</p> <p>Moreover, 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.</p> <p>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.</p> <p>As such, the proposal to include Candidate Site 347.C1 is not supported and is also contrary to the Settlement Hierarchy and Spatial Strategy. The total level of housing provision within the Deposit Plan is set appropriately</p>



			with a flexibility allowance to ensure delivery of the housing requirement, taking into account the potential for non-delivery and unforeseen issues in accordance with the Development Plans Manual.
170	<p>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.</p> <p>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.</p> <p>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 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 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</p>	<p>Comment that the settlement hierarchy limits growth.</p> <p>Support 20% flexibility allowance</p> <p>De-allocate some brownfield regeneration sites</p>	<p>The Settlement Hierarchy has been defined based on a robust Settlement Assessment (2019, revised in 2021). This accords with the Spatial Strategy (refer to Spatial Strategy Options Background Paper) and numerous deliverable sites have been identified to enable delivery of the housing requirement (refer to the Strategic Growth Options Background Paper). This concern is not supported.</p> <p>Comment noted. An appropriate flexibility allowance (10%) has been embedded into the Deposit Plan and the basis for this allowance 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.</p> <p>These comments are noted, although no action is considered necessary. Two existing large scale brownfield regeneration sites were initially proposed for re-allocation (Parc Afon Ewenni and Porthcawl Waterfront) within the Replacement LDP, both of which are considered deliverable components of housing supply to enable delivery of the housing requirement. Before being 'rolled forward' into the Deposit Plan, both sites were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. In the case of Porthcawl Waterfront, there has been a substantial change in circumstances to demonstrate the sites can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment).</p> <p>For Parc Afon Ewenni, 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.</p> <p>For 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. As such, the proposed change to Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p>

	<p>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.</p>		<p>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 Porthcawl Waterfront are not supported.</p> <p>In addition to the two aforementioned 'rollover' sites incorporated within the New Housing Allocations Component of supply, there are also three brownfield regeneration allocations within the existing LDP that the Council intends to re-allocate as Long-Term Regeneration Sites. These include Maesteg Washery, Coegnant Reclamation Site (Caerau) and the Former Cooper Standard Site, Ewenny Road (Maesteg). The retention of such sites represents a necessary degree of continuity with the first adopted LDP, which is essential to implement the long-term regeneration strategy embodied within the Replacement LDP Vision. However, for the avoidance of doubt, and in accordance with national policy, these Long-Term Regeneration Sites are not included as a component of housing supply. The housing land supply will therefore not be dependent on their delivery, in recognition of the fact that they require longer lead-in times, preparatory remediation-based enabling works and/or more detailed strategic master plans before they can come forward. Whilst Long-Term Regeneration sites will still be allocated in the plan to enable their delivery, they will not be relied upon as contributing to the housing requirement and will also not be included in the windfall allowance. They are essentially 'bonus sites', notwithstanding the fact that these significant brownfield sites are highly conducive to sustainable development and delivery of the full range of placemaking principles outlined in Planning Policy Wales. This is clearly referenced within the Housing Trajectory Background Paper. Therefore, whilst the representor's concerns regarding these sites are noted, they are considered inconsequential to delivery of the Replacement LDP's housing requirement. This is considered in further detail within the Spatial Options Background Paper, the Minimising the Loss of the Best and Most Versatile (BMV) Agricultural Land Background Paper and the Candidate Site Assessment.</p>
306	<p>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</p>	<p>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).</p>	<p>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.</p> <p>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.</p> <p>The proposal to place a greater reliance on small to medium sized greenfield sites is not supported. Several sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infrastructure problems and it is 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</p>

	<p>(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.</p>		<p>settlement and/or necessary facilities and infrastructure improvements could be provided in support of the development.</p> <p>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.</p> <p>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.</p> <p>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.</p>
222	<p>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:</p>	Support spatial strategy	Comments noted (Refer to Growth Options Background Paper and Spatial Strategy Options Background Paper).

<p>1. The Settlement Assessment considers the grouped settlements of Pyle/ Kenfig Hill/ North Cornelly to be a main settlement (Tier 2);</p> <p>2. The LHMA recognises growth at main settlements, including North Cornelly and a significant shortfall of affordable housing;</p> <p>3. The Plan Wide Viability Assessment provides an analysis of the plan wider viability which aside from Llynfi, Ogmere and Garw Valleys all sites are considered viable based against varying levels of affordable housing provision, and</p> <p>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.</p> <p>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 which should not be dismissed. In addition, as part of the technical information submitted to the Candidate Sites Stage 2 and PS 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. Whilst Bellway support the level of housing distributed to Pyle, Kenfig Hill and North Cornelly as set out in Table 6, Land East of Pyle should be deallocated as the level of growth is a Strategic Development Plan</p>	<p>Propose allocation of Land at Heol Fach, North Cornelly (Candidate Site 222.C1)</p>	<p>The representor has submitted a comprehensive viability assessment for Land at Heol Fach, North Cornelly. Therefore, demonstrating that the site is viable and deliverable.</p> <p>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 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.</p>
---	--	---

	(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	<p>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.</p> <p>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 proximity to the town centre where active travel and public transport can be more readily accessed by residents.</p>	Increase the distribution of housing towards Pencoed	<p>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 (2019, revised in 2021) has been undertaken to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables sustainable growth is proposed to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pencoed and with the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly'.</p> <p>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.</p> <p>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.</p> <p>Moreover, the level of residential development that can be accommodated within Pencoed is limited by the existing development moratorium. As detailed within the Development West of the Railway Line, Pencoed Background Paper, any new development which generates a net increase in vehicular movement will exacerbate congestion either side of the level-crossing and at the complex over-bridge junction between the eastern end of the relief road and Penybont Road. It is recognised that development capacity to the west of the railway line would not be of sufficient scale to generate the required level of developer-funded infrastructure required to resolve the problem within the Plan period. Significant assessment has been undertaken into developing a solution which is likely to require major interventions to include the closure of the Hendre Road level crossing as well as a replacement Penprysg Road bridge with significantly improved capacity and active travel infrastructure. However, the available solutions are subject to many constraints which would need to be overcome through further assessment and design and will require collaboration of several statutory undertakers. There are also restrictions in terms of funding, with no existing guarantees that the required costs for major intervention can be met over the replacement plan period. As such, the development moratorium in Pencoed should be retained within the revised Local Development Plan 2018 - 2033 until a suitable transport intervention materialises.</p> <p>Notwithstanding the representor's comments, the proposed spatial distribution of housing accords with both the Spatial Strategy and Settlement Hierarchy (refer to Spatial Strategy Options Background Paper). Numerous deliverable sites have been identified to enable delivery of the housing requirement (refer to the Strategic Growth Options Background Paper). The justification for the proposed site allocations is clearly set out in the Candidate Site Assessment. Therefore, the representor's proposal is not supported.</p>
219	This policy builds on Policy SP1 (Regeneration and Sustainable Growth	No proposed changes.	Comments of support acknowledged.

	<p>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.</p> <p>Support: Policy SP2 is supported.</p>	<p>Supports Land East of Pencoed as a means of delivering the growth strategy.</p>	
407	<p>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.</p>	<p>No proposed changes. Supports allocation of Land South of Bridgend as a means of delivering the growth strategy.</p>	<p>Comments of support acknowledged.</p>
425	<p>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</p>	<p>Objection to settlement hierarchy.</p>	<p>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 to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables sustainable growth is proposed to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pencoed and with the grouped Settlement of ‘Pyle, Kenfig Hill and North Cornelly’.</p> <p>Whilst Pyle, Kenfig and North Cornelly was not identified as a growth area in the existing LDP, an alternative spatial strategy is being proposed for the Replacement LDP. The basis for this strategy is detailed within the Spatial Strategy Background Paper and it is considered the best option to align with the Vision and also the Key Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP is seeking to address. The Strategy is considered most conducive to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales’ placemaking principles. It will maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites in accordance with the site search sequence and seek to minimise pressure on BMV agricultural land, subject to site-specific assessment.</p> <p>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</p>

	<p>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.</p>		<p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>The level of growth apportioned to Pyle, Kenfig Hill and North Cornelly and Porthcawl etc. is unequivocally consistent with the Settlement Hierarchy, Spatial Strategy and LHMA.</p> <p>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.</p> <p>For these reasons, the proposal to re-proportion strategic growth away from the grouped settlement of 'Pyle, Kenfig Hill and North Cornelly' and towards Bridgend is not supported.</p>
391	<p><b>Summary of the Background to Land at City Farm</b>  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</p>	<p>Concerns regarding mix of sites and windfall allowance.</p>	<p>Comments noted.</p> <p>Identification of appropriate proposed allocations 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.</p> <p>The windfall allowance is not considered higher than average. 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 (UCS, 2020) was published alongside the Deposit Plan to provide further analysis of the potential urban capacity of the County Boroughs' settlements for housing to evidence the</p>

<p>reference P/06/1465/FUL and an application in 2015 for the development of 8 dwellings on part of the site under reference P/15/236/FUL. This demonstrates that during the adopted plan period the site was deemed appropriate for development and approval was granted for the aforementioned development.</p> <p>Policy COM2 <i>Residential Allocations outside the Strategic Regeneration Growth Areas</i> 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.</p> <p>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.</p> <p><b>The Preferred Strategy Approach to Bettws</b></p> <p>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.</p> <p>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</p>		<p>expected small and windfall site allowance rate. This UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this particular component of housing supply. It therefore demonstrates (in addition to past trends) that the small and windfall site allowance rate utilised in the Replacement LDP is both realistic and deliverable. It also serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP. The representor's concerns are therefore unsubstantiated and not supported. Moreover, the housing trajectory will be reviewed as the plan progresses and as part of the monitoring framework of the Replacement LDP. Refer to the Housing Trajectory Background Paper and UCS.</p>
--	--	--



<p>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.</p> <p>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.</p> <p><b>Deposit BRLDP Approach to Bettws Summary of the Approach</b></p> <p>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 <i>"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."</i></p> <p>The BRLDP identifies that Local Settlements would contribute around 4% of the overall housing requirement (circa.347 homes), however, no new</p>	<p>Proposal to re-define Bettws as a Regeneration Area due to similarities with the Ogmore and Garw Valleys</p>	<p>Regeneration Areas aim to enable development of a scale and nature that is tailored to community needs, whilst diversifying and strengthening local economies, connecting communities to wider opportunities and protecting their high quality environments. Regeneration Areas therefore aim to capitalise on their rural surroundings to promote active lifestyles, grow the tourism industry and facilitate smaller-scale development on primarily brownfield sites. This latter element recognises that distinctive approaches are required to bring forward development in these areas, which could include initiatives such as co-operative housing, self-build plots and custom build opportunities alongside other forms of development.</p> <p>Bettws is defined as a lower scoring Local Settlement by the Settlement Assessment and is not considered to demonstrate as significant a degree of self-containment as the Ogmore and Garw Valleys, as evident by the services and facilities score and the sustainable transport and accessibility score within the Settlement Assessment. As such, a similar designation is not considered warranted. The strategy is considered appropriate in its current form to enable small scale development within the existing settlement boundary of Bettws.</p>
---	---	--

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 Ogmor 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 Ogmor 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 smaller-scale 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.”*

<p>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 <i>benefit from community based regeneration and recognise that a range of localised approaches are required to incite community investment opportunities</i>.</p> <p>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.</p> <p>Accordingly, on this basis we would <b>object to Policy SP1 Regeneration and Sustainable Growth Strategy</b> in that Bettws should be included within the policy as a Regeneration Area.</p> <p><b>Comments on the Approach – Bettws as a Local Settlement</b></p> <p>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:</p> <p>Furthermore, paragraph 5.2.80 of the Deposit BRLDP lists Bettws as a settlement benefitting from an active travel route.</p> <p>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 Report. Such an increase</p>	<p>Reflect Proposed Active Travel Route for Bettws within Settlement Assessment</p>	<p>The Settlement Assessment’s tri-principle scoring matrix considers whether active travel routes are present within settlements in arriving at an overall score. The proposed active travel route in Bettws has not been constructed and therefore the Settlement Assessment is considered accurate in its current form.</p>
---	---	--

<p>would allow for greater justification for the settlement to be identified as a Regeneration Area.</p> <p><b>The Potential for Bettws</b></p> <p>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.</p> <p>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.</p> <p>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 regeneration site to the north.</p>	<p>Extend the settlement boundary for Bettws to accommodate Land at City Farm to enable regeneration</p>	<p>All allocations have been proposed based on the outcome of the Candidate Site Assessment, their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All new proposed allocations are considered to demonstrate delivery in accordance with the requirements set out in the Development Plans Manual.</p> <p>A Settlement Boundary Review (2021) was also published alongside the Deposit Plan consultation documents. This study provides the background and justification for the review of the settlement development boundaries through the Replacement Local Development Plan (2018-2033). It includes a list of matters that have been considered when determining if and how an existing settlement boundary should be changed. It also includes maps and tables for the County Borough of Bridgend illustrating the proposed changes and explaining the reasons for them. This Study did not propose any changes to the existing settlement boundary of Bettws, and extending the settlement boundary to enable development of greenfield land within an isolated Local Settlement is not supported.</p>
---	--	--

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.

<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>		
--	--	--

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 Ogmere 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)

<p>to create high quality and sustainable places.</p> <p><b>Conclusion</b></p> <p>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.</p> <p>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.</p>		
---	--	--

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	<p>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.</p> <p>BDW also have concerns that it may not be possible for all developments to comply with</p>	Remove local policies on design, placemaking, climate change, transport and accessibility and defer to national policies.	<p>Whilst the comments are noted, these policies are considered fundamental achieve the Vision, Aims and Objectives of the Replacement LDP and to deliver sustainable development in a manner that will achieve sustainable places and maximise the well-being of Bridgend County Borough's residents and its communities. As such, the representor's comment that "these policies could be considered to be superfluous" is not supported.</p> <p>Comments noted, although the policy is considered appropriate in the current form.</p>



	<p>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.</p> <p>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.</p>	<p>Incorporate 'where relevant' into SP3.</p> <p>Query on how SP4 will be implemented and measured.</p>	<p>Comments noted, although, as specified within SP4, all applications for development proposals must clearly demonstrate how they contribute to climate change mitigation and adaptation through application of the criteria based policies. The criteria within SP4 require development to both mitigate and adapt to climate change, thereby minimising its underlying causes and planning for its consequences.</p>
1366	<p><b>Policy PLA1: Porthcawl Waterfront, Porthcawl Regeneration Growth Area</b> 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.</p> <p><b>Policy PLA2: Land South of Bridgend (Island Farm), Bridgend Sustainable Growth Area</b> 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</p>	<p>Change to housing trajectory for Porthcawl Waterfront.</p> <p>Change to housing trajectory for Land South of Bridgend (Island Farm).</p>	<p>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.</p> <p>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 Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p> <p>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</p>

<p>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.</p>		<p>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 South of Bridgend (Island Farm) trajectory is both unsubstantiated and not supported.</p>
<p><b>Policy PLA3: Land West of Bridgend, Bridgend Sustainable Growth Area</b> 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.</p>	<p>No proposed changes.</p>	<p>Comments noted.</p>
<p><b>Policy PLA4: Land East of Pencoed, Pencoed Sustainable Growth Area</b> 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.</p>	<p>Change to housing trajectory for Land East of Pencoed.</p>	<p>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.</p>
<p><b>Policy PLA5: Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area</b> 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</p>	<p>Land East of Pyle Allocation to be considered via the forthcoming SDP rather than the Replacement LDP</p>	<p>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</p>

	<p>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.</p>		<p>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.</p> <p>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.</p> <p>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.</p>
488	<p>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.</p>	<p>No evidence that sustainable value has been delivered on with previous developments</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>Strategic site allocations identified by policies PLA1-PLA5 (See Page 62) detail the site-specific requirements including masterplan development principles and development requirements. Such requirements include pursuing transit-orientated development that prioritises walking, cycling and public transport uses, whilst reducing private motor vehicle dependency. Other requirements will include creating multi-functional green infrastructure that facilitates active travel, enhances biodiversity, provides sustainable drainage and fosters healthy communities. There must be emphasis on retaining existing trees and hedgerows within public realm, incorporating appropriate landscaping, and 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. Buildings will be required to face open spaces and create active street frontages to enhance cohesiveness, foster a strong sense of place and ensure community safety.</p> <p>Furthermore, Strategic Policy 3: Good Design and Sustainable Placemaking will ensure that development will contribute to creating high quality, attractive, sustainable places that support active travel and healthy lives and enhance the community in which they are located, whilst having full regard to the natural, historic and built environment.</p>
516	<p>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.</p>	<p>Concerns regarding plan / consultation</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p>

			<p>The Replacement LDP has been prepared in line with the Well-Being of Future Generations Act of which places a duty on public bodies to carry out sustainable development. The LDP Vision has been developed to take into account the 7 Well-being Goals and Bridgend's Local Well-being Plan with the specific characteristics and key issues affecting the County Borough. Background Paper 10 (See Appendix 50) demonstrates that the Replacement LDP assists in the delivery of the 7 Well-being Goals.</p> <p>The Replacement LDP has also been prepared in line with Bridgend Public Service Board Well-being Plan objectives. The Bridgend Well-being Plan outlines the things that Bridgend Public Service Board will work together on over the next five years; our wellbeing objectives and steps, and how we want Bridgend to look in 10 years' time. Background Paper 9 (See Appendix 49), demonstrates that the Replacement LDP assists in the delivery of the local well-being plan.</p> <p>It is the view of the Council that the overall objectives of the Community Involvement Scheme (CIS) as originally set out in with the approved Delivery Agreement, including the CIS have been met. It is also considered that the LDP has been prepared in accordance with the LDP 'Preparation Requirements' set out in the Development Plans Manual (Edition 3).</p> <p>The Council previously consulted the public on the Preferred Strategy of which was held from 30th September to 8th November 2019. Following the public consultation period the Council was required to consider all representations made in accordance with LDP Regulation 16(2) before determining the content of the deposit LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 – Preferred Strategy &amp; Initial Consultation Report) for publishing. This report was subsequently signed off by members of Council.</p> <p>As part of Stage 4 of the Delivery Agreement, the Council was required to undertake Deposit public consultation for a statutory period of 6 weeks, however the Council made an allowance for 8 weeks in order to maximise public participation and to enable the public to have their say in order to deliver the best outcomes for the County Borough.</p>
707	<p>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 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 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</p>	<p>Concerns regarding employment</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned by 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.</p> <p>Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p>

	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.		<p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p> <p>Whilst it is beyond the scope of the LDP to guarantee that employers will come to the area, Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward.</p>
779	Please see my previous comments	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	<p>Comments noted. 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.</p> <p>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.</p> <p>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.</p> <p>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,</p>

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

	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 County Borough to determine if they are still appropriate in light of the Replacement LDP Strategy and / or would constitute appropriate amendments to existing boundaries. This review (See Appendix 38) has informed settlement boundaries within the Deposit Replacement LDP. Development that is proposed to take place outside of the settlement boundaries and into the 'countryside' would be assessed under Policy DNP1: Development in the Countryside (alongside other relevant policies within the Deposit Plan, depending on the nature of the proposal). Policy DNP1 will ensure that the integrity of the countryside is conserved and enhanced. There is a presumption against development in the countryside and only in exceptional circumstances will development be acceptable.
874	<p>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.</p> <p>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.</p> <p>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.</p> <p>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 dependent upon the availability of funding.</p>	<p>Change wording of PLA12 from:</p> <p><i>“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...”</i></p> <p>To</p> <p><i>“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.</i></p>	<p>The wording of Policy PLA12 prioritises the provision of active travel measures within development proposals and places the emphasis on developers to implement appropriate measures in accordance with the Council's Active Travel Network Map and the Active Travel (Wales) Act 2013. The supporting text (para 5.2.79) goes on to clearly state that PLA12 "...supports new developments that incorporate well-designed safe features and facilities that will be accessible to all people to walk and cycle for everyday journeys..." Paragraph 5.2.82 elaborates further by stating that priority will be given to proposals that incorporate walking and cycling and Paragraph 5.2.84 emphasises the importance of incorporating the measures described in Policy PLA12 in the delivery of any strategic site or any proposal. It also describes the means of securing such infrastructure through the planning system.</p> <p>If anything, the changes proposed would reduce the emphasis on <b>all</b> development proposes needing to maximise walking and cycling. Therefore, the change is not considered necessary.</p>

<p>Our proposals will also incorporate existing route INM-BR-74, which seeks an 'enhanced route through dropped kerb provision, and re-surfacing/enhanced lighting from Charles Street to Clos-y-Waun', also shown at Figure 1. This is identified as a short-term aim.</p> <p>We note that there will be a separate consultation on the proposed Active Travel Network Map between July and October 2021, after which the final network map will be submitted to the Welsh Government for approval. Please contact us when this consultation starts.</p> <p>Draft Strategic Policy SP3 seeks to maximise opportunities for active travel and increased public transport use and promote connections within and outside the site to 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.</p> <p>The Active Travel policy itself, Draft Policy PLA12 states that:</p> <p><i>"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...</i></p> <p><i>...2) Delivery of proposals identified within the Council's Active Travel Network Map;</i></p> <p><i>3) Improvements, connections, and/or extensions to: a) Routes and proposals identified on the Existing Routes Map and Active Travel Network Map..."</i></p> <p>The supporting text at paragraph 5.2.81 states that <i>"opportunities should be maximised to further improve upon these routes, providing walking connections which</i></p>	<p><i>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 financial contributions towards the delivery offsite, of the following measures as appropriate..."</i></p>	
---	---	--



	<p><i>will allow integration between new developments and existing communities.”</i></p> <p>We welcome the wording in Draft Policy PLA12 and consider it important that the policy’s wording maximises provision <u>with 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.</p> <p>Therefore, the first part of policy PLA12 should read:</p> <p><i>“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.</i></p> <p><i>Development proposals must prioritise the provision within the site, and/or provide or make <del>Development must maximise walking and cycling access by prioritising the provision within the site, and providing or</del> making financial contributions towards the delivery offsite, of the following measures as appropriate...”</i></p>		
223	<p><b>Policy PLA1: Porthcawl Waterfront, Porthcawl Regeneration Growth Area</b> 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.</p>	<p>Change to housing trajectory for Porthcawl Waterfront.</p>	<p>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.</p> <p>Further to this, an additional Stakeholder Group Meeting was held on 27th May 2022. The representor 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 no outstanding matters of dispute.</p>

	<p><b>Policy PLA2: Land South of Bridgend (Island Farm), Bridgend Sustainable Growth Area</b> 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.</p> <p><b>Policy PLA3: Land West of Bridgend, Bridgend Sustainable Growth Area</b> 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 Bridgend and Pencoed.</p> <p><b>Policy PLA4: Land East of Pencoed, Pencoed Sustainable Growth Area</b></p>	<p>Change to housing trajectory for Land South of Bridgend (Island Farm).</p> <p>Change to housing trajectory</p>	<p>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 Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p> <p>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 Meeting. As such, the proposed change to Land South of Bridgend (Island Farm) trajectory is both unsubstantiated and not supported.</p> <p>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</p>
--	--	---	--

	<p>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</p> <p><b>PLA5: Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area</b></p> <p>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 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.</p>	<p>for Land East of Pencoed.</p> <p>Land East of Pyle Allocation to be considered via the forthcoming SDP rather than the Replacement LDP</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
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 with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision.

			As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations within the Deposit Plan progress.
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	No specific comments to make.	None	Comments noted
400	<p>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.</p> <p>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.</p>	No changes proposed – support the housing requirements and flexibility allowance.	Comments noted.
554	There are so many issues at the maesteg washers site already by having more houses will only increase these problems and issues	No changes proposed – concerns over Maesteg Washery site	<p>The LDP Spatial strategy (See Appendix 43 – Background Paper 3) 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.</p> <p>The Maesteg Washery site (Policy COM1 (R3)) presents a significant opportunity for the future regeneration of the area and would play a significant step in the revitalisation of Maesteg. The LDP acknowledges that this brownfield regeneration site will require remediation-based viability issues to be addressed before it can be taken forward and the site is in an area characterised by low house prices and little development activity. Therefore the site is allocated as a long-term regeneration site, which the Council will remain committed to, but not rely on to help deliver the housing requirement. In this way, the remediation strategy, necessary enabling works and</p>

			master planning can be progressed in a manner that ensures the future redevelopment of the site can have the greatest positive impact on the surrounding community.
287	Support - please see covering letter submitted	No changes proposed – support	Comments noted
308	<p><b>Policy PLA1: Porthcawl Waterfront, Porthcawl Regeneration Growth Area</b> 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.</p> <p><b>Policy PLA2: Land South of Bridgend (Island Farm), Bridgend Sustainable Growth Area</b> 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.</p> <p><b>Policy PLA3: Land West of Bridgend, Bridgend Sustainable Growth Area</b> Llanmoor supports placemaking Policy PLA3 Land West of Bridgend Sustainable Growth Area. As previously demonstrated in written submissions to the Candidate</p>	<p>Change to housing trajectory for Porthcawl Waterfront.</p> <p>Change to housing trajectory for Land South of Bridgend (Island Farm).</p> <p>No proposed changes.</p>	<p>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.</p> <p>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 Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p> <p>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 Meeting. As such, the proposed change to Land South of Bridgend (Island Farm) trajectory is both unsubstantiated and not supported.</p> <p>Comments noted.</p>

<p>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.</p>		
<p><b>Policy PLA4: Land East of Pencoed, Pencoed</b> 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.</p>	<p>Change to housing trajectory for Land East of Pencoed.</p>	<p>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.</p>
<p><b>Policy PLA5: Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area</b> 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.</p>	<p>Land East of Pyle Allocation to be considered via the forthcoming SDP rather than the Replacement LDP</p>	<p>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.</p> <p>Moreover, work on the SDP has not yet commenced 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</p>

			<p>formal representations on the Bridgend Deposit Plan and cite no objections to this proposed allocation and support the Deposit Plan.</p> <p>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.</p>
400	<p>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.</p>	<p>None – support the housing requirements and flexibility allowance.</p>	<p>Comments noted (refer to Housing Trajectory Background Paper).</p>
105 1	<p>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,</p>	<p>None – support the Growth Strategy, Spatial Strategy and allocation of Parc Afon Ewenni (COM1(1)).</p>	<p>Comments noted.</p> <p>In terms of Parc Afon Ewenni, 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 change, 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.</p>

	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	<p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Remove local policies on design, placemaking, climate change, transport and accessibility and defer to national policies.</p> <p>Incorporate 'where relevant' into SP3.</p> <p>Query on how SP4 will be implemented and measured.</p> <p>Challenge PLA11 for not being in accordance with the transport hierarchy.</p>	<p>Whilst the comments are noted, these policies are considered fundamental achieve the Vision, Aims and Objectives of the Replacement LDP and to deliver sustainable development in a manner that will achieve sustainable places and maximise the well-being of Bridgend County Borough's residents and its communities. As such, the representor's comment that "these policies could be considered to be superfluous" is not supported.</p> <p>Comments noted, although the policy is considered appropriate in the current form. No action considered necessary.</p> <p>Comments noted, although, as specified within SP4, all applications for development proposals must clearly demonstrate how they contribute to climate change mitigation and adaption through application of the criteria-based policies. The criteria within SP4 require development to both mitigate and adapt to climate change, thereby minimising its underlying causes and planning for its consequences. No action considered necessary.</p> <p>PLA11 is a Development Management Policy that supports delivery of SP5: Sustainable Transport and Accessibility. The first criterion within proposed SP5 is for development to accord with the sustainable transport hierarchy for planning, which is consistent with Planning Policy Wales. PLA 11's supporting paragraph 5.2.76 further recognises that "the availability of parking spaces and parking charges applied, are key tools in facilitating a reduction in journeys by private car and encouraging a change in mode choice towards more sustainable means of travel". Further local guidance will be provided in a revised future Parking Standards SPG. No action considered necessary.</p>



	can lead to developments dominated by car parking.		
170	<p>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.</p> <p>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.</p> <p>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.</p> <p>The HBF notes an inconstancy on figures Table 6 Porthcawl 1,277 units whereas PLA1: Porthcawl Waterfront 1,115 units.</p>	<p>Enhanced clarity on Good Design within SP3</p> <p>Query on rationale for PLA7</p> <p>Remove requirement for affordable housing in clusters of no more than 10 units.</p> <p>Proposal to correct an apparent inconsistency between Table 6 and PLA 1.</p>	<p>The Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with Planning Policy Wales and the definitions therein. Whilst the representor's comments are noted, the policy is considered appropriate. No action is considered necessary.</p> <p>The rationale for this policy is clearly documented in the Development West of the Railway Line, Pencoed Background Paper. This paper makes use of several recent studies focussed on the highway network in Pencoed to determine the requirement for the existing moratorium on development, as prescribed by Policy PLA6 in the existing adopted LDP, to be retained in the Replacement LDP. Significant assessment has been undertaken into developing a solution which is likely to require major interventions to include the closure of the Hendre Road level crossing as well as a replacement Penprysg Road bridge with significantly improved capacity and active travel infrastructure. However, the available solutions are subject to many constraints which would need to be overcome through further assessment and design and will require collaboration of several statutory undertakers. There are also restrictions in terms of funding, with no existing guarantees that the required costs for major intervention can be met over the replacement plan period. It is therefore concluded that the existing development moratorium in Pencoed should be retained within the revised Local Development Plan 2018 - 2033 until a suitable transport intervention materialises.</p> <p>As outlined in the Affordable Housing Background Paper, in order to facilitate creation of mixed communities, the Replacement LDP seeks to deliver affordable housing secured through section 106 through sustainable clusters of no more than ten affordable units, interspersed throughout the respective developments. Contrary to the representor's statement, a cluster of 10 affordable units is not considered a 'small cluster' in the context of creating sustainable, balanced, mixed-tenure communities. Rather, it is designed to minimise management issues that can otherwise result from single units being 'pepper potted' throughout developments. Conversely, discrete clusters of more than 10 affordable units can become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities due to over-concentration of affordable tenures. A careful balance has to be achieved and clusters of no more than 10 affordable units is considered optimal to this end. Therefore, the representor's proposal is not supported.</p> <p>Table 6 is not intended to match PLA1. Table 6 documents the total housing provision by Settlement, akin to the total documented in Table 7. This includes the contribution identified from the Porthcawl Waterfront site as referenced in PLA1 and also includes existing landbank commitments. This will continue to be updated in accordance with the housing trajectory as the plan progresses.</p>
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	Re-allocate Porthcawl Waterfront and Parc Afon Ewenni	The justification for the Spatial Strategy is documented in the Spatial Strategy Options Background Paper. The Strategy is considered to best align with this Vision and also the Key Issues, Drivers, Strategic Objectives and Specific Objectives the Replacement LDP is seeking to address. It is considered most conducive to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also

<p>delivery of strategic sites and large housing allocations. However, the applicant wishes to object primarily relating to concern of the deliverability of some of the sites selected for consideration as an allocation which, if fail, will fundamentally impact the requirement to deliver much-needed housing (both market and affordable) and the need to alleviate the ‘continuing difficulties younger households face in accessing home ownership’, as outlined in the LHMA (2021) which have been exacerbated by recent events, including Brexit and the pandemic.</p> <p>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 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.</p> <p>General over-reliance on previously developed / brownfield sites</p> <p>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</p>	<p>as Long-Term Regeneration Sites.</p>	<p>delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales’ placemaking principles. It will maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites in accordance with the site search sequence and seek to minimise pressure on BMV agricultural land, subject to site-specific assessment.</p> <p>Two existing large scale brownfield regeneration sites have been proposed for re-allocation (Parc Afon Ewenni and Porthcawl Waterfront) within the Replacement LDP, both of which are considered deliverable components of housing supply to enable delivery of the housing requirement. Before being ‘rolled forward’ into the Deposit Plan, both sites were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. In both cases, there has been a substantial change in circumstances to demonstrate the sites can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment).</p> <p>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 proposal to alter Parc Afon Ewenni and Porthcawl Waterfront to Long-Term Regeneration Allocations is both unsubstantiated and not supported.</p>
--	---	--

	quantum not attributed towards the overall housing delivery of the plan.		
306	<p><u>Material Considerations</u></p> <p>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 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 smallest number of units during the plan 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 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</p>	<p>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).</p>	<p>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.</p> <p>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.</p> <p>The proposal to place a greater reliance on small to medium sized greenfield sites is not supported. Several sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infrastructure problems and it is 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.</p> <p>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.</p> <p>For the avoidance of any doubt, the represntor submitted some uncorroborated high level viability inputs to the Council, although no comprehensive viability assessment was provided for either site. The Council wrote to all Stage 2 Candidate Site promoters on 21<sup>st</sup> August 2020 to remind site promoters 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, and the representor’s claims to the contrary, no detailed viability appraisal (using the DVM</p>

<p>supportive of these allocations and think their sites can support their delivery by contributing to housing supply delivery in the interim.</p> <p><u>The suitability, viability and deliverability of the proposed sites</u></p> <p>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</p>		<p>or otherwise) was submitted to the Council to demonstrate that either site is viable or deliverable. The proposal to allocate both sites is therefore not supported.</p>
---	--	---

<p>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.</p> <p>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.</p> <p>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</p>		
---	--	--

	<p>(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 period.</p>		
222	<p><b>Policy PLA5: Land East of Pyle, Pyle, Kenfig Hill and North Cornelly Sustainable Growth Area</b></p> <p>Bellway provides comments on the proposal on Land East of Pyle in relation to the key proposals for Porthcawl, Pyle and North Cornelly.</p> <p>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</p>	<p>De-allocate Land East of Pyle from the Replacement LDP and consider allocation within the forthcoming SDP</p>	<p>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. Contrary to the representor's statement, all landowners are committed to working towards ensuring a development site that can be delivered as a comprehensive development. 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.</p> <p>Moreover, work on the SDP has not yet commenced 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</p>

	<p>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.</p> <p>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 and removed from the final version of the Plan. Aside from the recommendation that the site should be deallocated, Bellway consider the allocation of 2,000 dwellings to be a strategic matter that should be considered as part of SDP.</p>		<p>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. In terms of cross boundary implications, 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.</p> <p>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 and de-allocate the site.</p>
221	<p>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 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 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</p>	<p>Object to the 'over-reliance' on rollover sites Porthcawl Waterfront and Parc Afon Ewenni</p>	<p>Two existing large scale brownfield regeneration sites were initially proposed for re-allocation (Parc Afon Ewenni and Porthcawl Waterfront) within the Replacement LDP, both of which are considered deliverable components of housing supply to enable delivery of the housing requirement. Before being 'rolled forward' into the Deposit Plan, both sites were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. In the case of Porthcawl Waterfront, there has been a substantial change in circumstances to demonstrate the sites can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment).</p> <p>For Parc Afon Ewenni, 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..</p> <p>For 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</p>

	<p>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).</p>		<p>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.</p> <p>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 Porthcawl Waterfront are not supported.</p> <p>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,</p> <p>"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".</p> <p>Whilst the Council notes the representor's objection to this conclusion, the proposal is not supported for the reasons outlined.</p>
221	<p>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</p>	<p>Allocate 'fallback sites' to accommodate the potential non-delivery of the Porthcawl Waterfront and Parc Afon Ewenni. Notably: land at Zig Zag Lane, Porthcawl (221.C2) and Land South of Coychurch, Bridgend (221.C3).</p>	<p>Two existing large scale brownfield regeneration sites were initially proposed for re-allocation (Parc Afon Ewenni and Porthcawl Waterfront) within the Replacement LDP, both of which were considered deliverable components of housing supply to enable delivery of the housing requirement. Before being 'rolled forward' into the Deposit Plan, both sites were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. In the case of Porthcawl Waterfront, there has been a substantial change in circumstances to demonstrate the sites can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment).</p> <p>For Parc Afon Ewenni, 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.</p> <p>For 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</p>



<p>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</p>	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>In relation to Zig Zag Lane (Candidate Site Ref: 221.C2) specifically, the Assessment states,</p> <p>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.</p> <p>In relation to Land South of Coychurch (Candidate Site Ref: 221.C3) specifically, the Assessment states,</p> <p>"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".</p> <p>Whilst the Council notes the representor's proposals to include these two sites within the Replacement LDP, these proposals are not supported for the reasons outlined above.</p>
--	--

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 "roll-over" 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

	<p>Coychurch would both provide suitable additional sites to accommodate any shortfalls of the two roll-over sites.</p> <p>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.</p>	<p>Support for Regeneration Sites: Coegnant Reclamation Site, Caerau (COM1(R1)), Former Cooper Standard Site, Ewenny Road, Maesteg (COM1(R2)) and Maesteg Washery (COM1(R3)).</p>	<p>Comments noted.</p>
38	<p>No -But Coastal support this and with their regeneration 'ethos' welcome assisting the Council in any way to achieve their regeneration initiatives</p>	<p>None</p>	<p>Comments noted.</p>
394	<p>support</p>	<p>None</p>	<p>Comments noted.</p>
219	<p>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.</p>	<p>Change wording of SP3.</p>	<p>Comments noted, however, the Planning Inspectorate has advised that 'must' is appropriate terminology for Strategic and Development Management Policies. Therefore, the proposed changes to SP3 are unsubstantiated and not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p>
407	<p>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.</p>	<p>No proposed changes. Supports allocation of Land South of Bridgend as a means of delivering the growth strategy.</p>	<p>Comments of support acknowledged.</p>

Title: Do you have any comments to make on the active, health, cohesive and social communities policies?

ID	Comment	Summary of changes being sought/proposed	Council response
82	<p>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.</p> <p>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).</p> <p>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.</p> <p>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</p>	<p>Proposal for COM2 to describe the affordable housing figure as a ‘target’ and merge with Policies COM 3, 4 and 5.</p> <p>Query why different area-specific and site-specific affordable housing policies are included in COM3.</p> <p>Query on what constitutes ‘an efficient and appropriate density’.</p> <p>Query on how economic infrastructure and renewable energy can be secured as s106 requirements.</p>	<p>Policy COM2 is the Development Management policy to support delivery of the Strategic Policy 6 (SP6). The contribution the Replacement LDP can make to affordable housing provision has been robustly assessed through plan-wide and site-specific viability appraisals (refer to Plan-Wide Viability Assessment and the Affordable Housing Background Paper). SP6 has been formulated in accordance the wording detailed within paragraph 5.59 in the Development Plans Manual (Edition 3) and COM2 supports delivery of this key housing policy. The affordable housing provision is clearly identified as a target within supporting paragraph 5.3.22 of the Deposit Plan. No further revisions are therefore considered necessary on this basis.</p> <p>Whilst related, Policies COM 3, COM 4 and COM 5 provide criteria based policies for on-site affordable housing provision, off-site affordable housing provision and affordable housing exception sites, respectively. More detailed policy coverage on these distinct forms of affordable housing provision are considered necessary in addition to COM2 and all of which support delivery of Strategic Policy 6 (SP6). As such, the proposal to merge the related policies is not supported.</p> <p>The rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. As outlined within the Development Plans Manual, “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. The two are not contradictory, rather the site specific being a refinement of the high level appraisal” (WG, 2020, para 5.89). Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council’s aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3.</p> <p>The Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with Planning Policy Wales. COM6 seeks to achieve these principles by enabling mixed, socially inclusive, sustainable communities through a range of house types and sizes to meet the needs of residents at an efficient and appropriate density. Rather than specifying a numeric requirement, COM6 sets the framework to make the most efficient use of land based on site-specific context, thereby ensuring an appropriate balance of uses can be pursued in a manner that maximises the density of developments without compromising the quality of the living conditions provided.</p> <p>Telecommunications and low carbon technology related infrastructure is and will become increasingly important over the Replacement LDP period with the lasting impacts of the pandemic and additional home working. Planning Policy Wales considers these forms of supporting infrastructure “crucial for economic, social and environmental sustainability” and stresses that “Infrastructure which is poorly designed or badly located can exacerbate problems rather than solving them” (para 3.61). SP10 therefore sets out the holistic requirement for all development proposals to be supported by sufficient existing or new infrastructure, ensuring such provision can be effectively co-ordinated to support the Plan. In order to mitigate likely adverse impacts and/or to integrate</p>

	are covered by other policies or legislation such as building regulations.		a development proposal with its surroundings, reasonable infrastructure provision or financial contributions to such infrastructure must be provided by developers where necessary. The policy wording states that “this will be secured by means of planning agreements/obligations where appropriate” and any such agreements will be subject to Community Infrastructure Levy Regulations and the Tests of Necessity. Therefore, whilst the representor’s comments are noted, the proposed policy wording of SP10 is considered appropriate in its current form.
488	Want evidence that the foundational economy has delivered in this area.	Want evidence that the foundational economy has delivered in this area	<p>Comments noted. The Deposit Plan has been underpinned by 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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>Development of this scale (Sustainable Urban Extensions) 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. The 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.</p>

			<p>Policies PLA1-PLA5 (See Deposit Plan – Page 62) detail the site-specific requirements for the mixed-use Strategic Development Sites in Regeneration Growth Areas and Sustainable Growth Areas. Such requirements include masterplan development principles and development requirements all of which seek to contribute and address the identified key issues and drivers identified through the Replacement LDP preparation process. This will be facilitated through the provision of affordable housing, on-site education provision, public open space and active travel provision.</p>
516	<p>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.</p>	<p>Don't need more housing</p>	<p>Comments noted. The Deposit Plan has been underpinned by 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.</p> <p>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. 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.</p>
707	<p>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 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 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.</p>	<p>Concerns regarding employment</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned by 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.</p> <p>Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is</p>

			<p>projected to support an increase in people in workplace based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p> <p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p> <p>Whilst it is beyond the scope of the LDP to guarantee that employers will come to the area, Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward.</p>
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	<p>Comments noted. As part of the technical supporting evidence base accompanying the Deposit Plan, the Council has undertaken an updated detailed audit of existing outdoor sports and children's playspace across the County Borough (See Appendix 22: Outdoor Sport and Children's Play Space Audit (2021)). 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.</p> <p>Additionally, the Council has undertaken a Green Infrastructure Assessment (See Appendix 23) to guide and shape the planning and delivery of green infrastructure throughout the County Borough. The assessment summaries the findings of the detailed 'audit' of the provision of Outdoor Sports and Children's Playing Space within the County Borough of which is endorsed by Fields in Trust (FIT), whilst also adopting a holistic approach to include green infrastructure assets (such as allotments, cemeteries, woodlands, broad habitats) and the Integrated Network Maps. As such the assessment will provide a mechanism to ensure green infrastructure forms an integral and significant part of development and wider infrastructure proposals.</p> <p>Development proposals including strategic site allocations will be expected to maintain, protect and enhance Bridgend's green infrastructure network and ensuring that individual green assets are retained wherever possible and integrated into any new development.</p> <p>In terms of Strategic Development Sites, Policies PLA1-PLA5 detail the site specific requirements including masterplan development principles and development requirements. Such requirements will ensure that sites retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland), and SINC's. Additionally, green infrastructure and outdoor recreation facilities will be required to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p>
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	Comments noted. The Deposit Plan has been underpinned by 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

			<p>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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>In terms of allocated Strategic Development Sites, Policies PLA1-PLA5 detail the site specific requirements including masterplan development principles and development requirements all of which seek to contribute and address the identified key issues and drivers identified through the Replacement LDP preparation process. This will be facilitated through the provision of affordable housing, on-site education provision, public open space and active travel provision. Development of this scale 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. The 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. Smaller edge of settlement sites have also been considered and allocated (See Policy COM1), and have only been allocated where capacity was clearly demonstrated to accommodate the respective level of growth within the settlement and/or necessary facilities and infrastructure improvements were provided in support of the development. This was considered paramount to avoid impacting negatively on local communities by otherwise exacerbating localised problems.</p> <p>In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could</p>
--	--	--	--



			not proceed. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.
846	<p>Yes SP9 should have an addition para(10) Outdoor Recreation Facilities , including facilities not currently used as the owners are keeping them unused</p> <p>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 facilities etc "</p>	<p>Comments relating to outdoor recreation facilities provision.</p>	<p>For the purposes of preparing the Replacement Local Development Plan the term 'social and community facilities' covers a broad range of activities and services, some of which are in the ownership of the Council, and others that are privately owned, in line with policy contained within Fields and Trust Wales. All facilities are captured in the Outdoor Sport and Children's Playing Space Audit. On this basis, no changes to SP9 are considered necessary.</p> <p>In regard to Paragraph 5.3.67, the Council accepts the proposed amendment, and the supporting paragraph will be revised for the avoidance of any doubt.</p> <p>As part of the technical supporting evidence base accompanying the Deposit Plan, the Council has undertaken an updated detailed audit of existing outdoor sports and children's playspace across the County Borough (See Appendix 22: Outdoor Sport and Children's Play Space Audit (2021)). 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. The document provides reference as to whether each identified facility is accessible for public use or privately owned.</p> <p>Additionally, the Council has undertaken a Green Infrastructure Assessment (See Appendix 23) to guide and shape the planning and delivery of green infrastructure throughout the County Borough. The assessment summaries the findings of the detailed 'audit' of the provision of Outdoor Sports and Children's Playing Space within the County Borough of which is endorsed by Fields in Trust (FIT), whilst also adopting a holistic approach to include green infrastructure assets (such as allotments, cemeteries, woodlands, broad habitats) and the Integrated Network Maps. As such the assessment will provide a mechanism to ensure green infrastructure forms an integral and significant part of development and wider infrastructure proposals.</p> <p>Development proposals including strategic site allocations will be expected to maintain, protect and enhance Bridgend's green infrastructure network and ensuring that individual green assets are retained wherever possible and integrated into any new development.</p> <p>In terms of Strategic Development Sites, Policies PLA1-PLA5 detail the site specific requirements including masterplan development principles and development requirements. Such requirements will ensure that sites retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland), and SINC's. Additionally, green infrastructure and outdoor recreation facilities will be required to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p>
108 5	<p>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.</p>	<p>Concerns relating to over-development within the area.</p>	<p>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.</p> <p>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,</p>

			<p>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. 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. 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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>The plan preparation has involved the assessment of 171 sites, the vast majority of which are greenfield. 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including a range of placemaking principles and masterplan development principles (See Deposit Policy PLA3 – Page 71). Green Infrastructure and Outdoor Recreation Facilities will be required to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance'. The proposed allocation will also be required to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.</p>
874	<p>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 appropriate sites within the settlement, focussing on the re-use of previously developed land.</p> <p>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.</p>	<p>Change wording of Policy COM11 to:</p> <p><i>"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</i></p>	<p>Comment noted. The title of Policy COM11 will be amended so that it is the same in the contents page and the main document. The Key in the Proposals Map will also be amended to represent the correct policy.</p> <p>Comment noted</p> <p>As worded, Policy COM11 clearly states that the Replacement LDP will promote the provision of accessible Natural and Semi-Natural Greenspace wherever suitable opportunities arise. Such opportunities include, but are not limited to, appropriate development proposals. However, the proposed change of wording is considered too flexible. Some development proposals may enable greater access to accessible natural greenspace but be unacceptable for other material planning reasons. For this reason, the proposed amendment to Policy COM11 is not supported.</p>

<p>Draft Policy COM11 states that <i>“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...”</i></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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</p>	<p><i>development proposals that enable the realisation of and greater accessibility to such space. In this respect, the following areas are specifically allocated...”</i></p>	
--	---	--

	<p>route and new access points would <i>“significantly improve the provision of public open space in the area.”</i></p> <p>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.</p> <p>We therefore believe that Draft Policy COM11 should say:</p> <p><i>“The Council will promote the provision of accessible, Natural and Semi-Natural Greenspace (including Amenity Green Space) wherever suitable opportunities arise, <b>including by supporting wider development proposals that enable the realisation of and greater accessibility to such space.</b> In this respect, the following areas are specifically allocated...”</i></p>		
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 with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations within the Deposit Plan progress.
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	<p>Comment noted</p> <p>The Deposit Plan has been underpinned by 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</p>

			<p>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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly</p>
287	Support - please see covering letter submitted	No changes proposed - support	Comments noted
308	<p><i>Policy SP6: Sustainable Housing Strategy</i> 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.</p> <p><i>Policy COM1: Housing Allocations</i> 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.</p> <p><i>Policy COM3: On-site Affordable Housing</i> 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.</p>	<p>To set a minimum housing requirement of 7,575 homes</p> <p>None – support Land West of Bridgend as a Strategic Allocation</p> <p>None – support area-wide and site-specific affordable housing policies</p>	<p>No action is considered necessary. The rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper and the support for the Growth Strategy is noted. 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. 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. As such, the total level of housing provision within the Deposit Plan is set appropriately to ensure delivery of the housing requirement. 7,575 homes is indeed the housing requirement.</p> <p>Comments noted.</p> <p>Comments noted.</p>

	<p><u>Summary</u> 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.</p>	None further to the above.	Comments noted.
400	<p>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.</p> <p><u>Summary</u> 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. 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.</p>	None – support the plan-wide and site-specific affordable housing targets within Maesteg and the Llynfi Valley.	Comments noted (refer to Plan-Wide Viability Assessment and site-specific viability assessments).
105 1	<p>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</p>	No changes proposed. Representor supports the allocation of Parc	Comments noted (refer to Candidate Site Assessment, Plan-Wide Viability Assessment and site-specific viability assessments).

<p>Proposals Map. The landowners maintain that their land forms an integral section to the COM1(1) allocation. With the imminent approval of the Section 73 Application the principle of up to 240 dwellings, including affordable, is accepted within the first phase 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.</p> <p>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.</p> <p><u>Summary</u></p> <p>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</p>	<p>Afon Ewenni (COM1(1)) and the area-wide and site-specific affordable housing policies.</p>	
--	---	--

	<p>principle of residential development at the 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.</p>		
253	<p>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.</p> <p>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)</p> <p>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</p>	<p>Proposal for COM2 to describe the affordable housing figure as a ‘target’ and merge with Policies COM 3, 4 and 5.</p> <p>Query why different area-specific and site-specific affordable housing policies are included in COM3.</p> <p>Query on what constitutes ‘an efficient and</p>	<p>No action is considered necessary. Policy COM2 is the Development Management policy to support delivery of the Strategic Policy 6 (SP6). The contribution the Replacement LDP can make to affordable housing provision has been robustly assessed through plan-wide and site-specific viability appraisals (refer to Plan-Wide Viability Assessment and the Affordable Housing Background Paper). SP6 has been formulated in accordance the wording detailed within paragraph 5.59 in the Development Plans Manual (Edition 3) and COM2 supports delivery of this key housing policy. The affordable housing provision is clearly identified as a target within supporting paragraph 5.3.22 of the Deposit Plan. No further revisions are therefore considered necessary on this basis.</p> <p>Whilst related, Policies COM 3, COM 4 and COM 5 provide criteria-based policies for on-site affordable housing provision, off-site affordable housing provision and affordable housing exception sites, respectively. More detailed policy coverage on these distinct forms of affordable housing provision is considered necessary in addition to COM2 and all of which support delivery of Strategic Policy 6 (SP6). As such, the proposal to merge the related policies is not supported.</p> <p>The rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. As outlined within the Development Plans Manual, “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. The two are not contradictory, rather the site specific being a refinement of the high level appraisal” (WG, 2020, para 5.89). Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council’s aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3.</p> <p>No action is considered necessary. The Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with Planning Policy Wales. COM6 seeks to achieve these principles by enabling mixed, socially inclusive, sustainable communities through a range of house types and sizes to meet the needs of residents at an efficient and appropriate density. Rather than specifying a</p>



<p>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</p>	<p>appropriate density’</p>	<p>numeric requirement, COM6 sets the framework to make the most efficient use of land based on site-specific context, thereby ensuring an appropriate balance of uses can be pursued in a manner that maximises the density of developments without compromising the quality of the living conditions provided.</p>
<p>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 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.</p>	<p>Query on how economic infrastructure and renewable energy can be secured as s106 requirements.</p>	<p>No action is considered necessary. Telecommunications and low carbon technology related infrastructure is and will become increasingly important over the Replacement LDP period with the lasting impacts of the pandemic and additional home working. Planning Policy Wales considers these forms of supporting infrastructure “crucial for economic, social and environmental sustainability” and stresses that “Infrastructure which is poorly designed or badly located can exacerbate problems rather than solving them” (para 3.61). SP10 therefore sets out the holistic requirement for all development proposals to be supported by sufficient existing or new infrastructure, ensuring such provision can be effectively co-ordinated to support the Plan. In order to mitigate likely adverse impacts and/or to integrate a development proposal with its surroundings, reasonable infrastructure provision or financial contributions to such infrastructure must be provided by developers where necessary. The policy wording states that “this will be secured by means of planning agreements/obligations where appropriate” and any such agreements will be subject to Community Infrastructure Levy Regulations and the Tests of Necessity. Therefore, whilst the representor’s comments are noted, the proposed policy wording of SP10 is considered appropriate in its current form.</p>
<p>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</p>	<p>Proposal for several non-strategic edge of settlement housing allocations</p>	<p>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.</p> <p>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.</p> <p>In terms of the proposal to place a greater reliance on small to medium sized greenfield sites, several sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infrastructure problems and it is 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.</p>
<p>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</p>	<p>Reduce Outdoor Sport and Recreation Facilities Requirements (COM10)</p>	<p>All new housing developments will be expected to include an appropriate level of outdoor recreation for public amenity purposes in the interest of Good Design. This is an integral means of delivering several Local Wellbeing Objectives, including to reduce social and economic inequalities and ensure healthy choice in a healthy environment. Contrary to the representor’s conclusion, COM10 is based on Fields in Trust recommended benchmark guidelines and allotment standards endorsed by the National Society of Allotment and Leisure Gardeners. The standards detailed within COM10 are not intended to represent minimum provision on all developments and the nature of contribution will be assessed on individual merits. As stated within COM10 itself, “provision of a satisfactory standard of outdoor recreation space is required on all new housing developments”</p>

	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 Outdoor Sport and Children’s Playspace Audit and Allotment Audit”. On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG. As such, the proposal to reduce the benchmark guidelines, below those recommended by Fields in Trust, is not supported.
170	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Remove reference to Place Plans within SP6</p> <p>Concern regarding the small and large windfall allowance</p> <p>Proposal to describe affordable housing requirement as a target within COM2.</p> <p>Query on site-specific affordable housing policies within COM3.</p>	<p>No action considered necessary. The reference to Place Plans within SP6 is in relation to the delivery of sites within defined settlement boundaries in accordance with all other policies in the Plan. As stated in SP6 itself, “there will be a presumption against housing development in all areas outside defined settlement boundaries, unless the proposal is considered an appropriate exceptional case as detailed in Development Management Policy COM5”. An Urban Capacity Study (2020) has also been prepared as a useful resource to developers and SMEs who are seeking to identify potential development opportunities within settlement boundaries that are not specifically allocated in the Replacement LDP.</p> <p>No action is considered necessary. An Urban Capacity Study (UCS, 2020) was published alongside the Deposit Plan to provide further analysis of the potential urban capacity of the County Boroughs’ settlements for housing to evidence the expected small and windfall site allowance rate. This UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this particular component of housing supply. It therefore demonstrates (in addition to past trends) that the small and windfall site allowance rate utilised in the Replacement LDP is both realistic and deliverable. It also serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP. Refer to the Housing Trajectory Background Paper.</p> <p>No action is considered necessary. Policy COM2 is the Development Management policy to support delivery of the Strategic Policy 6 (SP6). The contribution the Replacement LDP can make to affordable housing provision has been robustly assessed through plan-wide and site-specific viability appraisals (refer to Plan-Wide Viability Assessment and the Affordable Housing Background Paper). SP6 has been formulated in accordance the wording detailed within paragraph 5.59 in the Development Plans Manual (Edition 3) and COM2 supports delivery of this key housing policy. The affordable housing provision is clearly identified as a target within supporting paragraph 5.3.22 of the Deposit Plan. No further revisions are therefore considered necessary on this basis.</p> <p>Whilst related, Policies COM 3, COM 4 and COM 5 provide criteria-based policies for on-site affordable housing provision, off-site affordable housing provision and affordable housing exception sites, respectively. More detailed policy coverage on these distinct forms of affordable housing provision are considered necessary in addition to COM2 and all of which support delivery of Strategic Policy 6 (SP6). As such, the relationship between the related policies is considered clear.</p> <p>No action is considered necessary. The rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. As outlined within the Development Plans Manual, “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. The two are not contradictory, rather the site specific being a refinement of the high level appraisal” (WG, 2020, para 5.89). Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council’s aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3.</p>

	<p>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.</p> <p>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.</p>	<p>Query on what constitutes 'an efficient and appropriate density' within COM6.</p> <p>Query on including economic infrastructure and renewable energy requirements within SP10</p>	<p>No action is considered necessary. The Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with Planning Policy Wales. COM6 seeks to achieve these principles by enabling mixed, socially inclusive, sustainable communities through a range of house types and sizes to meet the needs of residents at an efficient and appropriate density. Rather than specifying a numeric requirement, COM6 sets the framework to make the most efficient use of land based on site-specific context, thereby ensuring an appropriate balance of uses can be pursued in a manner that maximises the density of developments without compromising the quality of the living conditions provided.</p> <p>Telecommunications and low carbon technology related infrastructure is and will become increasingly important over the Replacement LDP period with the lasting impacts of the pandemic and additional home working. Planning Policy Wales considers these forms of supporting infrastructure "crucial for economic, social and environmental sustainability" and stresses that "Infrastructure which is poorly designed or badly located can exacerbate problems rather than solving them" (para 3.61). SP10 therefore sets out the holistic requirement for all development proposals to be supported by sufficient existing or new infrastructure, ensuring such provision can be effectively co-ordinated to support the Plan. In order to mitigate likely adverse impacts and/or to integrate a development proposal with its surroundings, reasonable infrastructure provision or financial contributions to such infrastructure must be provided by developers where necessary. The policy wording states that "this will be secured by means of planning agreements/obligations where appropriate" and any such agreements will be subject to Community Infrastructure Levy Regulations and the Tests of Necessity. Therefore, whilst the representor's comments are noted, the proposed policy wording of SP10 is considered appropriate in its current form.</p>
1165	<p><b>General Influence of Constraints on mentioned site on Net Developable Area</b></p> <p>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.</p> <p>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</p>	<p>General concern raised regarding net developable area constraints</p> <p>Re-Allocate Porthcawl Waterfront as a Long-Term Regeneration Site, question the deliverability of</p>	<p>No action is considered necessary. A detailed plethora of evidence has been provided to the Council to support the delivery of the proposed allocations, including numerous site investigations and appraisals, constraints analysis and masterplans. This provides a high degree of certainty that the indicative densities are achievable on a site by site basis. As such, this generic comment is unsubstantiated and not supported.</p> <p>The proposal to allocate Land of Penprysg Road, Pencoed (87.C1) is not supported. The Candidate Site Assessment clearly states, "the candidate site is located on the periphery of Pencoed, which is identified as Sustainable Growth Area (as defined by SP1). There are highway issues associated with the site in addition to 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".</p>

	<p>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.</p> <p>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.</p>	<p>Land East of Pencoed and allocate candidate site 87.C1 - Land of Penprysg Road, Pencoed.</p> <p>Increase the flexibility of the Affordable Housing Exception Sites Policy</p>	<p>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. In summary therefore, the proposal to alter Porthcawl Waterfront to a Long-Term Regeneration Allocation is both unsubstantiated and not supported</p> <p>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 Meeting. As such, the concerns raised regarding Land South of Bridgend (Island Farm) trajectory are both unsubstantiated and not supported.</p> <p>Proposal not supported. As detailed within the Affordable Housing Background Paper, the Replacement LDP will seek to deliver the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. Promotion of significant levels of development in the countryside (affordable housing or otherwise) is not considered conducive to sustainable placemaking and will only be permitted in limited, exceptional circumstances to meet a pressing housing need. 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, 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 purposely small in scale and exceptional in circumstance.</p>
306	<p>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</p>	<p>Allocate Land adjoining Heol-Yr-Orsaf Kenfig Hill (Candidate Site Ref. 306.C1) and Land adjoining New Road, Kenfig Hill (Candidate Site Ref. 306.C2) as a means of</p>	<p>The LHMA 2021 drew upon a range of socioeconomic, demographic and property market data in order to provide detailed insights into the mechanics of the local housing markets in accordance with Welsh Government Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenure mix and house types) to be calculated and extrapolated over the Replacement LDP period. The LHMA forms a core piece of baseline evidence that has influenced the scale, type and location of growth within the Replacement LDP. However, and contrary to the representor's statement, it is inaccurate to claim that the need for affordable housing has "increased" since the 2019/20 LHMA, as each LHMA represents a snapshot at a point in time in accordance with Welsh Government Guidance.</p>

<p>sums. The LHMA (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 assessment period, based on the assumption that the existing backlog will be cleared during these five years. A further annual need of 288 affordable units has also been identified for the remaining 10 years of the LDP period. In comparison with the 2019/20 LHMA which identified a need of 411 affordable units per annum over the next five years, this is an increase in the overall affordable housing need for the County Borough. 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 9207 new homes, including 1977 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 (2013/4-2018/19) which witnessed sustainable population growth as well as completions across the County Borough. In comparison with the LHMA, this identified need of 1977 homes falls exceedingly short of the 5134 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 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</p>	<p>boosting affordable housing supply</p>	<p>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 the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). The Plan's contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents 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 a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the level of housing need within the County Borough, which the Council will seek to address through a range of market interventions as far as practically deliverable. These complementary sources of supply include, although are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.</p> <p>The proposal to allocate Land adjoining Heol-Yr-Orsaf Kenfig Hill (Candidate Site Ref. 306.C1) and Land adjoining New Road, Kenfig Hill (Candidate Site Ref. 306.C2) as a means of boosting affordable housing supply is not supported. As clearly explained in the Candidate Site Assessment, 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.</p> <p>For the avoidance of any doubt, the represntor submitted some uncorroborated high level viability inputs to the Council, although no comprehensive viability assessment was provided for either site. The Council wrote to all Stage 2 Candidate Site promoters on 21<sup>st</sup> August 2020 to remind site promoters 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, and the representor's claims to the contrary, no detailed viability appraisal (using the DVM or otherwise) was submitted to the Council to demonstrate that either site is viable or deliverable. The proposal to allocate both sites is therefore not supported.</p>
--	---	--

	<p>contribution to the affordable housing stock, must be taken into account.</p> <p>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</p>		
222	<p><u>Range of Housing Allocations Edge of Settlement</u></p> <p><u>Policy SP6: Sustainable Housing Strategy</u>  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</p>	<p>Agree with the growth and spatial strategy</p>	<p>Comments noted (Refer to Growth Options Background Paper, Spatial Strategy Options Background Paper, Housing Trajectory Background Paper and Candidate Site Assessment).</p>

<p>Heol Fach at North Cornelly to deliver sustainable housing.</p>	<p>Allocate Land at Heol Fach, North Cornelly</p>	<p>The representor has submitted a comprehensive viability assessment for Land at Heol Fach, North Cornelly. Therefore, demonstrating that the site is viable and deliverable.</p>
<p><u>Policy COM1: Housing Allocations</u> In order to deliver the housing strategy outlined in Policy SP6, Bellway consider the land at Heol Fach should be allocated as a housing allocation under Policy COM1 not only because it is a logical, sustainable location for growth, but its potential to fulfil a housing shortfall if Land East of Pyle is not allocated or experiences delays in delivery due to landownership issues, the technical flaws identified with the Sustainability Appraisal and highway concerns detailed elsewhere within Bellway's representations. The allocation of land at Heol Fach is developer led, viable and capable of being delivered within the first five years of the plan period which is a quicker delivery timescale compared to the strategic sites and housing allocations currently identified under Policy COM1.</p>	<p>Clarify the Plan's affordable housing contribution and allocate Land at Heol Fach, North Cornelly to deliver an additional 38 affordable dwellings</p>	<p>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 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.</p>
<p>It is also noted that Policy COM1 provides 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 affordable units will be provided within the RLDP period this certainty should be reflected in Policy PLA5 to ensure all 300 affordable units are delivered within in the RLDP period. In addition, it is noted that the Local Housing Market Assessment (2021) identified a total affordable housing need of 5,134 dwellings. Table 15 identifies a total need of 706.10 dwellings for Pyle, Kenfig and Cornelly Housing Market Area. In light of the total need identified within the LHMA compared against the proposed 300 affordable units it is not clear where the remainder 406 affordable dwellings are going to be provided to meet the affordable housing need identified in the Council's evidence base. Bellway confirm that the allocation of</p>	<p>Clarify the Plan's affordable housing contribution and allocate Land at Heol Fach, North Cornelly to deliver an additional 38 affordable dwellings</p>	<p>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 the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). The Plan's contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents 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 a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the level of housing need within the County Borough, which the Council will seek to address through a range of market interventions as far as practically deliverable. These complementary sources of supply include, although are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.</p>
<p>It is also noted that Policy COM1 provides 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 affordable units will be provided within the RLDP period this certainty should be reflected in Policy PLA5 to ensure all 300 affordable units are delivered within in the RLDP period. In addition, it is noted that the Local Housing Market Assessment (2021) identified a total affordable housing need of 5,134 dwellings. Table 15 identifies a total need of 706.10 dwellings for Pyle, Kenfig and Cornelly Housing Market Area. In light of the total need identified within the LHMA compared against the proposed 300 affordable units it is not clear where the remainder 406 affordable dwellings are going to be provided to meet the affordable housing need identified in the Council's evidence base. Bellway confirm that the allocation of</p>	<p>Clarify the Plan's affordable housing contribution and allocate Land at Heol Fach, North Cornelly to deliver an additional 38 affordable dwellings</p>	<p>Table 3 within the Affordable Housing Background Paper clearly states that the 300 affordable units are earmarked for delivery within the Replacement LDP period. These units have been incorporated into the Replacement LDP affordable housing target. The delivery phasing would be secured through a future s106 agreement. The following Thematic Policies (PLA1-PLA5) detail the site-specific requirements for the mixed-use Strategic Development Sites in Regeneration Growth Areas and Sustainable Growth Areas. These detailed Thematic Policies are set within the context of SP3 and will enable its implementation, in accordance with the Growth and Spatial Strategy identified within SP1 and Strategic Allocations identified within SP2. As such, no further policy changes are considered necessary in the context of the affordable housing delivery target.</p>

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

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

Support 15% affordable housing target for Land East of Pyle

De-allocate Land East of Pyle and allocate Land at Heol Fach, North Cornelly

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 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 rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. As outlined within the Development Plans Manual, "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. The two are not contradictory, rather the site specific being a refinement of the high level appraisal" (WG, 2020, para 5.89). Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council's aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3, including 15% on-site at Land East of Pyle (SP2(5)).

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. All landowners are committed to working towards ensuring a development site that can be delivered as a comprehensive development. 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 representor's concerns are both unsubstantiated and not supported.

The rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper and the support for the Growth Strategy is noted. 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



	<p>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.</p>		<p>throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur.</p> <p>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 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.</p>
221	<p><u>Affordable Homes</u> 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 2021. 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</p>	<p>Allocate Land at Broadlands, 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.</p>	<p>The LHMA 2021 drew upon a range of socioeconomic, demographic and property market data in order to provide detailed insights into the mechanics of the local housing markets in accordance with Welsh Government Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenure mix and house types) to be calculated and extrapolated over the Replacement LDP period. The LHMA forms a core piece of baseline evidence that has influenced the scale, type and location of growth within the Replacement LDP. However, the representor's claim that the need identified by the LHMA over the plan period (5,134 affordable homes) is the 'target' for delivery is factually inaccurate.</p> <p>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 the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). The Plan's contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents 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 a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the level of housing need within the County Borough, which the Council will seek to address through a range of market interventions as far as practically deliverable. These complementary sources of supply include, although are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.</p> <p>As also detailed within the Affordable Housing Background Paper, the Replacement LDP will seek to deliver the identified affordable housing target (i.e. 1,977 affordable homes) within the designated settlement boundaries in accordance with placemaking principles.</p> <p>The proposal to allocate Broadlands, Bridgend (221.C1), Land south of Coychurch, Bridgend (221.C3) and Zig Zag Lane, Porthcawl (221.C2) as a means of boosting affordable housing supply is therefore not supported.</p>

<p>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.</p> <p>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.</p> <p>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:</p> <p>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).</p>		<p>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.</p> <p>In relation to Broadlands (Candidate Site Ref: 221.C1) specifically, the Assessment states,</p> <p>“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”.</p> <p>In relation to Land South of Coychurch (Candidate Site Ref: 221.C3) specifically, the Assessment states,</p> <p>“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”.</p> <p>In relation to Zig Zag Lane (Candidate Site Ref: 221.C2) specifically, the Assessment states,</p> <p>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.</p> <p>Whilst the Council notes the representor’s proposals to include these three sites within the Replacement LDP, these proposals are not supported for the reasons outlined above.</p>
--	--	---

<p>Land south of Coychurch, Bridgend (221.C3): 77 affordable homes (based on the 15% affordable homes rate within the Bridgend housing market area).</p> <p>Zig Zag Lane, Porthcawl (221.C2): 133 affordable homes at (based on the 30% affordable homes rate within the Porthcawl housing market area).</p>		
<p>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</p>	<p>Support COM3 area-based and site-specific affordable housing thresholds</p>	<p>Comments noted.</p>
<p><u>Flexibility Allowance</u> The flexibility allowance in terms of housing numbers is to be included in a Plan to ensure it will remain effective in the event of changing circumstance such as non-delivery of key sites and/ or other unforeseen issues. The Development Plan Manual (Edition 3) (March 2020) indicates that a 10% flexibility allowance should be the starting point in terms of housing provision (housing requirement plus flexibility). It is acknowledged that LDPs across Wales apply higher and lower allowances, however Persimmon Homes West Wales are of the view that the appropriate rate should be set based on local circumstances. In view of the Council's significant reliance on strategic and large sites, a greater level of flexibility should be allowed for in the Plan to increase the chance of meeting the housing needs of the County Borough. Such a flexibility allowance will assist in overcoming uncertainties regarding housing deliverability and viability. In view of the above, the 20% flexibility allowance set out in Deposit Policy SP1 (Regeneration and Sustainable Growth Strategy) is deemed to be a sensible approach, given the risk of non-delivery of the housing requirement within the Plan Period due to fewer larger sites allocations. Notwithstanding this, it is not considered the 20% flexibility should be</p>	<p>Support 20% flexibility allowance</p>	<p>Comments noted. An appropriate flexibility allowance (10%) has been embedded into the Deposit Plan and the basis for which is 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.</p>

<p>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</p>			
<p><u>Supporting Evidence Base to Site Allocations</u></p> <p>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 place....Having 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.</p> <p>Soundness: The Deposit Plan as currently drafted fails Test 2 and 3 in terms of the lack of publication of a robust and credible</p>	<p>Publish the candidate sites evidence base associated with the proposed housing allocations and the 'Key Supporting Information' documents referenced in the Deposit Plan, prior to the submission of the Plan for examination</p>		<p>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. Key supporting information for each proposed allocation will be made available at the examination.</p>

	<p>evidence base to demonstrate compliance.</p> <p>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 submission of the Plan for examination.</u></p>		
	<p><u>Independent Financial Viability Appraisals</u></p> <p>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).</p>	<p>None – viability assessments submitted for Broadlands (221.C1) and Land South of Coychurch (221.C3)</p>	<p>Comments noted.</p>
	<p><u>Flood Risk</u></p> <p>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</p>	<p>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.</p>	<p>Comments noted. Supporting information will be published prior to examination, including a Focussed Changes Consultation if necessary.</p>

	<p>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.</p> <p>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.</p> <p>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.</p>		
	<p><u>Policy COM6 (Residential Density)</u> 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.</p>	<p>Proposal for COM6 to provide a clear understanding of the densities appropriate within differing locations in the County Borough.</p>	<p>No action is considered necessary. The Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with Planning Policy Wales. COM6 seeks to achieve these principles by enabling mixed, socially inclusive, sustainable communities through a range of house types and sizes to meet the needs of residents at an efficient and appropriate density. Rather than specifying a numeric requirement, COM6 sets the framework to make the most efficient use of land based on site-specific context, thereby ensuring an appropriate balance of uses can be pursued in a manner that maximises the density of developments without compromising the quality of the living conditions provided.</p>
	<p><u>Policy SP8 (Health &amp; Well-being)</u> The policy wording calls for a Health Impact Assessment (HIA) all new major development (i.e. 10 dwellings or more). Whilst Persimmon Homes West Wales support the principle of the requirement an HIA for strategic site development, it is considered a more appropriate threshold for residential development would be 500 dwellings or more. It is considered the requirement of a HIA for schemes of 10 dwellings and below is an onerous requirement. The revised policy wording</p>	<p>Proposal to change SP8 to increase the threshold for a Health Impact Assessment</p>	<p>No action is considered necessary. SP8 reflects the direction in National Planning Policy and Guidance that health can be a material consideration in determining planning applications for new developments, and is increasingly recognised as an essential element of delivering sustainable development. As stated in Edition 11 of Planning Policy Wales, "Health Impact Assessment makes a valuable contribution towards plan making. It may be useful when proposing or making decisions on new development along with evidence collected by Public Service Boards. Evidence on health impacts can help the planning system develop stronger and more coherent approaches towards maximising health and well-being" (para 3.24). The representor's proposal to significantly increase the threshold for a HIA is therefore not justified and not supported.</p>

	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	<p>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.</p> <p>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</p>	Object to the 10 unit ‘cap’ within the Affordable Housing Exception Sites Policy (COM5) and request the removal of any dwelling limit	<p>No action is considered necessary. As clearly stated in the Affordable Housing Background Paper, the Replacement LDP directs the majority of growth towards areas that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided, in order to facilitate sustainable placemaking. Development of land within or on the periphery of urban areas is therefore prioritised, especially on previously developed ‘brownfield’ sites. Whilst the Council expects the majority of development to take place 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 in this manner. The Replacement LDP therefore includes an affordable housing exception policy, which is an exception to the general housing provision policies that do not otherwise permit new housing within or outside settlement boundaries. However, any resultant development 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 and comprise of no more than 10 affordable units. This is considered to be the appropriate maximum size for a sustainable cluster of affordable housing as required on larger housing developments and is therefore equally applicable to an exception site. Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities.</p> <p>The representor has quoted a number of extracts from national planning policy, all of which were duly considered by the Council in setting an appropriate affordable housing target within the Replacement LDP (refer to the Affordable Housing Background Paper). Indeed, the Replacement LDP Strategy is considered most conducive to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales’ placemaking principles, whilst maximising affordable housing delivery in high-need areas. However, without exception, none of the extracts of national policy quoted by the representor justify unrestricted affordable development that would otherwise be unacceptable within or adjoining existing settlements. No policy based justification has been provided to alter the limit or capping of 10 dwellings within the affordable housing exception sites policy.</p> <p>The representor has also summarised the policy context in certain other Local Authorities and suggested that “the flexibility of the quantum [of affordable housing within certain exception site policies] has been key to the delivery of such sites”, whilst emphasising the fact that some of these policies have “made a significant contribution towards meeting the affordable housing need”. However, in all cases, these policies have been developed to address locally identified needs, viability and different geographical contexts. Moreover, the Council considers that the representor has misinterpreted the purpose of the proposed COM5 Affordable Housing Exception Sites Policy, which will now be reiterated for ease of reference.</p> <p>The LHMA 2021 drew upon a range of socioeconomic, demographic and property market data in order to provide detailed insights into the mechanics of the local housing markets in accordance with Welsh Government</p>

<p>Paragraph 5.3.34 of the amplification text which is where an objection is raised.</p> <p>Paragraph 5.3.34 states – “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 uncondusive to the delivery and maintenance of balanced, mixed tenure communities and will therefore not be in accordance with COM5.” The boldened text above is primary source of the objection i.e. the ‘capping’ of affordable housing exception sites to no more than 10 units. The reasons for these objections are provided in greater detail in the next section.</p> <p><u>Material Considerations</u></p> <p>Firstly, and as above it should be noted that Coastal support the Affordable Housing provisions as set out in the LDP Deposit Plan under Policy COM5, the objection is solely with the limit or capping of 10 dwellings on the exception site.</p> <p><u>National Planning Policy – PPW 11</u></p> <p>Planning Policy Wales (PPW) 11 considers good quality, affordable homes to be the “foundation of living well which brings a wide range of benefits to health, learning and prosperity.” For this reason, it is essential that policy is able to provide a sustainable and appropriate mechanism to deliver balanced communities in appropriate locations.</p> <p>PPW 11 agrees that “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.”</p>		<p>Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenure mix and house types) to be calculated and extrapolated over the Replacement LDP period. The LHMA forms a core piece of baseline evidence to influence the scale, type and location of growth within the Replacement LDP. However, the different levels of need for affordable housing identified within each Housing Market Area cannot be considered ‘targets’ as incorrectly alluded to by the representor. As clearly stated in National LHMA Guidance, “the ‘headline’ housing need figure calculated by this approach should not be used as a definitive measure of need or as a target figure. Rather it should be used to improve the scale of local housing need” (para. 9, 2014).</p> <p>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 the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). The Plan’s contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents 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 a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the level of housing need within the County Borough, which the Council will seek to address through a range of market interventions as far as practically deliverable. These complementary sources of supply include, although are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.</p> <p>As also detailed within the Affordable Housing Background Paper, the Replacement LDP will seek to deliver the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. COM5 does not seek to promote significant levels of affordable housing development that would otherwise be out of accord with the Plan, rather, provide a mechanism to meet a pressing housing need in limited, exceptional circumstances. 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, 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 purposely small in scale and exceptional in circumstance. Therefore, the representor’s statement, “in order for the LPA to meet the identified affordable housing need, a flexible Affordable Housing Exception Sites is required” is factually incorrect.</p> <p>As paragraph 5.3.33 of the Deposit Plan states, “Whilst the Council expects the majority of development to take place within the defined settlement boundaries, COM5 recognises that certain area specific factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery in this manner. COM5 is therefore an exception to the general housing provision policies of the LDP, which do not otherwise permit new housing outside settlement boundaries”. Therefore, an exception policy for small sites to come forward would facilitate these aims, acknowledging that 10 units is an appropriate size for a sustainable cluster of affordable units. This is considered to be of an appropriate scale as detailed in paragraph 5.3.35 of the Deposit Plan, in recognition of the fact that larger sites can otherwise become increasingly uncondusive to the delivery and maintenance of a balanced, mixed tenure community. It should be emphasised that individual clusters of 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 sites.</p> <p>Ultimately, and contrary to the representor’s views, proposed Policy COM5 is not intended to provide a framework to secure a significant contribution to affordable housing supply. The Council has proactively sought</p>
--	--	---



<p>In respect of affordable housing, Paragraph 4.2.2 states: “the planning 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.”</p> <p>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.”</p> <p>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.”</p> <p>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</p>		<p>to introduce this policy into the Replacement Plan as a means of meeting very specific housing need in exceptional instances. The Plan seeks to prioritise delivery of affordable housing within the designated settlement boundaries in accordance with placemaking principles. None of the arguments posed by the representor are considered sound justification to remove the 10 affordable unit limit proposed for exception sites. The representor’s proposal is therefore not supported.</p>
---	--	---

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 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;
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 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.

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;
- 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, 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.

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



	<p>opportunity in being a delivery partner in the Town Centre of Bridgend.</p> <p><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.</p> <p>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.</p>		
162	<p>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</p>	<p>Object to the 10 unit 'cap' within the Affordable Housing Exception Sites Policy (COM5) and request the</p>	<p>No action is considered necessary. As clearly stated in the Affordable Housing Background Paper, the Replacement LDP directs the majority of growth towards areas that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided, in order to facilitate sustainable placemaking. Development of land within or on the periphery of urban areas is therefore prioritised, especially on previously developed 'brownfield' sites. Whilst the Council expects the majority of development to take place 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 in this manner. The Replacement LDP therefore includes an affordable housing exception policy, which is an</p>

<p>(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.</p> <p>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. Valleys to Coast 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 Paragraph 5.3.34 of the amplification text which is where an objection is raised.</p> <p>Paragraph 5.3.34 states – “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 uncondusive to the delivery and maintenance of balanced, mixed tenure communities and will therefore not be in accordance with COM5.” The boldened text above is primary source of the objection i.e. the ‘capping’ of affordable housing exception sites to no more than 10 units. The reasons for these objections are provided in greater detail in the next section.</p>	<p>removal of any dwelling limit</p>	<p>exception to the general housing provision policies that do not otherwise permit new housing within or outside settlement boundaries. However, any resultant development 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 and comprise of no more than 10 affordable units. This is considered to be the appropriate maximum size for a sustainable cluster of affordable housing as required on larger housing developments and is therefore equally applicable to an exception site. Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities.</p> <p>The representor has quoted a number of extracts from national planning policy, all of which were duly considered by the Council in setting an appropriate affordable housing target within the Replacement LDP (refer to the Affordable Housing Background Paper). Indeed, the Replacement LDP Strategy is considered most conducive to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales’ placemaking principles, whilst maximising affordable housing delivery in high-need areas. However, without exception, none of the extracts of national policy quoted by the representor justify unrestricted affordable development that would otherwise be unacceptable within or adjoining existing settlements. No policy based justification has been provided to alter the limit or capping of 10 dwellings within the affordable housing exception sites policy.</p> <p>The representor has also summarised the policy context in certain other Local Authorities and suggested that “the flexibility of the quantum [of affordable housing within certain exception site policies] has been key to the delivery of such sites”, whilst emphasising the fact that some of these policies have “made a significant contribution towards meeting the affordable housing need”. However, in all cases, these policies have been developed to address locally identified needs, viability and different geographical contexts. Moreover, the Council considers that the representor has misinterpreted the purpose of the proposed COM5 Affordable Housing Exception Sites Policy, which will now be reiterated for ease of reference.</p> <p>The LHMA 2021 drew upon a range of socioeconomic, demographic and property market data in order to provide detailed insights into the mechanics of the local housing markets in accordance with Welsh Government Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenure mix and house types) to be calculated and extrapolated over the Replacement LDP period. The LHMA forms a core piece of baseline evidence to influence the scale, type and location of growth within the Replacement LDP. However, the different levels of need for affordable housing identified within each Housing Market Area cannot be considered ‘targets’ as incorrectly alluded to by the representor. As clearly stated in National LHMA Guidance, “the ‘headline’ housing need figure calculated by this approach should not be used as a definitive measure of need or as a target figure. Rather it should be used to improve the scale of local housing need” (para. 9, 2014).</p> <p>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 the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). The Plan’s contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents 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 a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the level of housing need within the County Borough, which the Council will seek to address through a range of market interventions as far as practically deliverable. These complementary sources of supply include, although</p>
---	--------------------------------------	--

<p><u>Material Considerations</u>  Firstly, and as above it should be noted that Valleys to Coast support the Affordable Housing provisions as set out in the LDP Deposit Plan under Policy COM5, the objection is solely with the limit or capping of 10 dwellings on the exception site.</p> <p><u>National Planning Policy – PPW 11</u></p> <p>Planning Policy Wales (PPW) 11 considers good quality, affordable homes to be the “foundation of living well which brings a wide range of benefits to health, learning and prosperity.” For this reason, it is essential that policy is able to provide a sustainable and appropriate mechanism to deliver balanced communities in appropriate locations.</p> <p>PPW 11 agrees that “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.”</p> <p>In respect of affordable housing, Paragraph 4.2.2 states: “the planning 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.”</p> <p>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</p>		<p>are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.</p> <p>As also detailed within the Affordable Housing Background Paper, the Replacement LDP will seek to deliver the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. COM5 does not seek to promote significant levels of affordable housing development that would otherwise be out of accord with the Plan, rather, provide a mechanism to meet a pressing housing need in 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, 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 purposely small in scale and exceptional in circumstance. Therefore, the representor’s statement, “in order for the LPA to meet the identified affordable housing need, a flexible Affordable Housing Exception Sites is required” is factually incorrect.</p> <p>As paragraph 5.3.33 of the Deposit Plan states, “Whilst the Council expects the majority of development to take place within the defined settlement boundaries, COM5 recognises that certain area specific factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery in this manner. COM5 is therefore an exception to the general housing provision policies of the LDP, which do not otherwise permit new housing outside settlement boundaries”. Therefore, an exception policy for small sites to come forward would facilitate these aims, acknowledging that 10 units is an appropriate size for a sustainable cluster of affordable units. This is considered to be of an appropriate scale as detailed in paragraph 5.3.35 of the Deposit Plan, in recognition of the fact that larger sites can otherwise become increasingly uncondusive to the delivery and maintenance of a balanced, mixed tenure community. It should be emphasised that individual clusters of 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 sites.</p> <p>Ultimately, and contrary to the representor’s views, proposed Policy COM5 is not intended to provide a framework to secure a significant contribution to affordable housing supply. The Council has proactively sought to introduce this policy into the Replacement Plan as a means of meeting very specific housing need in exceptional instances. The Plan seeks to prioritise delivery of affordable housing within the designated settlement boundaries in accordance with placemaking principles. None of the arguments posed by the representor are considered sound justification to remove the 10 affordable unit limit proposed for exception sites. The representor’s proposal is therefore not supported.</p>
---	--	---

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 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;
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 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



<p>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:</p> <p>“Affordable housing sites within or adjoining the Plan’s Centres will be permitted where it can be demonstrated that:</p> <ul style="list-style-type: none"><li>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</li><li>b) A genuine need for affordable housing has been identified; and</li><li>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.”</li></ul> <p>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.</p> <p><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:</p> <p>“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:</p> <ul style="list-style-type: none"><li>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;</li></ul>		
---	--	--

- 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, 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 NPTC has a similar restriction on the number of dwellings

	<p>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.</p> <p>Therefore, flexibility is welcomed within the policy wording to ensure no 'cap' is imposed within the policy text.</p> <p><b>Summary</b></p> <p>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.</p>		
394	<p>Within the Bridgend Deposit Plan Consultation, Strategic Objectives have been identified to reflect on key issues, align with national policy and to ensure an</p>	<p>Object to the 10 unit 'cap' within the Affordable Housing</p>	<p>No action is considered necessary. As clearly stated in the Affordable Housing Background Paper, the Replacement LDP directs the majority of growth towards areas that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided, in order to facilitate sustainable placemaking. Development of land within or on the periphery of urban areas is therefore prioritised, especially</p>

<p>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.</p> <p>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. Pobl 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 Paragraph 5.3.34 of the amplification text which is where an objection is raised.</p> <p>Paragraph 5.3.34 states – “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 uncondusive to the delivery and maintenance of balanced, mixed tenure communities and will therefore not be in accordance with COM5.” The boldened text above is primary source of the objection i.e. the ‘capping’ of affordable housing exception sites to no more than 10</p>	<p>Exception Sites Policy (COM5) and request the removal of any dwelling limit</p>	<p>on previously developed ‘brownfield’ sites. Whilst the Council expects the majority of development to take place 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 in this manner. The Replacement LDP therefore includes an affordable housing exception policy, which is an exception to the general housing provision policies that do not otherwise permit new housing within or outside settlement boundaries. However, any resultant development 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 and comprise of no more than 10 affordable units. This is considered to be the appropriate maximum size for a sustainable cluster of affordable housing as required on larger housing developments and is therefore equally applicable to an exception site. Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities.</p> <p>The representor has quoted a number of extracts from national planning policy, all of which were duly considered by the Council in setting an appropriate affordable housing target within the Replacement LDP (refer to the Affordable Housing Background Paper). Indeed, the Replacement LDP Strategy is considered most conducive to accommodating the level of growth identified in the Strategic Growth Options Background Paper and also delivering this growth through sustainable patterns of development that accord with the Planning Policy Wales’ placemaking principles, whilst maximising affordable housing delivery in high-need areas. However, without exception, none of the extracts of national policy quoted by the representor justify unrestricted affordable development that would otherwise be unacceptable within or adjoining existing settlements. No policy based justification has been provided to alter the limit or capping of 10 dwellings within the affordable housing exception sites policy.</p> <p>The representor has also summarised the policy context in certain other Local Authorities and suggested that “the flexibility of the quantum [of affordable housing within certain exception site policies] has been key to the delivery of such sites”, whilst emphasising the fact that some of these policies have “made a significant contribution towards meeting the affordable housing need”. However, in all cases, these policies have been developed to address locally identified needs, viability and different geographical contexts. Moreover, the Council considers that the representor has misinterpreted the purpose of the proposed COM5 Affordable Housing Exception Sites Policy, which will now be reiterated for ease of reference.</p> <p>The LHMA 2021 drew upon a range of socioeconomic, demographic and property market data in order to provide detailed insights into the mechanics of the local housing markets in accordance with Welsh Government Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenure mix and house types) to be calculated and extrapolated over the Replacement LDP period. The LHMA forms a core piece of baseline evidence to influence the scale, type and location of growth within the Replacement LDP. However, the different levels of need for affordable housing identified within each Housing Market Area cannot be considered ‘targets’ as incorrectly alluded to by the representor. As clearly stated in National LHMA Guidance, “the ‘headline’ housing need figure calculated by this approach should not be used as a definitive measure of need or as a target figure. Rather it should be used to improve the scale of local housing need” (para. 9, 2014).</p> <p>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 the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). The Plan’s contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents the scale of the affordability gap in the market and the LDP itself is not the only affordable housing delivery</p>
--	--	--

<p>units. The reasons for these objections are provided in greater detail in the next section.</p> <p><u>Material Considerations</u>  Firstly, and as above it should be noted that Pobl support the Affordable Housing provisions as set out in the LDP Deposit Plan under Policy COM5, the objection is solely with the limit or capping of 10 dwellings on the exception site.</p> <p><u>National Planning Policy – PPW 11</u>  Planning Policy Wales (PPW) 11 considers good quality, affordable homes to be the “foundation of living well which brings a wide range of benefits to health, learning and prosperity.” For this reason, it is essential that policy is able to provide a sustainable and appropriate mechanism to deliver balanced communities in appropriate locations.</p> <p>PPW 11 agrees that “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.”</p> <p>In respect of affordable housing, Paragraph 4.2.2 states: “the planning 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.”</p> <p>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</p>		<p>mechanism to help address it. The LHMA itself clarifies that this headline need figure should not be considered a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the level of housing need within the County Borough, which the Council will seek to address through a range of market interventions as far as practically deliverable. These complementary sources of supply include, although are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.</p> <p>As also detailed within the Affordable Housing Background Paper, the Replacement LDP will seek to deliver the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. COM5 does not seek to promote significant levels of affordable housing development that would otherwise be out of accord with the Plan, rather, provide a mechanism to meet a pressing housing need in 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, 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 purposely small in scale and exceptional in circumstance. Therefore, the representor’s statement, “in order for the LPA to meet the identified affordable housing need, a flexible Affordable Housing Exception Sites is required” is factually incorrect.</p> <p>As paragraph 5.3.33 of the Deposit Plan states, “Whilst the Council expects the majority of development to take place within the defined settlement boundaries, COM5 recognises that certain area specific factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery in this manner. COM5 is therefore an exception to the general housing provision policies of the LDP, which do not otherwise permit new housing outside settlement boundaries”. Therefore, an exception policy for small sites to come forward would facilitate these aims, acknowledging that 10 units is an appropriate size for a sustainable cluster of affordable units. This is considered to be of an appropriate scale as detailed in paragraph 5.3.35 of the Deposit Plan, in recognition of the fact that larger sites can otherwise become increasingly uncondusive to the delivery and maintenance of a balanced, mixed tenure community. It should be emphasised that individual clusters of 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 sites.</p> <p>Ultimately, and contrary to the representor’s views, proposed Policy COM5 is not intended to provide a framework to secure a significant contribution to affordable housing supply. The Council has proactively sought to introduce this policy into the Replacement Plan as a means of meeting very specific housing need in exceptional instances. The Plan seeks to prioritise delivery of affordable housing within the designated settlement boundaries in accordance with placemaking principles. None of the arguments posed by the representor are considered sound justification to remove the 10 affordable unit limit proposed for exception sites. The representor’s proposal is therefore not supported.</p>
--	--	---

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 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;
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 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.

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;

- 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

	<p>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.</p> <p>Therefore, flexibility is welcomed within the policy wording to ensure no 'cap' is imposed within the policy text.</p> <p><b>Summary</b></p> <p>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.</p>		
1140	<p>The Bridgend Deposit Local Development Plan (LDP) was published for consultation on 1st June 2021. The statutory consultation period runs for 8 weeks (closing on 27th July). The Deposit LDP is</p>	<p>Proposal to remove reference to any number of dwellings from Policy COM5</p>	<p>No action is considered necessary. As clearly stated in the Affordable Housing Background Paper, the Replacement LDP directs the majority of growth towards areas that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided, in order to facilitate sustainable placemaking. Development of land within or on the periphery of urban areas is therefore prioritised, especially on previously developed 'brownfield' sites. Whilst the Council expects the majority of development to take place</p>

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

<p>housing, including setting development plan targets based on regional estimates of housing need and local assessments.</p> <p>Planning Policy Wales 11 (PPW11) was also published by the WG in February 2021. Paragraph 4.2.34 of PPW11 confirms 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 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, such as the national sustainable placemaking outcomes. Affordable housing exception sites are not appropriate for market housing.”</p> <p>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.</p>		<p>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, 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 purposely small in scale and exceptional in circumstance.</p> <p>As paragraph 5.3.33 of the Deposit Plan states, “Whilst the Council expects the majority of development to take place within the defined settlement boundaries, COM5 recognises that certain area specific factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery in this manner. COM5 is therefore an exception to the general housing provision policies of the LDP, which do not otherwise permit new housing outside settlement boundaries”. Therefore, an exception policy for small sites to come forward would facilitate these aims, acknowledging that 10 units is an appropriate size for a sustainable cluster of affordable units. This is considered to be of an appropriate scale as detailed in paragraph 5.3.35 of the Deposit Plan, in recognition of the fact that larger sites can otherwise become increasingly uncondusive to the delivery and maintenance of a balanced, mixed tenure community. It should be emphasised that individual clusters of 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 sites.</p> <p>The Council has proactively sought to introduce this policy into the Replacement Plan as a means of meeting very specific housing need in exceptional instances. The Plan seeks to prioritise delivery of affordable housing within the designated settlement boundaries in accordance with placemaking principles. None of the arguments posed by the representor are considered sound justification to remove the 10 affordable unit limit proposed for exception sites. The representor’s proposal is therefore not supported.</p>
--	--	--

<p>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</p>		
<p>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 uncondusive to the delivery and maintenance of balanced, mixed tenure communities'</p>		



	<p>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 references 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 tests 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 facilities 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.</p>		
399	<p><u>Rolled Over Housing Sites</u></p> <p>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:</p> <ul style="list-style-type: none"> <li>• SP2 (1) Porthcawl Waterfront 1,020 Units</li> <li>• COM1 (1) Parc Afon Ewenni 675 Units</li> </ul> <p>The total number of units to be delivered on rolled-over sites amounts to 1,695 dwellings, and therefore forms a</p>	<p>Concerns regarding re-allocation of extant brownfield allocations</p>	<p>Two existing large scale brownfield regeneration sites have been proposed for re-allocation (Parc Afon Ewenni and Porthcawl Waterfront) within the Replacement LDP, both of which are considered deliverable components of housing supply to enable delivery of the housing requirement. Before being 'rolled forward' into the Deposit Plan, both sites were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. In both cases, there has been a substantial change in circumstances to demonstrate the sites can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment).</p> <p>In addition to the two aforementioned 'rollover' sites incorporated within the New Housing Allocations Component of supply, there are also three brownfield regeneration allocations within the existing LDP that the Council intends to re-allocate as Long-Term Regeneration Sites. These include Maesteg Washery, Coegnant Reclamation Site (Caerau) and the Former Cooper Standard Site, Ewenny Road (Maesteg). The retention of such sites represents a necessary degree of continuity with the first adopted LDP, which is essential to implement the long-term regeneration strategy embodied within the Replacement LDP Vision. However, for the avoidance of doubt, and in accordance with national policy, these Long-Term Regeneration Sites are not included as a component of housing supply. The housing land supply will therefore not be dependent on their delivery, in recognition of the fact that they require longer lead-in times, preparatory remediation-based enabling works and/or more detailed strategic master plans before they can come forward. Whilst Long-Term Regeneration sites will still be allocated in the plan to enable their delivery, they will not be relied upon as contributing to the housing requirement and will also not be included in the windfall allowance. They are essentially 'bonus sites', notwithstanding the fact that</p>

<p>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.”</p> <p>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.</p>		<p>these significant brownfield sites are highly conducive to sustainable development and delivery of the full range of placemaking principles outlined in Planning Policy Wales. This is referenced within the Housing Trajectory Background Paper, Spatial Options Background Paper, the Minimising the Loss of the Best and Most Versatile (BMV) Agricultural Land Background Paper and the Candidate Site Assessment.</p> <p>The Council has clearly adopted a contrasting approach to extant regeneration allocations and has only proposed two existing large-scale brownfield regeneration sites for re-allocation towards meeting the housing requirement based on robust, site-specific evidence. This approach is in strict accordance with the Development Plans Manual and the Council remains confident that there has been a substantial change in circumstances to demonstrate these two sites can be delivered, which justifies their inclusion in the Replacement LDP.</p>
<p><b>Implications Associated with Size of Housing Allocations and Timing of Delivery</b></p> <p>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).</p> <p>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</p>	<p>Concerns regarding the housing trajectory, and timing and delivery of sites – proposal to amend the housing trajectory</p>	<p>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 can deliver mixed use development at a scale that will enhance communities.</p> <p>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.</p> <p>In terms of the proposal to place a greater reliance on smaller sites, several sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infrastructure problems and it is 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.</p> <p>It is acknowledged that the representor has heavily referenced secondary research and past local delivery rates before concluding "the delivery rates in the LDP are overly ambitious". However, it can equally be argued that the representor's views are overly pessimistic in the context of the site-specific evidence collected and submitted to the Local Planning Authority in respect of each proposed allocation. It is felt that, by placing such significant emphasis on past trends and secondary research, the representor has failed to consider the enhanced site-</p>

not start delivering units later in the plan period and therefore may not deliver their full capacity over the plan period.

The typically lengthy timeframes associated with the delivery of large housing sites is widely recognised and documented. A report undertaken by Chamberlain Walker on behalf of Barratts ('The Roll of Land Pipelines in the Housebuilding Development Process') in 2017 for instance identifies the following:

- The Callcutt Review in 2006 estimated that, across all site sizes, it took on average 4.2 years to navigate the 'raw land' through the four development phases (A+B+C+D). The four development phases are defined as follows: A) pre-planning application; B) planning application to planning permission; C) planning permission to start on site; and D) under construction (build out) to completion. This rose to 5.8 years for sites of 150 homes or more.

- A later Local Government Association (LGA) study estimated that, across all site sizes, it took on average 1.7 years to navigate land through the 'post-planning permission' Phases (C+D). This rose to 3.2 years for sites of 100 homes or more.

- Data for 2017 from Barbour ABI indicates that 'post-planning permission' development timescales (C+D) have increased markedly: on sites of 20 homes or more it now takes at least 4.0 years on average from the grant of detailed planning permission to site completion, compared to the earlier LGA estimates of 1.7 to 3.2 years. This shows that it is taking longer to deliver new housing in the 'post-planning permission' Phases (C+D).

Added to the above is the 'Start to Finish' Second Edition (February 2020) Report prepared by Lichfields which provides evidence in relation to lead-in times and delivery rates across a variety of sites in

deliverability requirements that are both enshrined in national planning policy and have been embedded into the Replacement LDP process from the outset.

There were four stages to assessing Candidate Sites, as detailed within the Candidate Site Assessment Methodology:

- Stage 1: Potential to Support the LDP Strategy
- Stage 2: Detailed Site Assessment – Deliverability, Sustainability and Suitability
- Stage 3: Consultation with Appropriate Specific Consultation Bodies
- Stage 4: Sites for Inclusion in the Deposit LDP

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 deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints and opportunities. In addition, there was an assessment of the policy context, together with the local geographical context, including known infrastructure issues. Site promoters were asked to prepare and submit a significant number of technical supporting studies to demonstrate each site's deliverability, viability, sustainability and suitability. Sites without sufficient supporting evidence, did not progress to Stage 4 of the Candidate Site Assessment (those sites to be included in the Deposit LDP). However, all sites that progressed to Stage 4 were supported by a substantial body of work that demonstrated they were financially viable, capable of providing all necessary supporting infrastructure and deliverable over the plan period. This frontloading of evidence ensured an appropriate range and choice of deliverable sites was proposed for allocation in sustainable locations to ensure delivery of the plan's strategy.

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. In accordance with the Development Plans Manual, the trajectory was based on a cumulative analysis of realistic build rates, the capacity to deliver growth levels, phasing and timing of key sites, infrastructure requirements and delivery and viability work. 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 are considered generic, overly pessimistic and fail to properly consider the site-specific evidence prepared in support of each allocation.

It is notable that the representor states, "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". However, equally, the representor has provided no site-specific evidence to substantiate these comments and justify that these proposed allocations will not be determined as quickly as the LPA considers. This statement fails to recognise the extent of site-specific evidence gathering and frontloading of the planning process and the extensive discussions held with key stakeholders and the housing trajectory group.

Moreover, 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

Wales and England. In total, 97 sites were assessed as part of this study, equivalent to over 195,000 dwellings, providing real world benchmarks.

It is acknowledged that the Calcutt Review, LGA study and Barbour ABI report refer to planning applications in England, and that there are limited examples of Welsh sites in the Lichfields report (although two sites are within Bridgend – Broadlands and Parc Derwen). However, the fact that the reports focus on English examples is considered immaterial in this context, particularly given the lack of Welsh specific evidence. This is because whilst the two planning systems in Wales and England may be diverging more and more, they are not so vastly different that when considering matters such as lead-in times, the evidence gathered in the above reports is not applicable. Indeed, given the Welsh PAC and SAB requirements there are additional processes and technical approvals required in Wales that could further 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 barriers 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 the 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 planning permission”.

The ‘Start to Finish’ Second Edition (February 2020) Report assesses lead-in times from the start of the planning

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.

Since this representation was made, a further Housing Trajectory Stakeholder Group meeting was held in May 2022. The representor was present at that meeting. At the latest Stakeholder Group, no objections were raised regarding the completion figures, anticipated annual delivery rates for sites with planning permission and the anticipated annual delivery rates for the proposed housing allocations. As such, there are no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period, all of which have been approved by the Stakeholder Group.

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 pre-application 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 pre-commencement 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.



<p>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.</p> <p>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 are large sites (arguably all 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.</p> <p>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.</p> <p>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</p>	<p>Concerns regarding the adoption timescales and delays to the Delivery Agreement</p>	<p>The representor's concerns regarding the Delivery Agreement, and the associated potential impacts on the delivery of homes are noted. However, since publication of the Deposit Plan, a Replacement Delivery Agreement has been prepared and approved by Council on 17<sup>th</sup> November 2021 and Welsh Government on 10<sup>th</sup> December 2021. This has prompted re-evaluation of Plan's proposed housing allocations, and their timing and phasing, to enable construction of a revised housing trajectory. The Council has been and continues to remain committed to preparing a robust housing trajectory that demonstrates the timing and phasing of all sites over the plan period is realistic and deliverable. The final selection of proposed sites is detailed within the Candidate Site Assessment and Housing Trajectory Background Paper.</p>
---	--	--

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 adopted LDPs. In 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 dis-application 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 and when they are required. In order for the LDP to be considered sound, there needs to be flexibility in the event that the strategic/large sites do not deliver quickly, nor at the quantum anticipated (potentially through the allocation a number of edge of settlement allocations which are deliverable and viable in the short term to address the shortfall in housing land supply in the early part of the plan period). None of the strategic housing sites or allocations in COM1 are shown as delivering any units until year 6, and it is considered that this represents an unrealistic timeframe (as this would imply units coming forward in 2023/24). Based on the research undertaken in Table 3.1 above, for sites to be delivering completions in 2023/4 then applications would already need to have been submitted and the progress of the whole process (submission, determination, decision, discharge of pre-commencement conditions, site enabling works, completions) would need to be well advanced. The plan overestimates the speed in which development can be brought forward on strategic sites, and the LDP strategy which concentrates on large sites potentially will not allow sites to come forward in a timely manner in response to market demands.

Land at Ty Draw Farm therefore needs to be allocated for residential development to increase the prospect of delivery of homes, including much needed affordable homes, in the immediate term. The delivery of residential development on the site would make a valuable contribution to the windfall figure of 1,060 homes as identified in Table 7 of the Deposit LDP.

Range and Mix of Homes

In addition to units not coming forward within the early part of the plan period, it is also the case that the Deposit LDP as it currently stands does not provide an

Concerns the Deposit LDP does not provide an adequate range of

The representor's statement is noted although is factually inaccurate. The LHMA 2021 drew upon a range of socioeconomic, demographic and property market data to provide detailed insights into the mechanics of the local housing markets in accordance with Welsh Government Guidance. This allowed the type of need in different Housing Market Areas (e.g. tenure mix and house types) to be calculated and extrapolated over the Replacement

	<p>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.</p>	<p>types and sizes of units to meet varied housing needs</p>	<p>LDP period. The LHMA forms a core piece of baseline evidence to influence the scale, type and location of growth within the Replacement LDP. The Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with Planning Policy Wales. COM6 seeks to achieve these principles by enabling mixed, socially inclusive, sustainable communities through a range of house types and sizes to meet the needs of residents at an efficient and appropriate density. Rather than specifying a numeric requirement, COM6 sets the framework to make the most efficient use of land based on site-specific context, thereby ensuring an appropriate balance of uses can be pursued in a manner that maximises the density of developments without compromising the quality of the living conditions provided. Supporting paragraph 5.3.39 also clearly references that, “in order to foster sustainable, mixed and balanced communities, the Council will expect developers to provide an appropriate mix of dwelling sizes and types to meet local housing needs, with reference to the evidence within the latest LHMA. A preponderance of larger dwelling types with four or more bedrooms should be avoided and developments must seek to provide a suitable range of housing types to meet the needs of households in the County Borough. Careful designs and layouts should be utilised to avoid a visual distinction between different types of housing and tenures”.</p> <p>In relation to Porthcawl Waterfront specifically, the masterplan development principles detailed within proposed Policy PLA1 clearly specify the need for an appropriate mix of dwelling sizes and types to meet local housing needs. 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 and this will ensure an appropriate mix of dwelling types, densities and tenures to meet identified housing needs.</p>
<p>219</p>	<p><b>COM3: On-Site Provision of Affordable Housing</b></p> <p>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.</p> <p>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.</p> <p>Paragraph 5.108 of The Development Plans Manual Edition 3 (March 2020) states that:</p> <p>“It may be necessary to have separate targets for key sites if the evidence base suggests this is more appropriate.”</p>	<p>Proposed changes being sort to Policy COM3.</p>	<p>The rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. As outlined within the Development Plans Manual, “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. The two are not contradictory, rather the site specific being a refinement of the high level appraisal” (WG, 2020, para 5.89). Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council’s aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3. The representor’s proposal to set the same target affordable housing requirements for allocated sites as for the Housing Market Area that they sit within is therefore considered unjustified and not supported.</p>

	<p>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.</p> <p>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.</p>		
219	<p><b>COM10: Provision of Outdoor Recreation Facilities</b></p> <p>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.</p> <p>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.</p> <p>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.</p> <p>It is therefore suggested that the policy is amended so that it reads as follows:</p> <p><i>“Provision of a satisfactory standard of outdoor recreation space is required on all</i></p>	<p>Proposed changes being sort to Policy COM10.</p>	<p>All new housing developments will be expected to include an appropriate level of outdoor recreation for public amenity purposes in the interest of Good Design. This is an integral means of delivering several Local Wellbeing Objectives, including to reduce social and economic inequalities and ensure healthy choice in a healthy environment. COM10 is based on Fields in Trust recommended benchmark guidelines and allotment standards endorsed by the National Society of Allotment and Leisure Gardeners. The standards detailed within COM10 are not intended to represent minimum provision on all developments. As stated within COM10 itself, “provision of a satisfactory standard of outdoor recreation space is required on all new housing developments” and “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”. On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG. As such, the proposal to alter COM10 and provide more flexibility to depart from standards recommended by Fields in Trust, is not supported.</p> <p>Policy COM10 is considered appropriate in its current form.</p>



	<p><del>new housing developments. based on following standards:</del></p> <p><del>1) 1.2 hectares per 1,000 population for Playing Pitches;</del>  <del>2) 1.6 hectares per 1,000 population for Other Outdoor Sports (non-pitch);</del>  <del>3) 0.25 hectares per 1,000 population for Equipped/Designated Play Areas;</del>  <del>4) 0.3 hectares per 1,000 population for Other Outdoor Provision;</del>  <del>5) 0.2 hectares per 1,000 population for Allotment provision;</del></p> <p><b>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."</b></p> <p><b>Changes sought: revisions to wording of policy COM 10 as above.</b></p>		
407	N/A	No changes proposed	Comments noted.
391	<p><b>Land at Castle Meadows, Coity, Bridgend - (ref. 323.C1)</b>  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.</p> <p><b>The Preferred Strategy Approach to Housing Delivery</b>  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</p>	Concerns regarding mix of sites, windfall allowance and reliance on strategic sites.	<p>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.</p> <p>Identification of appropriate proposed allocations 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.</p>

<p>a higher than average allowance for windfall sites.</p> <p>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 these 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.</p> <p>Such an approach was generally supported by us at this stage, 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 at this stage was that the Authority's proposal to allocate 'Edge of Settlement' was correct and should form a substantive proportion of the housing allowance.</p> <p><b>Deposit BRLDP Approach to Housing Delivery</b>  <b>Summary of the Approach</b>  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 some medium size sites of 150 or less included. All such sites are identified as delivering units from Year 6 onwards.</p> <p>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</p>		<p>All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs. This process provides a high degree of confidence that the sites included within the Deposit Plan are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. Moreover, 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 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 total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement, taking into account the potential for non-delivery and unforeseen issues in accordance with the Development Plans Manual.</p> <p>The windfall allowance is not considered higher than average. 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 (UCS, 2020) was published alongside the Deposit Plan to provide further analysis of the potential urban capacity of the County Boroughs' settlements for housing to evidence the expected small and windfall site allowance rate. This UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this particular component of housing supply. It therefore demonstrates (in addition to past trends) that the small and windfall site allowance rate utilised in the Replacement LDP is both realistic and deliverable. It also serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP. The representor's concerns are therefore unsubstantiated and not supported. Moreover, the housing trajectory will be reviewed as the plan progresses and as part of the monitoring framework of the Replacement LDP. Refer to the Housing Trajectory Background Paper and UCS.</p>
--	--	--

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 non-strategic 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 by*

<p><i>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.</i></p> <p>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.</p> <p>Cardiff's approach is to reflect the issues 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.</p> <p>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.</p> <p>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.</p> <p>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</p>		
--	--	--

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 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.

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.

**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

	<p>Farm, Coity on behalf of Llanmoor 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.</p> <p>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.</p>		
--	---	--	--

Title: Do you have any comments to make on the employment strategy?			
ID	Comment	Summary of changes being sought/proposed	Council response
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	<p>The Deposit Plan has been underpinned by 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.</p> <p>Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration</p>



			<p>and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p> <p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p> <p>Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward.</p>
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 devices.	Concerns regarding employment	<p>Comments noted. The Deposit Plan has been underpinned by 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.</p> <p>Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p> <p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p> <p>Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward.</p>
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	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p>

	<p>generating developments' already in existence but will not be utilised until BCBC 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 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 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 regard it as an unsuitable location, I believe that employment plans will probably backfire.</p>		<p>The Deposit Plan has been underpinned by 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.</p> <p>Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p> <p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p> <p>Whilst it is beyond the scope of the LDP to guarantee that employers will come to the area, Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward.</p>
779	<p>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.</p>	<p>Porthcawl should be designed to cater for the young professional, as well as providing services for tourist to enjoy</p>	<p>Comments noted. In terms of employment, the imbalance and shortage of employment land in Porthcawl is acknowledged compared with other settlements within the County Borough, although it is likely that the majority of employment in the town will continue to be provided through planned growth in the commercial, leisure and tourism sectors.</p>
847	<p>No</p>	<p>No changes proposed.</p>	<p>Comments noted.</p>
996	<p>Taking already scarce parking will have a negative effect on local businesses in Porthcawl and provide minimal additional employment opportunities.</p>	<p>Concerns regarding parking in Porthcawl</p>	<p>Comments noted. In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. The Council is currently preparing such a strategy. That strategy will be set in the context of Planning Policy Wales, which states that a design-led approach to the provision of car parking should be taken, which ensures an appropriate level of car parking is integrated in a way which does not dominate the development. It will also recognise that there are a limited number of peak days each year when demand is particularly high and that it would be unrealistic to provide for this demand within the core of the development. To do so would sterilise valuable development land to provide parking that might only be needed on approximately 10 days each year. Nevertheless, car parking as part of the plans for the proposed regeneration</p>

			<p>area will continue to be provided at the Hillsboro car park to the west of the regeneration area. Some visitor parking could be introduced as part of the enhancement of the Eastern Promenade.</p> <p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans.</p>
329	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 good for any area	If land is available of which meets planning policy guidance and can be utilised to create new houses, new business opportunities ,employment will be good for any area	<p>Support noted. In terms of employment, Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward.</p> <p>In terms of housing, an Urban Capacity Study (UCS) (See Appendix 39) has been prepared of which provides analysis of the potential urban capacity of the County Borough's settlements for housing to evidence the expected small and windfall site allowance rate. The UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this particular component of the housing supply. It serves as a useful resource to developers who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP.</p>
107 6	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.	<p>The Deposit Plan has been underpinned by 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. Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace-based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p> <p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p>

			<p>Policy ENT1 supports SP11 by allocating new employment land for development that caters for a range of different types of businesses. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward.</p> <p>SP11 facilitates opportunities for economic growth by directing employment-generating development to the most appropriate and sustainable locations, supporting expansion of existing businesses and ensuring strong spatial alignment between housing and employment growth. This holistic employment land strategy will allocate 71.7 hectares of new employment land to be brought forward and accommodate up to 7,500 additional jobs over the Plan period.</p> <p>In terms of Brackla Industrial Estate, 7.7 hectares of vacant available employment land has been carried over from the existing LDP and will continue to be designated for employment purposes within the Replacement LDP as indicated in the Employment Background Paper.'</p>
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.	<p>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.</p> <p>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. 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. 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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>The plan preparation has involved the assessment of 171 sites, the vast majority of which are greenfield. 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p>

			As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including a range of placemaking principles and masterplan development principles (See Deposit Policy PLA3 – Page 71). Green Infrastructure and Outdoor Recreation Facilities will be required to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance. The proposed allocation will also be required to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst 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	Expand the allocation of Brackla Industrial Estate from "blanket B1, B2, B8 uses" to make reference to education and retail uses	Proposal not supported. Brackla Industrial Estate was identified in the Economic Evidence Base Study as a site that would contribute to future employment land supply, hence the site is allocated within ENT1 for new employment land development of B1, B2 and B8 use classes. Whilst the representor's comments are noted, any alternative proposal would need to clearly justify the loss of employment land in accordance with the adopted LDP policy framework.

<p>site's context. A Retail Impact Assessment has been undertaken which concludes that:</p> <ul style="list-style-type: none"><li>- Impacts associated with the proposal in the design years are low and represent no threat to the vitality and viability of the existing centres.</li><li>- 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.</li><li>- 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.</li></ul> <p>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</p>		
--	--	--

	amended to make reference to the current education and discount retail proposals for the site.		
293	<p><u>Land at Ty Draw Farm, North Cornelly, Pyle, Bridgend, CF33 4AL</u></p> <p>South Wales Land Developments Limited (SWLDL) fully support Jehu in their promotion of the site for residential development. National policy (within Planning Policy Wales) is clear in requiring LPAs to consider de-allocation of under-utilised or under-performing sites for more efficient uses. As set out in SWLDL's previous representations to the LDP and within Jehu's representations to the Deposit LDP, it has been demonstrated that the site is suitable for residential development, in lieu of the site's proposed allocation for employment uses. This is particularly the case given the site's prevailing context. The Welsh Government's Development Plans Manual (DPM) places an increased emphasis on deliverability and the Council (and Inspector examining the Plan) will need to have a high degree of confidence that each allocated site has a realistic prospect of being delivered in line with the housing trajectory set out within the RLDP. Whilst 'deliverability' was referenced four times in the second edition of the DPM, the latest (Edition 3) DPM includes the reference to 'deliverability' 20 times. The latest edition (Edition 3) of the Development Plans Manual states: "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?'... For the purposes of this Manual ensuring sites in plans are deliverable means both in terms of deliverability and financial viability." For the reasons set out within the Sutton Consulting Employment Land Review (July 2021 – appended to Jehu's Deposit LDP representations), the land is undeliverable as an employment allocation despite extensive marketing over a prolonged period and despite being positively</p>	<p>De-allocate Ty Draw Farm, North Cornelly ENT1(11) as an employment site and either re-allocate as a residential site or 'white land' within the settlement boundary</p>	<p>The representor's objection to Ty Draw Farm being retained as an employment allocation is noted, although is not supported by the Replacement LDP's evidence base.</p> <p>The Economic Evidence Base Study (EEBS, 2019) examined the required scale and distribution of employment need over the Replacement LDP Period and identified the land best suited to meet the need. In doing so, the Study makes policy and site-based recommendations to inform emerging policies and site allocations, including recommendations regarding to Ty Draw Farm specifically.</p> <p>Planning consent was granted in 2014 for a mixed-use development with 2.23 ha of new employment land at Ty Draw Farm. The balance of the site was released for housing with the intention that this would enable the delivery of the remaining employment land. The EEBS determined 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 that "it is reasonable to give the site more time to come forward before concluding that it should be released". However, the EEBS recommended against limiting the scope of the site to 'high value' uses and instead concluded that the location of the site makes it more attractive for more 'normal demand', including local offices and some lighter industrial uses within the B1 use class. Hence, the site was considered to have a realistic prospect of contributing to future employment land supply.</p> <p>An Economic Evidence Base Update (2021) was subsequently conducted following publication of the WG 2018-based household and population projections and consideration of alternative trend and housing-led alternatives (refer to the Demographics Update Addendum (2020)). This refreshed analysis considered the workforce, jobs and economy implications of the new suite of projections along with any impact on the amount of land the emerging Plan needs to allocate for employment uses. The 2021 Update concluded that "the economic impacts of the increase in working age population identified in the new Welsh Government demographic data (the 2018-based PG-short term migration scenario) can be satisfactorily accommodated in the short term by the flexibility and margin built into the EEBS. But this requires retention of all of the proposed allocated land, and in the mid to longer term enabling the Ford Works site to be available for future employment uses to the 1,700 jobs are at 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.</p> <p>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".</p> <p>This evidence supports allocation of Ty Draw Farm as an employment site within ENT1(11) and therefore, the representor's proposal is not supported. Refer also to the Employment Background Paper.</p>

	<p>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.</p>		
399	<p>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.</p> <p>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'.</p> <p><u>Employment Land Considerations</u></p> <p>BCBC Economic Evidence Base Update (2021)</p>	<p>De-allocate Ty Draw Farm, North Cornelly as an employment site and re-allocate as a residential site</p>	<p>While the representor has cited extensive marketing of the remaining 2.23ha site, the Council's view is that the site has yet to be marketed to its full potential as more modest, yet accessible, serviced employment opportunity. The site materially changed when the residential development was completed by the end of 2016/17. 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, 2019) and Update (2021) are still entirely relevant, and it is reasonable to give the site more time to come forward before concluding that it should be released as an employment allocation. The employment site has not yet been readied for the market and the owner has not yet fulfilled the original commitment to undertake the enabling works as required by the Section 106 Agreement. As such, this proposal is not supported. A full rebuttal is provided below. Refer also to the Employment Background Paper.</p> <p><u>Site Background and Existing Local Development Plan History</u></p> <p>The representor has made numerous statements that the site has been allocated for employment use 'for a period of over 40 years'. However, the Council considers the remaining part of the site (proposed for re-allocation) to now be a materially different prospect to the broader site referred to by the representor. The actual history and current status of the site is summarised below for ease of reference.</p> <p>Ty Draw Farm, North Cornelly is a site adjacent to the M4, and was allocated by the previous adopted Bridgend Unitary Development Plan (UDP) as a Special Employment Site under Policy E6(5). The purpose of this policy was to protect and distinguish the site from other employment sites based on its physical and locational characteristics, particularly its peripheral yet prominent location adjacent to the countryside, and its proximity to the strategic road network. Previous UDP Policy E6(5) allocated the whole greenfield site for this purpose, which extended to 6.1ha in total.</p> <p>During the <u>existing</u> adopted LDP (2006-2021) examination, the Inspector concluded that the submitted evidence supported a modest increase in the number of dwellings identified in the plan. The <u>existing</u> LDP Inspector</p>



<p>The Authority's 'Economic Evidence Base Study' (2019) was updated by the 'Economic Evidence Base Update' (2021), as required to reflect the 2018-based household and population projections published in August 2020 (replacing the previous 2014 based household projections).</p>	<p>believed such new provision could be made without departing from the Plan's strategy, pointing to the fact that the amount of employment land in the submitted Plan exceeded that which is likely to be developed within the Plan period. The Inspector considered that such over-provision of employment land against short- and medium-term needs provided an opportunity for some employment land allocations to be diverted to meet the additional housing need.</p>
<p>Before the 2021 Update is analysed it must first be pointed out that neither the 2019 or 2021 Economic Evidence Base Studies properly assess the fact that the site has been allocated for employment for well over 40 years, apart from one passing reference to it being a 'long-standing' allocation. The report is a theoretical exercise and doesn't take into consideration what has actually happened (or not!) on the site, and any party who looked at the history of the site could not reasonably conclude that it has a good prospect of employment use considering it has been allocated since at least the 1970s. The history of the site was raised in representations at previous stages and is referenced again below</p>	<p>On the 29<sup>th</sup> January 2013, a report was presented to Council proposing that a number of sites, including Ty Draw Farm, North Cornelly, could accommodate additional residential development to meet the identified shortfall. The change to Ty Draw Farm was justified on the basis that the site was formerly in public ownership (Welsh Government) but is now privately owned. In this regard, and at that time, there was no prospect of any public regeneration funding to facilitate the delivery of the site solely for employment purposes in the foreseeable future. It was acknowledged that development of the site would require considerable investment, notably provision of an appropriate access due to the difficult geology and topography of the northern part of the site. On this basis, it was considered unlikely that the site would come forward in the short to medium term for <u>employment only</u> purposes. Council therefore approved the proposed changes to the <u>existing</u> LDP and Ty Draw Farm, North Cornelly was allocated as a Regeneration and Mixed-Use Development Scheme under Policy PLA3, incorporating Strategic Employment development facilitated by the release of approximately 94 dwellings.</p>
<p>New demographic scenarios have identified higher growth in the 20-44 years age bands in 2018/2019. It is understood that to identify the economic consequences of the new population projections, Experian were commissioned by Stantec to rerun their economic forecasting model rebased to the Edge 2018-based PG-short term migration scenario. Based upon the updated economic forecasting, the 2021 Economic Evidence Base Update Report concludes that the uplift in population requires 2.8 ha employment land per annum – the implications of which are summarised:</p>	<p><u>Hybrid Residential/Employment Planning Application</u></p>
<ul style="list-style-type: none"> <li>• <i>“This balances with the available land (2 ha plus the 0.8 ha buffer), meaning in absolute terms there is no shortfall in provision. However, this position would mean no flexibility in the balance between demand and supply, and absolutely no</i></li> </ul>	<p>The site was also the subject of a mixed-use planning application at the time (application P/12/796/FUL refers). This application proposed the facilitation of part of the site for employment purposes enabled by 94 residential units. The Local Planning Authority acknowledged the lack of readily available employment land in the west of the County Borough, although considered that this could be remedied by the release of this site in the (now adopted and existing) LDP as a proposed mixed-use development. This would provide 94 additional dwelling units within the short term, whilst enabling the remaining part of the site for employment purposes.</p>
	<p>However, in agreeing the acceptability of this application, it was considered important to ensure the consent was conditioned or appropriately tied to a legal agreement to ensure that the employment elements of the scheme were implemented and not left vacant after construction of the residential development. This was to secure the provision of serviced employment land ready for construction, ensure appropriate highway access was provided and to ensure that the developer carried out any profiling or levelling of the employment land as deemed necessary.</p>
	<p>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). Condition 23 of the Decision Notice also stated, “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 three years beginning with the date of this permission” (i.e. by 22<sup>nd</sup> January 2017). 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.</p>
	<p>Later planning consents increased the number of residential units on the site to 106 dwellings (applications P/15/135/FUL and P/16/271/FUL refer). Persimmon Homes, who partnered with the site owner, South Wales Land Developments, to deliver the residential housing, confirmed that the first dwelling on the site was occupied on 30<sup>th</sup> June 2014. Therefore, in order to comply with the original Section 106 agreement, the employment land</p>

<p><i>scope, certainly in the short term, for any losses in the existing stock or in the supply”.</i></p> <ul style="list-style-type: none"> <li>• <i>“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”.</i></li> </ul> <p>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:</p> <ul style="list-style-type: none"> <li>• <i>“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”.</i></li> <li>• <i>“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”.</i></li> </ul>		<p>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.</p> <p>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 9<sup>th</sup> June 2016 it was completed on 5<sup>th</sup> 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.</p> <p>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 10<sup>th</sup> 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).</p> <p>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”.</p> <p>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 10<sup>th</sup> July 2020 to vary Condition 1 of a planning permission P/16/994/RLX. The replacement condition imposed was “application for</p>
--	--	---

<p>The reliance upon one methodology brings into question the robustness of the economic evidence update.</p>	<p>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).</p>	<p>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).</p>
<p><u>Employment Review Report Sutton Consulting (July 2021)</u></p>	<p>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:</p>	<p>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.</p>
		<p><u>Current Development Opportunity</u></p>
		<p>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.</p>
		<p>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.</p>
		<p>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).</p>
		<p>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.</p>
		<p>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).</p>

<ul style="list-style-type: none"> <li>• 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.</li> <li>• 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.</li> <li>• 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.</li> </ul> <p><u>Deliverability of Ty Draw Farm Site for Employment</u></p> <p>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.</p> <p>The undeliverable nature of the employment land at Ty Draw Farm is evidenced by historic development plan</p>		<p>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.</p> <p>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 and 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.</p> <p>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).</p> <p><u>EEBS 2019 and EEBS Update, 2021</u></p> <p>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.</p> <p>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.</p> <p>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.</p>
--	--	---

<p>allocations. The site has been allocated within the Development Plan 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). In summary the site has formed an employment allocation in the following plans:</p> <ul style="list-style-type: none"> <li>• Ogwr Borough Council Kenfig-Pyle Local Plan (which received a Certificate of Conformity in May 1985, stating that it conformed with the adopted County Structure Plan at that time);</li> <li>• Ogwr Borough Local Plan (adopted April 1995);</li> <li>• Bridgend County Borough Council Unitary Development Plan 1996-2016; (UDP) (adopted May 2005) – ‘Special Employment Site’;</li> <li>• Bridgend LDP (adopted 2013) – ‘Strategic Employment Site’.</li> <li>• Bridgend Deposit Replacement LDP (July 2021) – ‘Employment Site’</li> </ul> <p>In addition, a Section 78 appeal at the site in 2005 (APP/F6915/A/05/1175163) attached at Appendix B also referred to the planning history, stating in paragraph 12 that “Prior to the acquisition of the site by the Land Authority for Wales (LAW) in 1978, a letter was received from the Borough Planning Officer (Appendix 10 Document 12) indicating on an informal basis that there was no objection in principle to residential development of the site”. Paragraph 27 goes on to state that “...the site has been allocated and positively and actively marketed for employment development for over 25 years but has not been taken up. A sale board has been maintained on or adjacent to the site since 1979.” This confirmed that the site has been allocated for employment use further back than 1985 (to at least the 1970s), that it was marketed between 1979 and 2005 (and has been since), and that the principle of residential development was accepted in 1978, 43 years ago.</p>		<p>As such, while the representor has cited extensive marketing of the remaining 2.23ha at Ty Draw Farm, North Cornelly, it is considered the site has never been marketed to its full potential, with completed levelling works to provide a development plateau. It is acknowledged that the impacts of the Covid-19 pandemic have undoubtedly delayed progress in this respect. However, in absence of this work being undertaken in the first instance and prior to marketing, the Council’s view is that the site has yet to be marketed to its full potential as more modest, yet accessible, serviced employment opportunity.</p> <p>A supplementary update to the EEBS was also undertaken in 2021 to consider the workforce, jobs and economy implications arising from the refreshed 2018-based projections together with impacts of the Ford Manufacturing Plant closure in September 2020. In the context of the updated demographics, the EEBS Update (2021) recommended continued retention of the site as an employment allocation for a number of reasons. These included: an aligned growth strategy (homes and jobs), no scope to deallocate sites that are suitable and available for employment use, a zero-vacancy rate in Pyle in 2019, a new access road (Cilgant Y Lein) now providing easy access to the A48/M4, and the potential allocation of a mixed-use strategic site immediately to the east (Land East of Pyle). If allocated, this latter site will generate need for a smaller site like Ty Draw Farm to cater for the smaller scale local servicing needs. Equally, if Land East of Pyle doesn’t come forward then Ty Draw Farm would represent the only form of new employment supply in the locality. In either case, the site would remain an important opportunity to meet the needs of and help to diversify the economy of the western part of the Bridgend County Borough.</p> <p>The EEBS Update (2021) also raised two other important points, which are re-emphasised here in response to the representor’s submission. Firstly, it is notable that the representor has highlighted the potential “conflict with the critical mass of residential property in the area”. This point is not accepted by the Council as 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 only modest requirements for large vehicles and the volumes will be comparatively low, and access in and out of the site can be separated” (para. 6.3).</p> <p>Secondly, the representor also comments that the site lacks prominence due to a dense woodland buffer on the boundary with the A4229 that links to the A48. In response, and as stated within the EEBS Update (2021), “while this may have been a factor when the site was a lot larger and capable of accommodating bigger corporate entities, the site is now of modest scale (2.23 ha), which means that the type of office/light industrial activity that may come forward are more likely to service the local community, in respect of which the type of prominence required is different. The new access road links the site to the new residential area to the south, and the rising ground and more modest landscape buffer on the western flank means the site actually has reasonable prominence from School Terrace that links to the wider community of North Cornelly beyond. We are aware of many local light industrial sites that have far less prominence than this site will offer” (para.6.3).</p> <p><u>Revised Projections and Forecast</u></p> <p>It is noted that the representor has cited issues with the “use of one model/methodology” in terms of calculating employment land requirements, whilst referencing the Development Plans Manual’s recommendations to develop multiple scenarios reflecting different approaches to growth. However, and contrary to the representor’s deductions, a detailed body of evidence has been considered and evaluated before formulating the Replacement LDP’s growth strategy and employment land requirements. This is clearly explained in the Strategic Growth</p>
---	--	---

<p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <li>• “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).</li> <li>• “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).</li> <li>• “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).</li> <li>• “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</li> </ul>		<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p><u>Employment Site Search</u></p>
--	--	--

<p>beyond proximity to a motorway junction, and this leads me to the view that access to J37 alone is insufficient reason to persist with the Ty Draw allocation” (6.32.7).</p> <ul style="list-style-type: none"> <li>• “I conclude that it is timely to review the future of this site and that it is eminently suitable for housing” (6.32.11).</li> <li>• “I recommend that the site at Ty Draw Farm be allocated for housing” (6.32.12).</li> </ul> <p>To confirm, the site has been allocated for employment use within at least 4 concurrent Development Plans for a period spanning back to at least the 1970s. If the site is again reallocated for employment use within the replacement LDP (up to 2033), the land will have been subject to an employment allocation for nearly 60 years.</p> <p>The site was owned by the Welsh Government (and former Welsh Development Agency) from 1978, until it was disposed of by the Welsh Government 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:</p> <ul style="list-style-type: none"> <li>• The site has been marketed consistently since December 2013</li> <li>• Marketing has occurred via a variety of means, including: <ul style="list-style-type: none"> <li>o A professionally designed A4 marketing brochure which were distributed to approx. 30 local and national commercial agents</li> </ul> </li> </ul>		<p>The representor has stated that “the Authority essentially needs to look at the identification of suitable, viable and deliverable employment sites afresh, and not to simply rollover previous allocations”. However, as clearly documented within the EEBS (2019), a detailed review was undertaken into the property market for employment space in Bridgend County Borough, covering office and general industrial/strategic distribution space. This review provided a more qualitative overview, complementing and testing the quantitative need assessment. As stated in the EEBS itself, “the main purpose of the analysis is to identify where there is potential demand for new floorspace, and hence a need for development land to be identified in the emerging plan. In relation to demand, we identify the types of business that are taking space in the borough or may consider doing so, and what property they are looking for in terms of size and quality. In relation to supply and market balance, we analyse the stock which is currently available, recently developed and in the pipeline, and the rental values that properties in the area are achieving” (EEBS, 2019, paras 5.2-5.3). This detailed qualitative evidence assessed the potential demand for new employment floorspace, and the quantity and qualitative mix of development sites that the Replacement LDP should identify for employment uses. As detailed within the Employment Background Paper, and at Preferred Strategy Stage, the EEBS (2019) recommended identifying a minimum of 60ha of land to meet future employment needs, and, in terms of supply, the Study identified 18 sites, which totalled to 71.7ha, to meet this need. The allocation of marginally more land than the assessment of need suggests (a positive margin of 11.7 ha or 0.8 ha pa) was considered pragmatic to allow for flexibility and contingency in terms of delivery, should the mix of potential jobs differ or land not come forward as expected. The Preferred Strategy adopted these recommendations to ensure plentiful employment land to meet the needs and requirements of a range of future potential employment scenarios. This aimed to help minimise the need for out-commuting and promote more self-contained, interconnected communities in accordance with the LDP Vision.</p> <p>Since publication of the Preferred Strategy, two fundamental changes occurred, which warranted re-evaluation of the evidence base. Firstly, Welsh Government published new sub-national household and population projections in August 2020. The potential workforce, jobs and economy implications of the new projections needed to be assessed to gauge the impact on the amount of land the emerging Plan needs to allocate for employment uses. Secondly, the Ford Bridgend Manufacturing Plant closed in September 2020, with the loss of 1,700 jobs. The EEBS Update (2021) identified the economic consequences of this projected boost to the labour force and assessed whether the need assessment and land supply identified in the EEBS (2019) remained sufficient for the Replacement LDP. The 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 identified at Preferred Strategy stage. It was concluded that, planning on this basis will ensure the local economy is not constrained from responding positively to the younger (working age) population profile instigated through the Mid-Growth Option. However, this required retention of all of the proposed allocated employment sites (totalling 71.7ha in total, comprising almost all undeveloped parcels within existing estates), which means demand and supply are in balance, yet with no flexibility.</p> <p>Therefore, in the mid to longer term, enabling re-development of the former Ford Manufacturing Plant (45ha) will provide additional flexibility. This will simultaneously provide a means to replace the 1,700 jobs that have been lost and maximise a key economic opportunity located on one of the County Borough’s premier industrial estates. A unique approach is required in this respect and it will be necessary to enable a flexible mix of economic uses, not necessarily akin to the type and density of uses previously accommodated on the site. This will also provide a greater degree of flexibility and choice to the employment land supply.</p> <p>Therefore, by implying the Council has simply ‘rolled over’ existing employment sites without due consideration, it is felt that the representor has overlooked this detailed evidence base. In addition, by stating “no new sites are considered”, it is equally felt that the representor has overlooked the flexibility within the employment land supply, as identified at Preferred Strategy Stage, and the evident capacity to accommodate the projected boost to the labour force.</p>
--	--	---

<ul style="list-style-type: none"><li>o Erection of a 16ft x 8ft marketing board at the site entrance</li><li>o Listing on LSH and EG Propertylink websites</li><li>o Press advertising in the Western Mail</li></ul> <ul style="list-style-type: none"><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> <p>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:</p> <ul style="list-style-type: none"><li>• Development of the site by owner occupiers for B1 Employment use was not viable.</li></ul> <p>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.</p> <ul style="list-style-type: none"><li>• Speculative development of the site was not viable.</li></ul> <p>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.</p> <ul style="list-style-type: none"><li>• The site was not deemed prominent enough. Occupiers demanded a greater roadside presence or preferred to occupy</li></ul>		
---	--	--



<p>mixed use developments at locations such as Bocam Park at Junction 35 of the M4 and Magden Park in Llantrisant.</p> <ul style="list-style-type: none"><li>• Alternative sites are available.</li></ul> <p>Alternative sites that are easier to develop and had fewer physical constraints were available in alternative locations in the borough.</p> <p>The 2021 Stantec Update Report states that the new access road and access points provide easy access to the a48/M4, but the UDP Inspector concluded in paragraph 6.37.2 that “access to J37 alone is insufficient reason to persist with the Ty Draw allocation”. The 2021 Stantec Update Report 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. Secondly, 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.</p> <p>Planning Policy Wales 11 (February 2021) highlights 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.” Given that this site has been allocated for employment use four times, over a period of over 40 years, it is considered that it is clearly “no longer needed for office, industrial or retail purposes”, that it is “underperforming” and that its “deallocation” through the development plan process (i.e. the current</p>		
--	--	--

<p>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.</p> <p>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.</p> <p>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</p>		
---	--	--

<p>no intention that it would be delivered so quickly (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).</p> <p>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 de-allocated. 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</p>		
--	--	--

	<p>can be delivered, and in accordance with the Development Plans Manual the site should therefore be de-allocated for employment use.</p> <p>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:</p> <ul style="list-style-type: none"> <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> </ul> <p>Based on the above, it is considered that the Ty Draw Farm allocation does not have a clear and adequate supporting rationale and has not been accompanied by evidence to demonstrate that it is deliverable.</p>		
399	<p><b>Suitability of Land at Ty Draw Farm for Housing</b></p> <p>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</p> <ul style="list-style-type: none"> <li>• The site is in a sustainable location and can be freed from all constraints;</li> <li>• The site is capable of being delivered and developed through the plan period; and</li> <li>• The development of the site is financially viable.</li> </ul> <p>In summary, very recently constructed residential development lies to the south and more established residential development to the west of the site, and</p>	<p>Re-allocate Ty Draw Farm as a residential allocation or de-allocate it as an employment site and alter the status to 'white land' within the settlement boundary.</p>	<p>The representor's objection to Ty Draw Farm being retained as an employment allocation is noted, although is not supported by the Replacement LDP's evidence base.</p> <p>The Economic Evidence Base Study (EEBS, 2019) examined the required scale and distribution of employment need over the Replacement LDP Period and identified the land best suited to meet the need. In doing so, the Study makes policy and site-based recommendations to inform emerging policies and site allocations, including recommendations regarding to Ty Draw Farm specifically.</p> <p>Planning consent was granted in 2014 for a mixed-use development with 2.23 ha of new employment land at Ty Draw Farm. The balance of the site was released for housing with the intention that this would enable the delivery of the remaining employment land. The EEBS determined 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 that "it is reasonable to give the site more time to come forward before concluding that it should be released". However, the EEBS recommended against limiting the scope of the site to 'high value' uses and instead concluded that the location of the site makes it more attractive for more 'normal demand', including local offices and some lighter industrial uses within the B1 use class. Hence, the site was considered to have a realistic prospect of contributing to future employment land supply.</p> <p>An Economic Evidence Base Update (2021) was subsequently conducted following publication of the WG 2018-based household and population projections and consideration of alternative trend and housing-led alternatives (refer to the Demographics Update Addendum (2020)). This refreshed analysis considered the workforce, jobs and economy implications of the new suite of projections along with any impact on the amount of land the emerging Plan needs to allocate for employment uses. The 2021 Update concluded that "the economic impacts of the increase in working age population identified in the new Welsh Government demographic data (the 2018-based PG-short term migration scenario) can be satisfactorily accommodated in the short term by the flexibility and margin built into the EEBS. But this requires retention of all of the proposed allocated land, and in the mid to longer term enabling the Ford Works site to be available for future employment uses to the 1,700 jobs are at</p>

<p>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 <i>“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.”</i> 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.</p> <p>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:</p> <p><u>LDP Candidate Site Drawing Booklet – Hammond Architectural</u></p> <p>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</p>		<p>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.</p> <p>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”.</p> <p>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 <b>the basic principle of residential development on this site is acceptable</b>” (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.</p> <p>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</p>
--	--	--

<p>Plan; Concept Masterplan; and Key Parameter Plans (comprising Design Principles; Land Use; Access &amp; 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.</p> <p><u>Transport</u></p> <p>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.</p> <p>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.</p> <p><u>Noise</u></p> <p>Hunter Acoustics, who were the acoustic consultants for the 2012 planning application, have provided an updated noise map. They conclude that road noise</p>		<p>only modest requirements for large vehicles and the volumes will be comparatively low, and access in and out of the site can be separated” (para. 6.3).</p> <p>The representor’s proposals to a) re-allocate the site for residential development, or b) de-allocate the site as an employment site and alter the status to ‘white land’ within the settlement boundary are both not supported. The aforementioned evidence base supports allocation of Ty Draw Farm as an employment site within ENT1(11). Refer also to the Employment Background Paper. The final selection of proposed sites for housing are documented within the Candidate Site Assessment and all of these sites are supported by a detailed body of evidence to demonstrate their deliverability.</p>
---	--	--

levels at ground and first floor facades are indicated to be  $\leq 60\text{dB LAeq,16hr}$ . 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  $55\text{dB LAeq,16hr}$  with standard 1.8m high close-board fences included, except for the northern plots where garden levels of  $56\text{dB LAeq,16hr}$  are predicted. This excess is very marginal and should not be considered a significant constraint to development.

Ecology

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 organic-rich 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

<p>the County Borough, in more commercially attractive areas.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p><u>Conclusion</u></p> <p>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.</p> <p>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</p>		
--	--	--

<p>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.”</p> <p>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).</p> <p>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.</p> <p>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</p>		
---	--	--

	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	<p><u>Overall Strategy</u> 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.</p> <p>The overall employment land strategy 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.</p> <p><u>Draft Polices ENT2 and ENT3</u> 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:</p> <p><i>“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”</i></p> <p>Waterton Industrial Estate is identified as an employment site within the Bridgend Sustainable Growth Area.</p>	<p>Support the overall employment strategy.</p> <p>Amend the wording of ENT2 and ENT3 to enable a greater flexibility between uses</p>	<p>Comments noted. The employment strategy is considered flexible enough to recognise the changing demands of the market.</p> <p>No action considered necessary - ENT2 protects sites for employment purposes to maintain a sustainable level of employment land. Refer to the Economic Evidence Base Study and Employment Background Paper. Without careful management, fragmentation and pressure for alternative uses could result in a cumulative loss of employment land and premises to the detriment of the local and regional economies. Nevertheless, as detailed within the supporting text, ENT2 already allows for the development of ancillary services or facilities that support the primary employment uses of sites. Such uses must be secondary in nature to the main employment use. They could include, for example, a small shop or trade counter selling produce from the unit, or services such as snack bars, cafés, childcare facilities, gyms or training centres, which provide a service to the local employees or users of the existing employment site. Therefore, the policy wording of ENT2 is considered appropriate in its current form.</p> <p>ENT3 outlines criteria to determine applications for non-B uses on such sites. The Council is aware that there significant pressure for certain uses of this nature on employment sites, notably those falling within Class D2, such as cinemas, children’s soft play centres, indoor/outdoor activity centres and fitness/sports centres, which by their very nature, require a large space, often with significant headroom. However, in order to deliver the ‘Town Centre First’ approach outlined within PPW and Future Wales, the Replacement LDP prioritises town centres as multi-functional focal points for communities. The Plan seeks to direct facilities and services to town centres in the first instance, to capitalise on their health and vibrancy, whilst ensuring intended users can easily walk, cycle and/or use public transport to access them. Therefore, before any non-B uses are permitted on allocated employment sites, applicants must demonstrate that other sites within town centres, and the sequential hierarchy detailed in SP12, have been investigated and found to be unsuitable. Proposals for non-B uses will also need to demonstrate that either the existing use is inappropriate or that the land or premises is surplus to</p>

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, post-

the 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*

*promotes use of Active Travel opportunities.”*

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 and mixed uses including residential, however 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 absorbed into the policy wording. We suggest it is reworded as follows to provide sufficient flexibility (strikethrough is

Amend the wording of ENT5 as it is considered inflexible, yet also vague and should be more specific.

No action considered necessary –the policy wording of ENT5 is considered flexible enough in its current form. The supporting text clarifies ‘ENT5 recognises that a unique approach is required in this respect and it will be necessary to enable a flexible mix of economic uses, not necessarily akin to the type and density of uses previously accommodated on the site’.

The representor has simultaneously requested more specific policy wording ‘to identify the appropriate uses on the site to not constrain the sites potential’. However, and contrary to the representor’s statement, progression of an SPG is considered the optimal means of providing more specific planning guidance on the exact nature, type and mix of uses. The Council remains committed to prioritising the re-development 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.

In terms of the site’s proximity to a Site of Importance for Nature Conservation (SINC), the Replacement LDP’s policies are cross-cutting in their nature and should be read as a whole. In order for a holistic approach to be taken towards nature conservation and/or areas of scientific interest in the County Borough, DNP5 builds on SP17 and provides a second tier of protection above that afforded by national policy. This is necessary to protect those sites defined in the LDP as being of regional or local importance. The regionally and locally important sites identified in DNP5 (which include all designated Local Nature Reserves, SINCs, and identified Regionally Important Geodiversity Sites) are important to biodiversity and the conservation of scientific interest in the County Borough. Development within or adjacent to a SINC must be compatible with the nature conservation or scientific interest of the area in accordance with DNP5. As such, no further amendments to ENT5 are considered necessary in this respect.



suggested deletion, underline is suggested addition):

*“The Council will prioritise the re-development 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 residential development. 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

<p>requirement is removed in the supporting text to Draft Policy ENT5.</p> <p>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.</p> <p>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.</p> <p>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.</p>	
---	--

Title: Do you have any comments to make on retail centres and development policies?			
ID	Comment	Summary of changes being sought/proposed	Council response
82	No comment	No changes proposed.	Comments noted.
488	Only if jobs are made available in Bridgend	Only if jobs are made available in Bridgend	Comments noted. A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.

			<p>Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to come forward</p> <p>In terms of retail, Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve.</p> <p>As part of the technical supporting evidence base the Council have prepared a Retail Study (See Appendix 16) of which sets out evidence-based recommendations on retail need, the distribution of need and the definition of primary shopping areas to inform policies and site allocations. Additionally, the Council have also undertaken a sense check of the evidence base in light of the pandemic (See Appendix 51 – Background Paper 11: Covid-19 Policy Review). The 2019 Retail Study already identified a shift in commuter spending habits and online shopping, which the pandemic has accelerated. The LDP recognises that high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.</p> <p>The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.</p>
516	<p>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.</p>	<p>Concerns regarding retail centres</p>	<p>Comments noted. Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve.</p> <p>As part of the technical supporting evidence base the Council have prepared a Retail Study (See Appendix 16) of which sets out evidence-based recommendations on retail need, the distribution of need and the definition of primary shopping areas to inform policies and site allocations. Additionally, the Council have also undertaken a sense check of the evidence base in light of the pandemic (See Appendix 51 – Background Paper 11: Covid-19 Policy Review). The 2019 Retail Study already identified a shift in commuter spending habits and online shopping, which the pandemic has accelerated. The LDP recognises that high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.</p> <p>The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have been reviewed against the existing distribution of uses and likely future requirements. In Bridgend and Maesteg, the Primary Shopping Areas have been condensed to create a consolidated retail core. Additional Secondary Shopping Areas have been identified on the proposals map for Bridgend, Maesteg and Porthcawl to create greater flexibility and promote the potential for a wider range of uses.</p> <p>The demand/supply for larger convenience retailing is likely to be less sensitive to the impacts of the pandemic. However, use of sequential tests alongside careful management of out-of-centre locations will remain key to avoid promotion of unsustainable travel patterns.</p>

			<p>The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.</p>
707	<p>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 the confines of the very tight parking.</p>	<p>Concerns regarding Porthcawl town centre</p>	<p>Comments noted. Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve.</p> <p>As part of the technical supporting evidence base the Council have prepared a Retail Study (See Appendix 16) of which sets out evidence-based recommendations on retail need, the distribution of need and the definition of primary shopping areas to inform policies and site allocations. Additionally, the Council have also undertaken a sense check of the evidence base in light of the pandemic (See Appendix 51 – Background Paper 11: Covid-19 Policy Review). The 2019 Retail Study already identified a shift in commuter spending habits and online shopping, which the pandemic has accelerated. The LDP recognises that high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.</p> <p>The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have been reviewed against the existing distribution of uses and likely future requirements. In Bridgend and Maesteg, the Primary Shopping Areas have been condensed to create a consolidated retail core. Additional Secondary Shopping Areas have been identified on the proposals map for Bridgend, Maesteg and Porthcawl to create greater flexibility and promote the potential for a wider range of uses.</p> <p>The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.</p>
779	<p>Agreed and for Porthcawl I would ensure 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.</p>	<p>Ensure some retail facilities are available to people in the Sandy Bay/Salt Lake area, whilst providing access to retail in the town centre itself</p>	<p>Comments noted. A food store is proposed for Salt Lake. Marketing for a new foodstore was carried out in autumn 2020 whereby numerous bids (five in total) were received and appraised. A robust selection process in which each bid was carefully assessed against a planning development brief resulted in Aldi Stores Ltd being identified as the preferred bidder. Subject to a planning application, the foodstore will be constructed alongside all-new residential, leisure, retail development at Salt Lake as well as new areas of green open space, bus terminus, active travel facilities and more.</p> <p>Furthermore, commercial units will be considered on the ground floor of residential development fronting the Eastern Promenade, if there is market demand for such uses. Ancillary commercial units will also be considered along the potential Recreational Route along Sandy Bay. In these locations retail uses, restaurants and cafes will be particularly encouraged.</p> <p>The active travel requirements within the regeneration area are expected to facilitate the use of sustainable modes of transport across the site, both in an east to west and north to south axis. In addition to facilitating the</p>

			use of sustainable modes of transport within the site, any forthcoming proposal will be expected to improve active connectivity to the existing Town Centre and the wider settlement of Porthcawl.
847	No	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	<p>Comments noted. In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car par enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p> <p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans.</p>
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	<p>Comments noted. The Strategy recognises the need to deliver wider regenerative benefits to Valleys communities at a scale which acknowledges their infrastructure capacity, topography and geographical constraints. Therefore, Maesteg and the Llynfi Valley is allocated as a Regeneration Growth Area, reflecting the fact that it demonstrates the largest capacity to accommodate regeneration-led growth within the Valleys communities. There are individual sites within this area that already have the benefit of planning permission or are the subject of development briefs or master planning exercises to facilitate their delivery and regeneration. A substantial number of these sites are also brownfield or are under-utilised, whilst also being aligned to transport hubs, thereby demonstrating high credentials in terms of sustainable development and placemaking. However, it is acknowledged that some will require longer lead-in times, preparatory remediation-based enabling works and more detailed strategies to facilitate delivery.</p> <p>The Ogmore and Garw Valleys are not identified as areas that will accommodate significant growth in recognition of their topographical and viability based constraints. However, these areas would benefit from community based regeneration and are therefore designated as Regeneration Areas in recognition of the fact that a range of approaches are required to incite community investment opportunities.</p>
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 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.	Concerns relating over-development and retail.	<p>In terms of retail provision, Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve.</p> <p>As part of the technical supporting evidence base the Council have prepared a Retail Study (See Appendix 16) of which sets out evidence-based recommendations on retail need, the distribution of need and the definition of primary shopping areas to inform policies and site allocations. Additionally, the Council have also undertaken a sense check of the evidence base in light of the pandemic (See Appendix 51 – Background Paper 11: Covid-19 Policy Review). The 2019 Retail Study already identified a shift in commuter spending habits and online shopping, which the pandemic has accelerated. The LDP recognises that high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.</p>

			<p>The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have been reviewed against the existing distribution of uses and likely future requirements. In Bridgend and Maesteg, the Primary Shopping Areas have been condensed to create a consolidated retail core. Additional Secondary Shopping Areas have been identified on the proposals map for Bridgend, Maesteg and Porthcawl to create greater flexibility and promote the potential for a wider range of uses.</p> <p>The demand/supply for larger convenience retailing is likely to be less sensitive to the impacts of the pandemic. However, use of sequential tests alongside careful management of out-of-centre locations will remain key to avoid promotion of unsustainable travel patterns.</p> <p>The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.</p>
1085	<p>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 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.</p>	<p>Concerns relating over-development and retail.</p>	<p>In terms of retail provision, Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve.</p> <p>As part of the technical supporting evidence base the Council have prepared a Retail Study (See Appendix 16) of which sets out evidence-based recommendations on retail need, the distribution of need and the definition of primary shopping areas to inform policies and site allocations. Additionally, the Council have also undertaken a sense check of the evidence base in light of the pandemic (See Appendix 51 – Background Paper 11: Covid-19 Policy Review). The 2019 Retail Study already identified a shift in commuter spending habits and online shopping, which the pandemic has accelerated. The LDP recognises that high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.</p> <p>The Primary Shopping Area boundaries for Bridgend, Maesteg and Porthcawl have been reviewed against the existing distribution of uses and likely future requirements. In Bridgend and Maesteg, the Primary Shopping Areas have been condensed to create a consolidated retail core. Additional Secondary Shopping Areas have been identified on the proposals map for Bridgend, Maesteg and Porthcawl to create greater flexibility and promote the potential for a wider range of uses.</p> <p>The demand/supply for larger convenience retailing is likely to be less sensitive to the impacts of the pandemic. However, use of sequential tests alongside careful management of out-of-centre locations will remain key to avoid promotion of unsustainable travel patterns.</p> <p>The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.</p>
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted

254	Policy SP12		Comments noted
	<p>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.</p> <p>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.</p> <p>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 floorspace considered appropriate at groundfloor – to retail, community or commercial (although it</p>	<p>Policy SP12 wording should support residential development within retailing and commercial centres</p>	<p>Policy SP12 identifies the Retail and Commercial Hierarchy which, in compliance with the Town Centre First policy of PPW, promotes Town, District and Local Centres as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve. SP12 and its supporting policies acknowledge that these centres are moving away from their traditional retail roles and seek to encourage a wider variety of services and facilities given their sustainable locations.</p> <p>As the representor has recognised, the supporting text to SP12 acknowledges the role mixed use development can play in increasing the vitality and viability of these centres. In appropriate circumstances, this can include elements of residential development. The supporting policies to SP12 provide further guidance as to when this may be considered acceptable. In the absence of any suggestion of alternative policy wording, it is therefore not felt necessary to repeat the wording of the supporting text or that of Policy ENT7 or ENT8 in Policy SP12.</p>

<p>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.</p> <p>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.</p> <p>Policy ENT6</p> <p>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.</p> <p>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</p>	<p>Policy ENT6(1) should be extended to include land to the east</p> <p>Policy ENT6 should refer to other acceptable uses – including residential</p> <p>The policy and supporting text should be amended to:</p> <ul style="list-style-type: none"> <li>• Extend the boundary of the Southside key site to include additional land to the east (at</li> </ul>	<p>Policy ENT6 supports 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. The Replacement LDP also acknowledges and supports the projects and measures identified in the emerging Bridgend Town Centre Masterplan to improve the quality of the town centre environment and promote more flexibility by increasing the range of community, leisure, and social facilities on offer. The wider ‘Southside’ site is one such project identified within the Masterplan and is incorporated within the boundary of the Retail and Commercial Centre.</p> <p>The key sites identified in Policy ENT6 are rollover sites from the existing LDP and provide a quantum of potential retail floor space that goes above and beyond providing for the quantitative need identified in the Retail Study. As such, it is not felt that additional sites need to be specifically identified or allocated given the supportive policy framework is in place to enable the regeneration of previously developed and brownfield sites in retail and commercial centres. Additionally, no such sites were promoted through the Candidate Site Assessment.</p> <p>Policy ENT6 recognises that existing town and district centres represent the most sustainable locations for new retail proposals. The Retail Study has calculated comparison and convenience retail needs based on the constant market shares approach, which assumes that existing shopping patterns will remain stable over the LDP period (2018 – 2033). The Study identifies limited quantitative needs across the County Borough and qualitative retail needs in Bridgend (to improve comparison fashion, leisure and the general shopping environment) and Porthcawl (to improve main food shopping offer). This reflects market trends which are likely to influence demand for new retail and commercial leisure floorspace across the LDP period. These trends are likely to have become more pronounced as a result of the Coronavirus pandemic, when all but non-essential retail closed and online shopping becoming the norm. In terms of location, as existing town centres, Bridgend</p>
--	--	---



<p>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.</p> <p>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’.</p> <p>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 uses would also be appropriate as part of the regeneration proposals (including leisure, community, education and residential).</p> <p>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</p>	<p>Brackla Street/Cheapside)</p> <ul style="list-style-type: none"> <li>• Not be overly prescriptive regarding the amount and nature of floorspace to be brought forward.</li> <li>• Be sufficiently flexible to allow a wide range of uses – including retail, commercial, leisure, education, community and residential.</li> </ul>	<p>and Porthcawl represent the most sustainable locations for new retail development from both an environmental and social perspective. The Deposit LDP will seek to encourage retail proposals to sites in town centres that are well served by existing public transport networks meaning they are best placed to serve residents (including those without access to a car). This strategy has clear social and environmental benefits in terms of reducing car dependency and making use of existing infrastructure. PPW acknowledges town centres as the best location for retail and leisure uses. In terms of form and scale, the Retail Study confirms that the regeneration site designations in Bridgend provide sufficient capacity to meet long-term comparison needs. The Study also confirms that long-term convenience needs could be delivered early in the plan period to provide a new main food shopping facility in Porthcawl to meet evidenced qualitative needs.</p> <p>The Policy ENT6 allocations are not intended to be restrictive, just to demonstrate that capacity exists within existing centres to meet the identified need. This will help prevent inappropriate development elsewhere, assisting rather than hindering regeneration efforts.</p>
--	---	--

<p>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.</p> <p>In summary, our client welcomes the inclusion of the Bridgend Shopping Centre within the wider Southside regeneration site.</p> <p>However, the policy and supporting text should be amended to:</p> <ul style="list-style-type: none"> <li>• Extend the boundary of the Southside key site to include additional land to the east (at Brackla Street/Cheapside).</li> <li>• Not be overly prescriptive regarding the amount and nature of floorspace to be brought forward.</li> <li>• Be sufficiently flexible to allow a wide range of uses – including retail, commercial, leisure, education, community and residential.</li> </ul> <p>Policy ENT7</p> <p>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.</p> <p>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.</p>	<p>We recommend that Criterion (1) and (2) are deleted from Policy ENT7</p>	<p>The criteria contained within Policy ENT7 are not considered to be overly restrictive. They are intended to provide an element of control and a degree of subjectivity when assessing future development proposals.</p> <p>Policy ENT7 is considered to provide sufficient flexibility for a range of proposals to come forward. The criteria have been devised to enable such proposals to be assessed on a case-by-case basis, as the representor has suggested. By doing so, rather than having a negative impact on town centres, the Policy will have the opposite effect by ensuring that proposals are of sufficient quality to help increase and promote the attractiveness and vitality of town centres. This is something that the representor has alluded to in their representation.</p>
--	---	---

<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>		
--	--	--

	<p>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.</p> <p>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.</p> <p>Please note - comments re: Policy ENT7/ENT8 are made at the end of this form due to space limitations</p>		
554	<p>Welcome more retail as Maesteg is becoming a ghost town</p>	<p>No changes proposed – more retail needed in Maesteg</p>	<p>Strategic Policy SP12 of the Replacement Plan will promote Town, District and Local Centres throughout the County Borough as hubs of socio-economic activity and the focal points for a diverse range of services which support the needs of the communities they serve.</p> <p>As part of the technical supporting evidence base the Council have prepared a Retail Study (See Appendix 16) of which sets out evidence-based recommendations on retail need, the distribution of need and the definition of primary shopping areas to inform policies and site allocations. The Study identified a shift in commuter spending habits and online shopping, which the pandemic has accelerated. The LDP recognises that high streets will continue to change especially in the short-term, hence it contains more flexible planning policies and retail boundaries within town centres, recognising their changing roles and functions. It will be increasingly important for them to accommodate a wider array of uses than just retail, including community, health, leisure, residential and flexible co-working spaces alongside areas of open space.</p> <p>The Primary Shopping Area boundary for Maesteg has been reviewed against the existing distribution of uses and likely future requirements. As such, the Primary Shopping Area has been condensed to create a consolidated retail core. An additional Secondary Shopping Area has been identified to create greater flexibility and promote the potential for a wider range of uses.</p> <p>The Replacement LDP ultimately seeks to allow the traditional role and function of established retail centres to evolve and adapt appropriately. The hierarchy will be used positively to ensure Town, District and Local Centres</p>

			continue to be the principal locations for new retail, office, leisure and community facilities. This will both capitalise on and enhance the vitality and viability of centres, whilst generating increased social and economic activity.
287	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.
1390	<p>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:</p> <ul style="list-style-type: none"> <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> </ul> <p>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.</p> <p>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.</p> <p>Amendments to the policy are considered necessary to include 'large-scale residential or mixed-use allocations' to ensure that appropriate retail, leisure and appropriate complementary commercial elements are</p>	<p>Establish retail 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</p>	<p>Policy ENT6 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 developments, 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. Masterplan Development Principles are outlined for the Strategic Sites in Policies PLA1-5. The policy framework is therefore considered appropriate in its current form.</p> <p>The (2019) Retail Study has calculated comparison and convenience retail needs based on the constant market shares approach, which assumes that existing shopping patterns will remain stable over the LDP period (2018 – 2033). The Study identifies limited quantitative needs across the County Borough and qualitative retail needs in Bridgend (to improve comparison fashion, leisure and the general shopping environment) and Porthcawl (to improve main food shopping offer). This reflects market trends which are likely to influence demand for new retail and commercial leisure floorspace across the LDP period.</p> <p>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.</p> <p>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.</p> <p>This will be complemented by policies in the Deposit LDP which clearly highlight the circumstances where new retail developments outside the centres in the hierarchy will be acceptable. i.e. where they can demonstrate they will complement existing facilities and can be accessed by sustainable forms of transport.</p>

<p>provided in all sites where there is substantial housing growth.</p> <p><u>Justification</u>  In support of the proposed retail floorspace, the Parc Afon Ewenni Retail Report is submitted and confirms the following:</p> <ul style="list-style-type: none"> <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.</li> <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>		<p>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. The proposal to set additional retail thresholds within ENT 6 is therefore not supported.</p> <p>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. Therefore, the representor’s proposal is not supported and would be of detriment to the Town Centre First principle enshrined in national policy and promoted by the Replacement LDP Strategy.</p>
--	--	--

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:

*“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:*

- 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)*
- 2) *Porthcawl Waterfront Regeneration Area, Porthcawl – 2,500m<sup>2</sup>*

*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. 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". (our underlining)

In line with the Placemaking objectives to PPW 11, the proposals would provide high-quality 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 fine-grained 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

<p>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.</p> <ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li><li>• 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.</li></ul>		
--	--	--

219	<b>ENT6: Retail and Commercial Development</b>  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 renewable energy, mineral 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.  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 ENT10.  Proposal to set a higher threshold within ENT11.	The Council has an aspiration for all new homes to be net zero carbon in the first instance. The Bridgend Local Area Energy Strategy and Renewable Energy Assessment identifies those areas considered to be suitable for development for district heat, hybrid and electric-heating solutions in combination with different levels of targeted fabric retrofit. Policy ENT10 outlines a sequential approach that requires new major development to demonstrate sustainable heating and cooling systems have been selected in the first instance, where technically feasible and financially viable.  The requirement for new major development to be accompanied by an Energy Masterplan follows the advice contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, "In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission". The proposal to increase the threshold beyond 10 units is therefore not justified and not supported.  ENT11 continues the Council's current approach to seeking more energy efficient and lower carbon housing, and development that is environmentally sustainable in a wider sense in order to achieve the Vision and Objectives for the County Borough and national policy objectives. ENT11 seeks to ensure that the design and standard of any new development is optimised to achieve energy efficiency and zero carbon emissions. Development proposals must demonstrate that sustainable design standards are integral to the proposal through construction and operation, ensuring that they are considered at the beginning of the design process. The requirement for new major development to be accompanied by an Energy Masterplan follows the advice

			contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, “In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission”. The proposal to increase the threshold beyond 10 units is therefore not justified and not supported. Further guidance on implementing the principles and requirements set out in ENT11 will be provided within a future Sustainable Construction and Design SPG.
448	More people means more cars. These people in affordable housing cannot afford electric Tesla cars but will bring old diesel vehicles into Bridgend	Concerns regarding increase of motor vehicles as a result of proposed developments	<p>Comments noted. Whilst it is beyond the scope of the LDP to control the ownership of private cars, Strategic Policy 5: Sustainable Transport and Accessibility will ensure that development must be located and designed in a way that minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, education, local services and community facilities. Development will be required to deliver, or contribute towards the provision of, active travel scheme, public transport measures, road infrastructure, and other transport measures, in accordance with the Bridgend Local Transport Plan and the Bridgend Integrated Network Plan (See Appendix 29).</p> <p>Strategic site allocations identified by policies PLA1-PLA5 detail the site-specific requirements including masterplan development principles and development requirements. Such requirements include pursuing 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.</p>
516	Zero carbon is zero life. It is a destructive and immeasurably stupid goal. Any strategy based on the idea that reducing carbon is a worthy goal is flawed at its core. This strategy needs to be based on science, not ideology.	Concerns regarding zero carbon aims	<p>Under the Environment (Wales) Act (2016), Wales is required to reduce net greenhouse gas emissions by at least 80% by 2050, with interim targets and carbon budgets established to ensure this target is met. Welsh Government have also introduced targets specifically related to local energy generation and ownership, to be achieved by 2030.</p> <p>A Renewable Energy Assessment (REA) (See Appendix 17) identifies the contribution that the County Borough is potentially able to make towards meeting the national renewable energy targets through various forms of technology (See Table 20, page 160). The REA has been informed by The Welsh Government’s Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners, September 2015.</p> <p>The Assessment estimates the current and future energy demands of the County Borough, along with the progress in meeting these demands from local low carbon energy generation assets. Against this backdrop, land within the County Borough boundary has been subject to a resource assessment to identify the potential for renewable and low carbon energy project deployment from a resource perspective.</p> <p>Strategic Policy 13 (and supporting development management policies) will assist the County Borough transition to a low carbon, decentralised energy system that works for its individuals, communities and businesses by encouraging renewable and low and zero carbon energy projects.</p>
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 proposed	Comments noted.
996	No	No changes proposed.	Comments noted.
329	yes good idea and the way forward but has has to contribute to with in the area in which its happened like wind farms etc ,and	Renewable energy needs to be affordable	Support noted. Affordability of renewable energy serving households is a non-material 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	<p>The Council recognises the significant role of renewable energy has to play. The Council has undertaken a Renewable Energy Assessment (See Appendix 17). The Assessment estimates the current and future energy demands of the County Borough, along with the progress in meeting these demands from local low carbon energy generation assets. Against this backdrop, land within the County Borough boundary has been subject to a resource assessment to identify the potential for renewable and low carbon energy project deployment from a resource perspective. A number of technologies have been considered, including, wind energy, ground mounted solar pv, biomass energy, energy from waste, hydropower energy and building integrated solar pv.</p> <p>The Council has set ambitious renewable energy deployment targets to maximise the use of local resources available within the County Borough. In order to reduce future energy demand, strict policies have been introduced that seek to maximise the energy efficiency of new development, integrate energy generation into wider development proposals, and ensure that low carbon heating systems are installed.</p>
287	No		Comments noted
253	<p>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.</p> <p>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.</p>	<p>Proposal to set a higher threshold within ENT10.</p> <p>Proposal to set a higher threshold within ENT11.</p>	<p>No action is considered necessary. The Council has an aspiration for all new homes to be net zero carbon in the first instance. The Bridgend Local Area Energy Strategy and Renewable Energy Assessment identifies those areas considered to be suitable for development for district heat, hybrid and electric-heating solutions in combination with different levels of targeted fabric retrofit. Policy ENT10 outlines a sequential approach that requires new major development to demonstrate sustainable heating and cooling systems have been selected in the first instance, where technically feasible and financially viable.</p> <p>The requirement for new major development to be accompanied by an Energy Masterplan follows the advice contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, "In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission". The proposal to increase the threshold beyond 10 units is therefore not justified and not supported. As also confirmed by Welsh Government, Energy Masterplans for major developments and exploring heat networks directly align with Policy 16 (Future Wales).</p> <p>No action is considered necessary. ENT11 continues the Council's current approach to seeking more energy efficient and lower carbon housing, and development that is environmentally sustainable in a wider sense in order to achieve the Vision and Objectives for the County Borough and national policy objectives. ENT11 seeks to ensure that the design and standard of any new development is optimised to achieve energy efficiency and zero carbon emissions. Development proposals must demonstrate that sustainable design standards are integral to the proposal through construction and operation, ensuring that they are considered at the beginning of the design process. The requirement for new major development to be accompanied by an Energy Masterplan follows the advice contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, "In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report.</p>

			<p>This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission". The proposal to increase the threshold beyond 10 units is therefore not justified and not supported. As also confirmed by Welsh Government, Energy Masterplans for major developments and exploring heat networks directly align with Policy 16 (Future Wales). Further guidance on implementing the principles and requirements set out in ENT11 will be provided within a future Sustainable Construction and Design SPG.</p>
170	<p>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.</p>	<p>Proposal to set a higher threshold within ENT10 and ENT11.</p>	<p>No action is considered necessary. The Council has an aspiration for all new homes to be net zero carbon in the first instance. The Bridgend Local Area Energy Strategy and Renewable Energy Assessment identifies those areas considered to be suitable for development for district heat, hybrid and electric-heating solutions in combination with different levels of targeted fabric retrofit. Policy ENT10 outlines a sequential approach that requires new major development to demonstrate sustainable heating and cooling systems have been selected in the first instance, where technically feasible and financially viable.</p> <p>ENT11 continues the Council's current approach to seeking more energy efficient and lower carbon housing, and development that is environmentally sustainable in a wider sense in order to achieve the Vision and Objectives for the County Borough and national policy objectives. ENT11 seeks to ensure that the design and standard of any new development is optimised to achieve energy efficiency and zero carbon emissions. Development proposals must demonstrate that sustainable design standards are integral to the proposal through construction and operation, ensuring that they are considered at the beginning of the design process.</p> <p>The requirement for new major development to be accompanied by an Energy Masterplan follows the advice contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, "In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission". As also confirmed by Welsh Government, Energy Masterplans for major developments and exploring heat networks directly align with Policy 16 (Future Wales). The proposal to increase the threshold beyond 10 units is therefore not justified and not supported. Further guidance on implementing the principles and requirements set out in ENT11 will be provided within a future Sustainable Construction and Design SPG.</p>
221	<p><u>Policy ENT10 (Low Carbon Heating Technologies for New Development)</u></p> <p>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 or 10,000 sqm or more commercial floorspace. As such, the current policy approach set out in the Deposit Plan is</p>	<p>Proposal to set a higher threshold within ENT10</p>	<p>No action is considered necessary. The Council has an aspiration for all new homes to be net zero carbon in the first instance. The Bridgend Local Area Energy Strategy and Renewable Energy Assessment identifies those areas considered to be suitable for development for district heat, hybrid and electric-heating solutions in combination with different levels of targeted fabric retrofit. Policy ENT10 outlines a sequential approach that requires new major development to demonstrate sustainable heating and cooling systems have been selected in the first instance, where technically feasible and financially viable.</p> <p>The requirement for new major development to be accompanied by an Energy Masterplan follows the advice contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, "In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission". As also confirmed by Welsh</p>

	<p>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...”</p> <p><u>Policy ENT11 (Energy Efficiency Provision within the Design of Buildings)</u></p> <p>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...”</p>	<p>Proposal to set a higher threshold within ENT11</p>	<p>Government, Energy Masterplans for major developments and exploring heat networks directly align with Policy 16 (Future Wales). The proposal to increase the threshold beyond 10 units is therefore not justified and not supported.</p> <p>Future Wales does indeed state “Large scale mixed-use development should, where feasible, have a heat network with a renewable / low carbon or waste heat energy source. Planning applications for such development should prepare an Energy Masterplan to establish whether a heat network is the most effective energy supply option and, for feasible projects, a plan for its implementation.” However, Future Wales also states, “there is also potential for heat networks below this threshold and developers and planning authorities should explore these opportunities wherever possible. The design of new development should maximise the opportunities to accommodate a heat network. Particular consideration should be given to the form, density, mix of uses and phasing of development” (p. 93). Overall, Future Wales’ spatial strategy places a strong emphasis on the need to make the best use of our resources. Therefore, the Council does not agree with the representor’s statement that “the current policy approach set out in the Deposit Plan is therefore clearly not in general conformance with the National Plan”.</p> <p>No action is considered necessary. ENT11 continues the Council's current approach to seeking more energy efficient and lower carbon housing, and development that is environmentally sustainable in a wider sense in order to achieve the Vision and Objectives for the County Borough and national policy objectives. ENT11 seeks to ensure that the design and standard of any new development is optimised to achieve energy efficiency and zero carbon emissions. Development proposals must demonstrate that sustainable design standards are integral to the proposal through construction and operation, ensuring that they are considered at the beginning of the design process. The requirement for new major development to be accompanied by an Energy Masterplan follows the advice contained within paragraph 5.8.4 of Planning Policy Wales (Edition 11), which states, “In order to further promote energy efficiency and energy conservation, planning authorities should consider including development plan policies requiring applications for major development to be accompanied by an Energy Report. This independent report should include recommendations to the developer relating to energy efficiency and appropriate renewable energy technologies that could be incorporated into the development. A response to that report from the developer should also accompany the application. If planning authorities feel that insufficient consideration has been given to energy issues in project design, they may refuse planning permission”. As also confirmed by Welsh Government, Energy Masterplans for major developments and exploring heat networks directly align with Policy 16 (Future Wales). The proposal to increase the threshold beyond 10 units is therefore not justified and not supported. Further guidance on implementing the principles and requirements set out in ENT11 will be provided within a future Sustainable Construction and Design SPG.</p>
219	<p><u>SP4: Mitigating the Impact of Climate Change</u></p> <p>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</p>	<p>SP4: proposed change to policy wording: 2<sup>nd</sup> and 4<sup>th</sup> criterion.</p>	<p>In response to the representor’s proposed changes to Policy SP4, it is considered unnecessary to strike out the word ‘zero’ under criteria 2 and 4. While the Council has an aspiration for all new homes to be net zero carbon in the first instance, Policy SP4 does acknowledge that this may not be achieved on all future development hence the use of the word ‘low’ to ensure flexibility. In addition, Policy ENT10 outlines a sequential approach for low carbon heating technologies in new development. Therefore, Policy SP4 is considered appropriate in the current form.</p> <p>In addition, the Planning Inspectorate has advised that ‘must’ is appropriate terminology for Strategic and Development Management Policies. Therefore, the proposed changes to SP4 are unsubstantiated and not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p>

<p>construction techniques that mitigate the impact of climate change.</p> <p>It is therefore suggested that this policy reads:</p> <p>“All development proposals <del>must</del> <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:</p> <ol style="list-style-type: none"><li>1) Having a location and layout which reflects sustainable transport and access principles, thereby reducing the overall need to travel (active travel);</li><li>2) Having low <del>low</del> carbon energy requirements by reducing energy demand, and promoting energy efficiency;</li><li>3) Utilising low carbon, local materials and supplies (adopting circular economy principles);</li><li>4) Encouraging the development of renewable and low <del>low</del> carbon energy generation;</li><li>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;</li><li>6) Using resources more efficiently, including averting waste generated from demolition and minimising waste water use and pollution;</li><li>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.</li></ol> <p>All applications for development proposals must clearly demonstrate how they</p>		
--	--	--



	<p>contribute to climate change mitigation and adaption.”</p> <p>Changes sought: amend policy wording of SP4 as above.</p>		
407	<p><b>SP4: Mitigating the Impact of Climate Change</b></p> <p>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 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</p>	<p>SP4: proposed change to policy wording: 2<sup>nd</sup> and 4<sup>th</sup> criterion.</p>	<p>In response to the representor’s proposed changes to Policy SP4, it is considered unnecessary to strike out the word ‘zero’ under criteria 2 and 4. While the Council has an aspiration for all new homes to be net zero carbon in the first instance, Policy SP4 does acknowledge that this may not be achieved on all future development hence the use of the word ‘low’ to ensure flexibility. In addition, Policy ENT10 outlines a sequential approach for low carbon heating technologies in new development. Therefore, Policy SP4 is considered appropriate in the current form.</p>

	<p>sustainable urban drainage systems where relevant. All applications for development proposals must clearly demonstrate how they contribute to climate change mitigation and adaptation.” Changes sought: amend policy wording of SP4 as above.</p> <p>It is therefore suggested that this policy reads: “All development proposals <del>must</del> 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 adaptation.”</p>		
104 9	<p>Renewable Energy Systems Ltd (RES) is 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</p>		

<p>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.</p> <p>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.</p> <p>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 Future Wales: The National Plan 2014 Pre-</p>	<p>Concern raised over the Renewable Energy Assessment (REA).</p> <p>Objection: reference should be made to Future Wales Pre-assessed Areas (PAA) under National /Regional issue NR5.</p> <p>Objection: reference should be made to Future</p>	<p>PPW places a requirement on planning authorities to develop an evidence base to inform the development of renewable energy and low carbon energy policies. The Welsh Government’s Practice Guidance: Planning for Renewable and Low Carbon Energy – A Toolkit for Planners, September 2015, “the Toolkit” (Welsh Government, 2015) is identified within PPW as it provides a methodology for developing an evidence base to inform spatially based renewable energy policies for inclusion within Local Development Plans (LDP).</p> <p>The Council recognises that it has a significant role to play. Previous work that the Council and the Energy Systems Catapult (ESC) undertook forms an integral part of the evidence base, along with the Renewable Energy Assessment. This Assessment has been informed and guided by the Toolkit, although the methods have been updated to account for the local and temporal context of the Bridgend Local Development Plan 2018-2033, where appropriate. The Assessment estimates the current and future energy demands of the County Borough, along with the progress in meeting these demands from local low carbon energy generation assets. Against this backdrop, land within the County Borough boundary has been subject to a resource assessment to identify the potential for renewable and low carbon energy project deployment from a resource perspective. The following technologies have been considered: • Wind energy; • Ground mounted solar PV; • Biomass energy; • Energy from waste; • Hydropower energy; and • Buildings integrated solar PV. 5.4.80 Previous work was undertaken with the Council under the Smart Systems and Heat programme (ETI, 2018b, ESC, 2018b) relating to the potential for low carbon heating within the County Borough. This was drawn on to inform the low carbon heating potential and opportunities. The potential resource available has been compared with projected future energy demands and it is considered unlikely that all of Bridgend County Borough’s future energy needs will be able to be generated from renewable and low carbon sources within the County Borough. This is due to the impracticalities of deploying the level of ground mounted solar PV potential identified within the Assessment. Therefore additional energy generated in other parts of the country and offshore will also be relied upon. The Renewable Energy Assessment was prepared by the Carbon Trust to underpin the Replacement Local Development Plan and has been signed off by Welsh Government and is considered a ‘sound’ platform on which to base its renewable energy policies.</p> <p>NR5 – references Future Wales / National Development Framework. Therefore, NR5 is considered appropriate in the current form.</p> <p>Agreed LS3 should reference Future Wales / National Development Framework.</p>
---	--	--

<p>Assessed Areas (PAAs) were devised bringing development much closer to them. Already by this point in 2.6.5 there is reference a couple of pages earlier identifying Future Wales as a key driver of 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.</p> <p>Policy SP3 on page 60 identifies the need to respond to the climate emergency by maximising opportunities for renewable and low carbon energy generation, which sits rather uncomfortably with the REA and its reduction in the potential for wind in the unrealistic hope that the loss of potential wind energy can be made up by more reliance on solar.</p> <p>In the section on renewable energy from page 155, it can be seen that the Council has followed the REA view that it was unlikely that the Council could reach its target of meeting all its energy demands from renewable and low carbon sources due to the impracticalities of deploying solar panels in large enough numbers – and hence it would have to rely on electricity generated in other parts of the country and offshore to meet the shortfall. This is in 5.4.80 but in 5.4.81 they go on to say that “with this in mind” they have set ambitious renewable energy development targets to maximise local resources. That is a non-sequitur from the previous paragraph and</p>	<p>Wales and Pre-Assessed Areas (PAA) under Environmental issue LS3 –.</p> <p>Objection to para’s 5.4.80 but in 5.4.81. Reference should be made to Planning Policy Wales that 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</p>	<p>The proposed change is rejected as the Bridgend RLDP does not seek to make any amendments to the PAAs in Future Wales / National Development Framework. The RLDP will identify the PAAs.</p>
---	--	---

<p>just does not sit comfortably with the preceding paragraph and indeed the details of the REA. If you have identified a large 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.</p> <p>RES now turns to SP13 which is the renewable and low carbon energy policy. Here the key tests are what proposal this policy is aimed at. The REA took the view 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</p>	<p>LDP Proposals Map.</p> <p>Objection to Policy SP13: proposed change to criteria b).</p>	<p>Appropriate amendments will be made to SP13.</p>
---	--	---

<p>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.</p> <p>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 scheme inside a PAA.</p> <p>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</p>	<p>Objection: SP13 conflicts with Future Wales / National Development Framework.</p>	<p>For the avoidance of doubt, Para 5.4.85 has been amended to clarify that only proposals outside of the PAAs will be required to undertake a landscape and Visual Impact Assessment. Para 5.4.85 now reads ‘<i>SP13 (and supporting development management policies) will assist the County Borough transition to a low carbon, decentralised energy system that works for its individuals, communities and businesses by encouraging renewable and low and zero carbon energy projects. SP13 outlines the criteria against which proposals up to Local Authority-wide scale will be assessed. Only proposals (outside the PAAs) which are likely to have a significant impact on the landscape and/or visual amenity will be required to undertake a Landscape and Visual Impact Assessment and other relevant technical assessments to identify likely significant effects and demonstrate that adequate mitigation has been incorporated into the development</i>’.</p>
---	--	--

<p>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 Ogmere Wind Farm DNS was allowed on appeal in Neath Port Talbot in a landscape character type effectively identical to the LCA6 in which Upper Ogmere sits.</p> <p>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.</p> <p>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</p>		
--	--	--

<p>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.</p> <p>It is far from clear in the DD how the Council thinks that PAA developments will contribute towards its own County target. Realistically, if the Y Bryn project between 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 lower figure of a final target including the</p>	<p>Objection: table 10 is unclear in relation to its proposed targets.</p>	<p>The REA has been carried out in accordance with the REA toolkit – no change is considered necessary.</p>
--	--	---



<p>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.</p> <p>SP17 refers to denying consent where development will have an adverse impact on the character of the landscape, and 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.</p>	<p>Objection: SP17</p>	<p>All policies are inter-related in their nature and need to be read in conjunction with one another in order to gain an understanding of the overall policy direction of the Replacement LDP, therefore, the proposed change is considered unnecessary.</p>
---	------------------------	---

Title: Do you have any comments to make on the natural and built environment 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 biodiversity 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, protected, enhanced and managed through a green infrastructure network. DNP8 clearly states that all major developments will be required to submit a Green Infrastructure Assessment. Major developments are developments of 10 residential units or more. Such schemes will need to be designed to take into account the existing green infrastructure assets to ensure no fragmentation or loss of connectivity whilst maximising ecosystem resilience and ecosystem services. As such, the proposal to apply these requirements to sites of a larger threshold is not supported. Further guidance on Green Infrastructure as part of development will be prepared as Supplementary Planning Guidance in support of the sustainable placemaking and the creation of high quality and biodiverse living environments.
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	<p>Comments noted. In terms of Strategic Development Sites, Policies PLA1-PLA5 detail the site specific requirements including masterplan development principles and development requirements. Such requirements will ensure that sites retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland), and SINC's. Additionally, green infrastructure and outdoor recreation facilities will be required to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p> <p>Furthermore, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. The IDP sets out the requirements of open space and green infrastructure.</p>
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 Resources Wales. The Strategy acknowledges that the County Borough has a rich and varied biodiversity with a broad range of species, habitats and unique, rich landscapes. Policies within the Deposit Plan have been refreshed and updated from the existing LDP and will continue to protect the county borough's environment in line with national planning policy and the Environment Act 2016. These policies cover development in the countryside, special landscape areas, local / regional nature conservation sites, trees, hedgerows and development, green infrastructure, nature conservation 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	<p>Comments noted. In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car par enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p> <p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl</p>

	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 with Cardiff Capital Region 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	<p>Comments noted. The Deposit Plan has been underpinned by 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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>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</p>

			<p>deliverability, sustainability and suitability. Proceeding this detailed assessment, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>In terms of allocated Strategic Development Sites, Policies PLA1-PLA5 detail the site specific requirements including masterplan development principles and development requirements. Such requirements will ensure that sites retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland), and SINCs. Additionally, green infrastructure and outdoor recreation facilities will be required to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p>
329	<p>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</p>	<p>Ensure development compliments surrounding areas</p>	<p>Comments noted. The distribution of growth is 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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>Furthermore, the Council has reviewed all settlement boundaries within the County Borough to determine if they are still appropriate in light of the Replacement LDP Strategy and / or would constitute appropriate amendments to existing boundaries. This review (See Appendix 38) has informed settlement boundaries within the Deposit Replacement LDP. Development that is proposed to take place outside of the settlement boundaries and into the ‘countryside’ would be assessed under Policy DNP1: Development in the Countryside (alongside other relevant policies within the Deposit Plan, depending on the nature of the proposal). Policy DNP1 will ensure that the integrity of the countryside is conserved and enhanced. There is a presumption against development in the countryside and only in exceptional circumstances will development be acceptable.</p> <p>In terms of design, all development will be required to contribute to creating high quality, attractive, sustainable places that support active and healthy lives and enhance the community in which they are located, whilst having full regard to the natural, historic and built environment as set out by Strategic Policy 3: Good Design and Sustainable Place Making. Sustainable Placemaking is fundamental to the successful delivery of the Replacement LDP. Development will be required to be appropriate to its local context in terms of size, scale, height, massing, elevational treatment, materials and detailing, layout, form, mix and density.</p> <p>Additionally, Policies PLA1-PLA5 detail the site-specific requirements for the mixed-use Strategic Development Sites in Regeneration Growth Areas and Sustainable Growth Areas, all of which seek to contribute and address the identified key issues and drivers identified through the Replacement LDP preparation process. A key requirement of all sites will be to provide an appropriate density, with a mix of higher densities at key points in the layout and lower densities on the rural/sensitive edges.</p>

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.	<p>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.</p> <p>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. 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. 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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>The plan preparation has involved the assessment of 171 sites, the vast majority of which are greenfield. 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including a range of placemaking principles and masterplan development principles (See Deposit Policy PLA3 – Page 71). Green Infrastructure and Outdoor Recreation Facilities will be required to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance. The proposed allocation will also be required to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.</p>
874	Proposed Policy DNP6 relates to Biodiversity, Ecological Networks, Habitats and Species. The policy wording itself states that “ <i>All development proposals must contribute to biodiversity net gain and</i>	Change wording of Policy DNP6 to...	The supporting text to Policy DNP6 promotes a range of opportunities identified within the BCBC Local Biodiversity Action Plan (see Appendix 33) that development proposals must seek to implement to achieve biodiversity net gain or ecological enhancement. The measures identified in the bullet points are not in priority order or ranked as to their importance. The proposed change to the policy wording would extract one of the measures and elevate it to be included in the policy itself. This would give the impression of being more important

	<p><i>improved ecosystem resilience, as demonstrated through planning application submissions.</i></p> <p>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.</p> <p>We believe that the policy should reflect the supporting text in promoting recreation linkages and promoting active travel. We therefore suggest that the policy reads:</p> <p><i>“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”</i></p>	<p><i>“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”</i></p>	<p>than the other measures listed. Similarly, to include all measures in the policy wording would make the policy too unwieldy.</p> <p>For this reason, the proposed change is not considered necessary.</p>
720	Agree	Support	Comments noted
722	Agree	Support	Comments noted
254	<p>Policy SP18: Conservation of the Historic Environment</p> <p>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,</p>	<p>Concerns regarding flexibility of Policy SP18</p>	<p>Comments noted. Any future planning proposals affecting a site or Area of Archaeological Significance will need to demonstrate compliance with Policy SP18 and the supporting development management policies. The supporting text to the policy at paragraph 5.5.92 is quite clear of the need for high quality design and carefully sited development that is both in keeping and scale with its location, and which is sensitive to the character of the historic built and natural environment. More often a heritage asset and its setting present a design opportunity where the restoration, incorporation and sustainable reuse of historic buildings or features helps to strengthen local identity (respecting local design characteristics) and the sense of place to the benefit of local communities and businesses.</p>

	rather than necessarily requiring preservation/enhancement in situ.		
554	I agree that things should be looked after	No changes proposed	Comments noted
287	No		Comments noted
253	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 biodiversity 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 green infrastructure assets are valued, protected, enhanced and managed through a green infrastructure network. DNP8 clearly states that all major developments will be required to submit a Green Infrastructure Assessment. Major developments are developments of 10 residential units or more. Such schemes will need to be designed to take into account the existing green infrastructure assets to ensure no fragmentation or loss of connectivity whilst maximising ecosystem resilience and ecosystem services. As such, the proposal to apply these requirements to sites of a larger threshold is not supported. Further guidance on Green Infrastructure as part of development will be prepared as Supplementary Planning Guidance in support of the sustainable placemaking and the creation of high quality and biodiverse living environments.
170	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 green infrastructure assets are valued, protected, enhanced and managed through a green infrastructure network. DNP8 clearly states that all major developments will be required to submit a Green Infrastructure Assessment. Major developments are developments of 10 residential units or more. Such schemes will need to be designed to take into account the existing green infrastructure assets to ensure no fragmentation or loss of connectivity whilst maximising ecosystem resilience and ecosystem services. As such, the proposal to apply these requirements to sites of a larger threshold is not supported. Further guidance on Green Infrastructure as part of development will be prepared as Supplementary Planning Guidance in support of the sustainable placemaking and the creation of high quality and biodiverse living environments.
407	N/A	No changes proposed	Comments noted.

Title: Do you have any comments to make on the key proposals? Maesteg and the Llynfi Valley			
ID	Comment	Summary of changes being sought/proposed	Council response
82	No comments	No changes proposed	Comments noted.
516	I'll let Llynfi Valley residents comment on this.	No changes proposed	Comments noted.
707	Don't know the area.	No changes proposed.	Comments noted.
847	No	No changes proposed	Comments noted.
996	No	No changes proposed	Comments noted.
329	No	No changes proposed	Comments noted.
254	No specific comments to make.	No changes	Comments noted
400	Policy COM1: Housing Allocation Jehu support the allocation of land south east of Pont Rhyd-y-cyff (Site Ref.	No changes proposed – supports COM1(3) as a	Comments noted. Preparation of the Replacement LDP has involved the assessment of 171 candidate sites. Each candidate site has been assessed against the criteria in the Candidate Site Assessment Methodology which was previously

<p>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)).</p> <p>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.</p> <p>Water and Flood Risk</p> <p>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 discharge in the River Llynfi, the site is capable of delivering development which is</p>	<p>separate housing allocation.</p> <p>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).</p>	<p>consulted upon (See Appendix 13 – Candidate Sites Assessment Report (2020)). During the 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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>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).</p> <p>It is fully acknowledged that Jehu have reaffirmed commitment to 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. 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 SA10b Water and Flood Risk in the SA Report in anticipation of this adverse effect being mitigated, rather ensure any development proposal complies with appropriate policy-level mitigation to avoid otherwise predicted individual likely significant adverse effects occurring at planning application stage.</p>
--	---	--



<p>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).</p> <p>Landscape</p> <p>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 landscape</p>	<p>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 SA14a (Landscape).</p>	<p>It is fully acknowledged that Jehu have commissioned 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 mitigation to avoid otherwise predicted individual likely significant adverse effects occurring at planning application stage.</p>
---	--	--

<p>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.</p> <p>Conclusion</p> <p>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</p>		
---	--	--

	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	No changes proposed – Ewenny Road site needs regenerating	Comments noted.  The Ewenny Road site is located within the existing urban area of Maesteg which is identified as a Regeneration Growth Area (as defined by SP1). The proposed development of the site presents a significant opportunity for the future regeneration of the area and would play a significant step in the revitalisation of Maesteg. Comprehensive development would improve the appearance of the site, whilst also providing homes for new residents, new job opportunities and facilities for local people. The site is located in a sustainable location for new residential development due to the proximity to the town centre, public transport and education provision. To this end, Policy PLA8 (7) safeguards part of the site for the provision of a new park and ride facility. This will provide an opportunity for effective interchange between active travel, public transport and cars to facilitate a reduction in the length and number of car-borne journeys, especially for the journey to work. This site is allocated as a long-term regeneration site ((COM1 (R2)), which the Council will remain committed to, but not rely on to 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 future regeneration of the area and would play a significant step in the revitalisation of Maesteg. The LDP acknowledges that this brownfield regeneration site will require remediation-based viability issues to be addressed before it can be taken forward and the site is in an area characterised by low house prices and little development activity. Therefore the site is allocated as a long-term regeneration site, which the Council will remain committed to, but not rely on to help deliver the housing requirement. In this way, the remediation strategy, necessary enabling works and master planning can be progressed in a manner that ensures the future redevelopment of the site can have the 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 allocations within Pont Rhyd-y-cyff, these being Land South East of Pont Rhyd-y-cyff (ref. COM1(3)) and Land South West of	No changes proposed – support allocation of Land South of Pont Rhyd-y-Cyff (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

<p>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.</p> <p>Suitability, Viability and Deliverability</p> <p>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.</p> <p>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.</p> <p>With regards to the representations submitted to date, they have demonstrated that the site is inherently suitable for</p>		
---	--	--

<p>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.</p> <p>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.</p> <p>Summary</p> <p>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.</p> <p>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.</p>		
--	--	--

400	<p>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)).</p> <p>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:</p>	None – supports COM1(3)	Comments noted (refer to Candidate Site Assessment).
	<p><b>Water and Flood Risk</b> 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</p>	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).	<p>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).</p> <p>It is fully acknowledged that Jehu have reaffirmed commitment to 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. 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 SA10b Water and Flood Risk in the SA Report</p>

<p>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).</p>		<p>in anticipation of this adverse effect being mitigated, rather ensure any development proposal complies with appropriate policy-level mitigation to avoid otherwise predicted individual likely significant adverse effects occurring at planning application stage.</p>
<p><b>Landscape</b> 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</p>	<p>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 SA14a (Landscape).</p>	<p>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).</p> <p>It is fully acknowledged that Jehu have commissioned 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 mitigation to avoid otherwise predicted individual likely significant adverse effects occurring at planning application stage.</p>

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-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 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.	<p>No action is considered necessary. Three sites within this area are proposed allocations that are counted as part of the immediate housing land supply ((COM1(3) Land South East of Pont Rhyd-y-cyff, COM1(4) Land South of Pont Rhyd-y-cyff and COM1(5) and Land South West of Pont Rhyd-y-cyff)). These are all new allocation proposals and each site promoter has robustly demonstrated delivery in accordance with the requirements set out in the Development Plans Manual. Indeed, a detailed body of evidence has been provided to the Council in this respect, including a Statement of Common Ground between three site promoters to confirm the collective deliverability and saleability of the sites. This process has provided a high degree of confidence that the sites are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. This is clearly outlined within the Candidate Site Assessment. An appropriate delivery trajectory has been formulated in close dialogue with the three site promoters, considering delivery timescales and sales rates across all three sites, taking account of the local housing market.</p> <p>The other three sites proposed within this vicinity are brownfield regeneration allocations within the existing LDP that the Council intends to 'rollover' and re-allocate as Long-Term Regeneration Sites. These include Maesteg Washery, Coegnant Reclamation Site (Caerau) and the Former Cooper Standard Site, Ewenny Road (Maesteg). The retention of such sites represents a necessary degree of continuity with the first adopted LDP, which is essential to implement the long-term regeneration strategy embodied within the Replacement LDP Vision. However, for the avoidance of doubt, and in accordance with national policy, these Long-Term Regeneration Sites are not included as a component of housing supply. The housing land supply will therefore not be dependent on their delivery, in recognition of the fact that they require longer lead-in times, preparatory remediation-based enabling works and/or more detailed strategic master plans before they can come forward. Whilst Long-Term Regeneration sites will still be allocated in the plan to enable their delivery, they will not be relied upon as contributing to the housing requirement and will also not be included in the windfall allowance. They are essentially 'bonus sites', notwithstanding the fact that these significant brownfield sites are highly conducive to sustainable development and delivery of the full range of placemaking principles outlined in Planning Policy Wales. This is clearly referenced within the Housing Trajectory Background Paper. Therefore, whilst the representor's concerns regarding these sites are noted, they are considered inconsequential to delivery of the Replacement LDP's housing requirement. This is considered in further detail within the Spatial Options Background Paper, the Minimising the Loss of the Best and Most Versatile (BMV) Agricultural Land Background Paper and the Candidate Site Assessment.</p>
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 changes being sought/proposed	Council response
82	BDW's comments in relation to the proposed Porthcawl Waterfront site are detailed in the response to Question 3 above. To summarise, whilst BDW support the development of this mixed-use regeneration site, and understands that	Change to housing trajectory for Porthcawl Waterfront	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

	<p>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 be considered further.</p>		<p>period (including those sites with planning permission and new housing allocations) following conclusion of the Stakeholder Group Meeting.</p> <p>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 Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p> <p>Furthermore, the proposal to include Candidate Site 312.C1 is not supported and is also contrary to the Spatial Strategy. The total level of housing provision within the Deposit Plan is set appropriately with a flexibility allowance to ensure delivery of the housing requirement, taking into account the potential for non-delivery and unforeseen issues in accordance with the Development Plans Manual.</p>
136 6	<p>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.</p> <p><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</p>	<p>See below.</p> <p>Change to housing trajectory for Porthcawl Waterfront</p>	<p>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 and 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</p>

<p>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.</p> <p><b>Land East of Pyle</b> 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</p>	<p>Land East of Pyle Allocation to be considered via the forthcoming SDP rather than the Replacement LDP</p>	<p>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 Porthcawl Waterfront’s trajectory is both unsubstantiated and not supported.</p> <p>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.</p> <p>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.</p>
---	--	--

	<p>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.</p> <p>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 completions as the promoter suggest.</p>		<p>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.</p>
511	<p>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 a leisure centre years ago!! Where is it? The</p>	<p>Concerns regarding proposed foodstore in Porthcawl / Strategic Allocation PLA1: Porthcawl Waterfront</p>	<p>The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>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.</p> <p>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</p>

<p>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</p>		<p>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.</p> <p>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.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>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 PLA1 – Page 63). The provision of new residential units, including affordable dwellings, will enable the delivery of other vital regeneration requirements comprising flood defences, public open space, leisure, enhanced active travel links plus education, retail and community facility provision.</p> <p>A Placemaking Strategy has been developed and produced of which provides the framework to deliver the broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical development of the waterfront in this manner will improve the attractiveness of the town as a place to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader settlement of Porthcawl to thrive and prosper.</p> <p>In terms of Salt Lake, development will include a new food store, residential (including affordable housing), supporting commercial uses and leisure. With regards to leisure, an area north of the harbour within Salt Lake will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but also act, with others, to set a quality benchmark which will also need to be achieved elsewhere.</p>
---	--	---

			<p>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 encouraged. This mix of uses will help bring life and vitality during the day and into the evening.</p> <p>Sandy Bay will accommodate public open space, residential, education provision and commercial. In terms of open space, Policy PLA1 requires development of Porthcawl Waterfront to incorporate Green Infrastructure and Outdoor Recreation Facilities of which are to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p> <p>Additionally, there are plans for creating new facilities at Cosy Corner, including community facilities whilst also creating employment opportunities. The plans for Cosy Corner include an all-new stone and glass-clad building which will feature new premises suitable for retail and start-up enterprises. The council also wants to create new meeting space for community use, a parade square for the Sea Cadets and an office for the harbour master as well as changing facilities for users of the nearby marina. If funding allows, plans are in place that will further enhance the scheme with new landscaping, public seating, a children’s play area and a canopy structure capable of providing comfortable outdoor shelter from rain and the sun.</p> <p>Strategic Policy 16: Tourism and supporting development management policies will promote tourism development. The LDP will also provide the framework for the provision and protection of well-located, good quality, tourism, sport, recreation and leisure facilities and to diversify tourism in the County including Porthcawl, thereby contributing to the Aims and Priorities of the Bridgend County Destination Management Plan (2018-2022) (See Appendix 30).</p> <p>Proposals for the Porthcawl Waterfront Regeneration site are currently being developed further as part of a ‘Placemaking Strategy’ that represents a form of sub area masterplanning supported by illustrative design material. This will provide a coherent basis for guiding development, securing future funding, attracting investors and delivering a comprehensive range of regeneration projects. I urge you to participate in the public engagement events being facilitated by Austin-Smith: Lord. In addition, any future development proposals for this site will be subject to a formal planning application where you can also have your say.</p> <p>In terms of the proposed foodstore, evidence confirms (See Appendix 16 – Retail Study) that the centre fulfils its function as a town centre and performs well against most indicators of vitality and viability. However, the centre has a limited convenience offer which is significantly below the UK average. Although the centre contains a range of smaller food stores suitable for top-up shopping, there is only one large supermarket suitable for main food shopping. This provides limited consumer choice and means that most residents must travel to other centres to meet their needs.</p> <p>Marketing for a new foodstore was carried out in autumn 2020 whereby numerous bids (five in total) were received and appraised. A robust selection process in which each bid was carefully assessed against a planning development brief resulted in Aldi Stores Ltd being identified as the preferred bidder. The planning development brief required bidders to submit high-quality, bespoke designs for premises that could act as ‘gateway buildings’ as well as incorporating appropriate access and active travel arrangements. The development brief for the food store site does not prescribe a particular architectural approach, but it does require clear attention to “place-making”, taking in account the historic urban form and scale of the surrounding area. This will enable a development designed for human interaction and enjoyment whilst responding to and celebrating the maritime setting, cultural and heritage of Porthcawl. Cabinet members approved the disposal of the site to Aldi Stores Ltd, and delegated authority to officers to approve the terms of the disposal agreement.</p> <p>The food store site forms a key element of the wider masterplan that has been worked up for the Porthcawl Waterfront Regeneration Scheme and is intended to act as a precursor to, and catalyst for, future phases of</p>
--	--	--	--

			<p>development across the wider site. Subject to a planning application, the foodstore will be constructed alongside all-new residential, leisure, retail development at Salt Lake as well as new areas of green open space, bus terminus, active travel facilities and more.</p> <p>In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car par enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p> <p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans.</p>
516	I'll let Porthcawl, Pyle, North Cornelly and Kenfig Hill residents comment on this.	No changes proposed.	Comments noted.
707	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?	Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront / proposed food store	<p>Comments noted. 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.</p> <p>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.</p> <p>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.</p>

			<p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>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 PLA1 – Page 63). The provision of new residential units, including affordable dwellings, will enable the delivery of other vital regeneration requirements comprising flood defences, public open space, leisure, enhanced active travel links plus education, retail and community facility provision.</p> <p>A Placemaking Strategy has been developed and produced of which provides the framework to deliver the broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical development of the waterfront in this manner will improve the attractiveness of the town as a place to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader settlement of Porthcawl to thrive and prosper.</p> <p>In terms of Salt Lake, development will include a new food store, residential (including affordable housing), supporting commercial uses and leisure. With regards to leisure, an area north of the harbour within Salt Lake will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but also act, with others, to set a quality benchmark which will also need to be achieved elsewhere.</p> <p>In terms of the proposed foodstore, evidence confirms (See Appendix 16 – Retail Study) that the centre fulfils its function as a town centre and performs well against most indicators of vitality and viability. However, the centre has a limited convenience offer which is significantly below the UK average. Although the centre contains a range of smaller food stores suitable for top-up shopping, there is only one large supermarket suitable for main food shopping. This provides limited consumer choice and means that most residents must travel to other centres to meet their needs.</p> <p>Marketing for a new foodstore was carried out in autumn 2020 whereby numerous bids (five in total) were received and appraised. A robust selection process in which each bid was carefully assessed against a planning development brief resulted in Aldi Stores Ltd being identified as the preferred bidder. The planning development brief required bidders to submit high-quality, bespoke designs for premises that could act as ‘gateway buildings’ as well as incorporating appropriate access and active travel arrangements. The development brief for the food store site does not prescribe a particular architectural approach, but it does require clear attention to “place-making”, taking in account the historic urban form and scale of the surrounding area. This will enable a development designed for human interaction and enjoyment whilst responding to and celebrating the maritime setting, cultural and heritage of Porthcawl. Cabinet members approved the disposal of the site to Aldi Stores Ltd, and delegated authority to officers to approve the terms of the disposal agreement.</p>
--	--	--	---



			The food store site forms a key element of the wider masterplan that has been worked up for the Porthcawl Waterfront Regeneration Scheme and is intended to act as a precursor to, and catalyst for, future phases of 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 at the beach, driving tourists to resorts in neighbouring areas.	Where is the planned provision of additional town/beach parking for Porthcawl?	<p>Comments noted. In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car park enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p> <p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans. In terms of the proposed park and ride facility in Pyle, whilst it is not likely to be delivered in the short term due to the limits of the current City Deal funding programme, the scheme will remain a long term goal for the authority. However, funding will be invested into the proposed bus terminus.</p>
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	<p>Comments noted. 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.</p> <p>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.</p> <p>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</p>

<p>do not own the land between the lane and the boundary wall. it is yours". We then proceeded to perform land drain work to prevent recurrence of the flooding to our properties and have maintained the land 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 bequeathed 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 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 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 abandoned on banks and verges, as well as residential streets becoming clogged, causing problems for both visitors and residents alike, The stress and anguish this parking would generate for the residents is wholly unacceptable. Relocation of the Funfair to the Sandy Bay Bowl 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 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 weekends and after office hours. The</p>		<p>growth, demonstrating capacity for sustainable growth based on its accessibility, availability of amenities and employment provision in the context of its existing population base.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>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 PLA1 – Page 63). The provision of new residential units, including affordable dwellings, will enable the delivery of other vital regeneration requirements comprising flood defences, public open space, leisure, enhanced active travel links plus education, retail and community facility provision.</p> <p>A Placemaking Strategy has been developed and produced of which provides the framework to deliver the broader vision for Porthcawl; which aims to create a premier seaside resort of regional significance through the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. It also proposed to retain and improve upon areas of attractive open space within Griffin Park, whilst creating significant new areas of open space along the seafront, supplemented with high quality active travel routes that traverse the entire site between the harbour and Trecco Bay. Physical development of the waterfront in this manner will improve the attractiveness of the town as a place to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader settlement of Porthcawl to thrive and prosper.</p> <p>In terms of Salt Lake, development will include a new food store, residential (including affordable housing), supporting commercial uses and leisure. With regards to leisure, an area north of the harbour within Salt Lake will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but also act, with others, to set a quality benchmark which will also need to be achieved elsewhere.</p> <p>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 encouraged. This mix of uses will help bring life and vitality during the day and into the evening.</p> <p>Sandy Bay will accommodate public open space, residential, education provision and commercial. In terms of open space, Policy PLA1 requires development of Porthcawl Waterfront to incorporate Green Infrastructure and Outdoor Recreation Facilities of which are to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p> <p>With respect to traffic, the Council recognises that any development growth will likely result in greater travel demand, and that increased traffic levels and congestion is likely to occur if appropriate mitigating transport measures and infrastructure are not delivered. Therefore a Strategic Transport Assessment has been undertaken to consider the impact of plan proposals and help guide and inform the process of delivering land allocations by means of modelling and quantifying the transport impact of these proposals. The technical notes</p>
---	--	---

<p>proposals of the LDP seem to suggest that Porthcawl will cease to be a vibrant seaside town and become a commuter town with 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 residents directly affected not having to rely on Jamie Wallis to notify them.</p>		<p>accompanying this assessment demonstrate that the proposed level of development detailed within the LDP can be accommodated within the BCBC Highway Network with suitable mitigation.</p> <p>Furthermore, Policy PLA1 ensures that development of the site will require a new roundabout and link road to enable access to the Sandy Bay development parcels. Highway improvements will also be required to ensure that the principal point of vehicular access for a foodstore is off the Portway roundabout. Off-site highway improvements will also be required of which they must have regard to the requirements arising from the Transport Assessment and as identified in the Transport Measures Priority Schedule.</p> <p>In terms of the potential environmental impact, a Phase 1 Habitat Survey has been undertaken, of which robustly determines what ecology constraints may exist within the site. The findings indicate that the proposed development would not have any adverse impact. Whilst further surveys will be undertaken, the proposed development of the site is not unacceptably constrained by biodiversity and nature conservation issues. Ecological constraints will be mitigated by retaining and providing suitable buffers to habitats, particularly the relict dunes to the rear of Sandy Bay, of which are a nationally protected habitat for which BCBC are obliged to protect and enhance.</p> <p>Policy PLA1 will also ensure that green infrastructure can be incorporated as an intrinsic element of future detailed proposals across the regeneration area. There are a number of potential options for green infrastructure design that could be incorporated as part of future development within the regeneration area including the following:</p> <ul style="list-style-type: none"> <li>• Create an extensive viable network of green corridors and natural habitat throughout development which connects larger or more expansive open spaces for both people and wildlife designed around existing site assets;</li> <li>• Provide pleasant, safe and linear routes for active travel such as walking and cycling for utility, recreation and health promotion;</li> <li>• Ensure where possible streets and roads are tree-lined or contain soft landscaping appropriate to local character, habitats and species within the area;</li> <li>• Utilise SUDs to provide additional multi use green space and enhance connectivity between habitats for enhanced biodiversity;</li> <li>• Include bat boxes, bricks or lofts and bird boxes on all housing, to reflect the species within the area;</li> <li>• Harvest, store and re-use rainwater in low carbon systems;</li> <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 linking them to homes and schools;</li> <li>• Enhance the transport system and help reduce effects of air pollution through the provision of verges of priority habitat, hedgerow, wildflower rich or rough grassland;</li> <li>• Provide public access to green infrastructure assets where appropriate; and</li> <li>• Incorporate insect attracting plants, hedgerows, log piles, loggaries and other places of shelter for wildlife refuge/hibernation within structural landscaping and open spaces.</li> </ul> <p>In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car park enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p>
--	--	---

			<p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans. In terms of the proposed park and ride facility in Pyle, whilst it is not likely to be delivered in the short term due to the limits of the current City Deal funding programme, the scheme will remain a long term goal for the authority. However, funding will be invested into the proposed bus terminus.</p> <p>In terms of consultation, it is the view of the Council that the overall objectives of the Community Involvement Scheme (CIS) as originally set out in with the approved Delivery Agreement, including the CIS have been met. It is also considered that the LDP has been prepared in accordance with the LDP 'Preparation Requirements' set out in the Development Plans Manual (Edition 3).</p> <p>The Council previously consulted the public on the Preferred Strategy of which was held from 30th September to 8th November 2019. Following the public consultation period the Council was required to consider all representations made in accordance with LDP Regulation 16(2) before determining the content of the deposit LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 – Preferred Strategy &amp; Initial Consultation Report) for publishing. This report was subsequently signed off by members of Council.</p> <p>As part of Stage 4 of the Delivery Agreement, the Council was required to undertake Deposit public consultation for a statutory period of 6 weeks, however the Council made an allowance for 8 weeks in order to maximise public participation. This was to ensure a range of views could be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. A number of consultation methods were used to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods included:</p> <ul style="list-style-type: none"> <li>• A Legal Notice was placed within the Glamorgan Gazette on 3rd June 2021</li> <li>• The package of consultation documents were made available online via Bridgend County Borough Council's Website (<a href="http://www.bridgend.gov.uk/ldpconsultation">www.bridgend.gov.uk/ldpconsultation</a>). Respondents were able to complete an electronic survey online to make a formal representation.</li> <li>• Printed reference copies were placed within public facing Council buildings, including every library in the County Borough (fixed and mobile), subject to social distancing guidelines. The reference copies were also available to view at the Council's Civic Offices in Angel Street, Bridgend, although by appointment only as the offices had not re-opened to the public due to the pandemic. Hard copies of the survey form were also been made available at these locations for members of the public to complete by hand.</li> <li>• Dissemination of hard copies of information to individuals. Members of the public were able request a copy of the survey by post to complete by hand (free of charge). There was a £25 charge for a hard copy of the whole Deposit Plan to cover printing and postage costs for such a large document.</li> <li>• Every individual and organisation on the LDP Consultation Database was notified by letter or email (depending on their preference) to inform them of the availability of the Deposit Consultation. 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.</li> </ul>
--	--	--	--

			<ul style="list-style-type: none"> <li>• Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in Bridgend County Borough.</li> <li>• 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.</li> <li>• Planning Officers have presented the consultation remotely to established working groups, including the 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 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 <a href="mailto:ldp@bridgend.gov.uk">ldp@bridgend.gov.uk</a> or telephoning 01656 643633.</li> </ul> <p>Posters were sent to all Town and Community Councils to display on their notice boards.</p>
329	No	No changes proposed	Comments noted.
223	<p>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.</p> <p><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.</p>	Change to housing trajectory for Porthcawl Waterfront	<p>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 and 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 Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p>

<p><b>Land East of Pyle</b>  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.</p> <p>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</p>	<p>Land East of Pyle Allocation to be considered via the forthcoming SDP rather than the Replacement LDP</p>	<p>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.</p> <p>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.</p> <p>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</p>
---	--	--

<p>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.</p> <p>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 &amp; 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</p>		
--	--	--

<p>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:</p> <ul style="list-style-type: none"> <li>- Proximity to health facilities</li> <li>- Proximity to Primary Education Infrastructure</li> <li>- Proximity to Congestion Pinch Points</li> <li>- Water Supply Score</li> <li>- Sewerage Score</li> <li>- Proximity to European Sites (recreational pressure)</li> <li>- Proximity to European Sites (SAC)</li> <li>- Proximity to SSSI</li> <li>- Proximity to Ancient Woodland</li> <li>- Proximity to RIGS</li> <li>- Presence of Valued Habitats and Species</li> <li>- Proximity to Flood Risk Zones</li> <li>- Proximity to Main Rivers and Lakes</li> <li>- Previously Developed Land or Greenfield Land</li> <li>- Proximity to Scheduled Monuments</li> <li>- Proximity to Listed Buildings</li> <li>- Proximity to SLA or Heritage Coast</li> <li>- Visual Amenity Impact</li> </ul> <p>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.</p> <p>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</p>		
---	--	--



<p>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.</p> <p>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.</p> <p>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:</p>		
---	--	--

- 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

<p>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.</p> <p><b>Housing Trajectory</b> 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</p>		
---	--	--

	<p>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.</p> <p><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.</p>		
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 been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg

			University Health Board. This will be key to service provision planning as site allocations within the Deposit Plan 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	<p>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.</p> <p><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.</p> <p><b>Land East of Pyle</b> Despite Pyle being a main settlement and considered a Sustainable Growth Area within the DCD spatial and growth</p>	<p>See below.</p> <p>Change to housing trajectory for Porthcawl Waterfront</p> <p>Land East of Pyle Allocation to be considered via the</p>	<p>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 and 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 Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p> <p>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</p>

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.

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

forthcoming SDP rather than the Replacement LDP

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 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.

	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.		
253	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.	Change to housing trajectory for Porthcawl Waterfront.	<p>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.</p> <p>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 Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p>
170	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	<p>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 that this site can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment).</p> <p>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 Porthcawl Waterfront's unit capacity is both unsubstantiated and not supported.</p>

116 5	<b>Re-consideration of the Porthcawl Waterfront Allocation</b>	Re-allocate Porthcawl Waterfront as a Long-Term Regeneration Site	<p>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.</p> <p>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. In summary therefore, the proposal to alter Porthcawl Waterfront to a Long-Term Regeneration Allocation is both unsubstantiated and not supported.</p>
----------	--	---	--

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 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



	<p>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 &amp; 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 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 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).</p>		
306	<p><b>Re-consideration of the Porthcawl Waterfront Allocation</b></p>	<p>Re-allocate Porthcawl Waterfront as a</p>	<p>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</p>

<p>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 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.</p> <p>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</p>	<p>Long-Term Regeneration Site</p>	<p>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.</p> <p>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. In summary therefore, the proposal to alter Porthcawl Waterfront to a Long-Term Regeneration Allocation is both unsubstantiated and not supported.</p>
---	------------------------------------	--

	<p>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 &amp; 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).</p>		
120 9	<p><b>Land East of Pyle (SP2(5))</b> Considerable, and detailed submission have been made to-date in conjunction with discussions with the Local Authority, and other statutory bodies such as National Rail and DCWW to promote and confirm the unequivocal deliverability of this site as set</p>	<p>Support for Land East of Pyle (SP2(2)), with proposed wording modifications to PLA5.</p>	<p>The representor's comments are noted, although the proposed changes to PLA 5 are not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p>

<p>out in the proposed trajectory of the Deposit LDP.</p> <p>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.</p> <p>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</p> <ul style="list-style-type: none"><li>a) Confirm SUDS / SAB requirements are accommodated; and</li><li>b) confirm placemaking requirements of PPW11 and Future Wales Plan; and</li><li>c) confirm the above matters don't impact the proposed quantum as part of the allocation – thus not undermining the allocation;</li></ul> <p>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.</p> <p>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.</p> <p>Policy Wording of Land East of Pyle (SP2(5))</p>		
---	--	--

<p>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 pre-application 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.</p> <p>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.</p> <p>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 decision-maker (The Local Authority).</p> <p><b>Masterplan Development Principles</b></p> <p>This development <del>must</del> should accord with the following principles, which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. A masterplan <del>must</del> 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:</p> <p>a) Create a well-connected sustainable urban extension to Pyle, North Cornelly and Kenfig Hill, comprising a number of character areas that integrate positively</p>		
---	--	--

<p>with the existing Town Centres, existing housing clusters, community facilities, Active Travel networks and public transport facilities;</p> <p>b) Create a multi-functional green infrastructure network within the site that facilitates active travel, taking account of the need to create healthy communities. <del>There must be</del> 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;</p> <p>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. <del>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;</del> 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.</p> <p>d) Pursue transit-orientated development that prioritises walking, cycling and public transport use, <del>whilst reducing private</del></p>		
---	--	--

~~motor vehicle dependency.~~ It is considered superfluous 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 offer. Well designed, safe walking and cycling routes must be incorporated throughout the site to foster community orientated, healthy, walkable neighbourhoods. Connections must also 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 Cynffig 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

f) Provide a mix of higher densities at key points in the layout and lower densities on the rural/sensitive edges.

#### **Development Requirements**

The development must provide the following:

1) Circa 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 sustainable clusters of no more than ten units as per the Council's requirements;

2) ~~5.7 hectares of land to accommodate~~ 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. 2 two form entry primary schools with co-located nursery facilities and a 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 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;



<p>7) A new pedestrian and cycle bridge over the existing railway line and along A48/Pyle Road to provide safe pedestrian and cycle linkages between the site and Pyle. <del>The bridge must be constructed to Council adoptable standards prior to the occupation of any homes on the development;</del> 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</p> <p>8) Off-site highway improvements with regard to the requirements arising from the Transport Assessment and as identified in the Transport Measures Priority Schedule;</p> <p>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;</p> <p>10) Suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland), and SINCs;</p> <p>11) <del>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;</del> Considered superfluous given this is effectively covered by criterion 9 above. Such Management Plans would need to feature in any planning application (conditionally)</p>		
---	--	--

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.

The site is allocated for a comprehensive residential-led mixed use scheme, including a local commercial centre, 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 east 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 of 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 will 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

	<p>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.</p> <p>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.</p>		
222	<p><b>Land East of Pyle</b></p> <p>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.</p> <p>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</p>	<p>De-allocate Land East of Pyle due to lack of deliverability information.</p> <p>De-allocate Land East of Pyle from the Replacement LDP and re-consider through the forthcoming SDP</p>	<p>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. Contrary to the representor's statement, all landowners are committed to working towards ensuring a development site that can be delivered as a comprehensive development. 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 representor's concerns are both unsubstantiated and not supported.</p> <p>No action is considered necessary. Work on the SDP has not yet commenced 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</p>

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 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.

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

Proposal to allocate Land at Heol Fach, North Cornelly to enable shorter-term housing delivery

Query on Land East of Pyle's affordable housing contribution

dialogue with Neath Port Talbot County Borough Council throughout plan preparation. Neath Port Talbot County Borough Council has submitted formal representations on the Bridgend Deposit Plan, 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 de-allocate the site and 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 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 rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. As outlined within the Development Plans Manual, "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. The two are not contradictory, rather the site specific being a refinement of the high level appraisal" (WG, 2020, para 5.89). Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council's aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3.

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 the Replacement LDP (see also to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). The Plan's contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation 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.

#### **Candidate Site Assessment**

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

policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents 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 a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the level of housing need within the County Borough, which the Council will seek to address through a range of market interventions as far as practically deliverable. These complementary sources of supply include, although are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.

Despite the representor's claims (in relation to Land East of Pyle) that "it is not clear whether the full 300 affordable units will be delivered in the RLDP period or split across the following plan period", Table 3 within the Affordable Housing Background Paper clearly states that the 300 affordable units are earmarked for delivery within the Replacement LDP period. These units have been incorporated into the Replacement LDP affordable housing target. The delivery phasing would be secured through a future s106 agreement.

Contrary to the representor's statement, all landowners are committed to working towards ensuring a development site that can be delivered as a comprehensive development.

In terms of the potential flood risk, the site promoter has provided illustrative masterplans, which document that no built form will be provided in the northern section of the site and that this will be appropriately used for public open space. Development will be located away from this area of land and confined solely to areas within DAM Zone A (Areas at little or no risk of flooding). Areas at high risk of flooding are to be confined to uses which are of low vulnerability to flooding, such as Public Open Space or SuDS.

With respect to adjacent or nearby designations, the site promoter has submitted an ecology report, which confirms there is an adjacent partial SSSI/SAC (Cefn Cribwr Grasslands), designated for its purple moor-grass meadows and marsh fritillary butterfly presence. This designation is separated from the site by a road and railway line to the north of the north-east corner. No devil's bit scabious or purple moor-grass was found on-site during the field visit, with the land either grazed by sheep or cattle, or cut for hay/silage. No negative impacts are anticipated on this designated site, or any others within the local area (including Stormy Down SSSI, found to the immediate south-east of the site). As stated in the Candidate Site Assessment Report, "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".



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.

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

De-allocate Land East of Pyle due to unknown impact on archaeological remains

Query on Land East of Pyle's effect on SA Objective 12a (Sustainable Placemaking)

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 states, "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.

### 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.

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 it is 'physically detached' from the grouped settlement

De-allocate Land East of Pyle as the full impact on the highway network and cost of mitigation remains unknown

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.

Land East of Pyle is appropriately located to connect to a range active travel opportunities that will foster community orientated, healthy, walkable neighbourhoods. Pyle Railway station is located in close proximity to the north west of the site, and, in addition, Pyle and Kenfig Hill District Centres are also approximately 1km and 1.5km to the north of the site, respectively. Proposed policy PLA5 sets out a number of masterplan development principles in order to 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.

The proposed development requirements (within PLA5) include new shared footways, cycleways and improved crossing facilities along the A48 and A4229, along with highway improvements to enhance pedestrian safety in the vicinity of the site. Critically, a new pedestrian and cycle bridge would be required over the existing railway line and along A48/Pyle Road to provide safe pedestrian and cycle linkages between the site and Pyle. This will ensure improved linkages 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 would need to 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. The development requirements as set out within PLA5 will enable transit-orientated development that prioritises walking, cycling and public transport use, whilst reducing private motor vehicle dependency. As such, the proposed policy framework is considered appropriate to address the representor's concerns regarding the site being 'physically detached'.

Contrary to the representor's statement, a Transport Assessment has been prepared by the site promoter to examine the highway and transportation issues associated with Land East of Pyle. The report discusses the following key transportation issues arising from the proposals: (i) the existing site location and transport infrastructure; (ii) analysis of personal injury traffic accident data (iii) the site's compliance with applicable transport policy; (iv) the development proposal; (v) development-generated vehicular traffic; and (vi) development impact on the surrounding highway network. The Assessment concluded that there are no reasons, in highway and transportation terms, why the site should not be allocated for development in the replacement LDP. The proposed site accesses will be taken via three separate junctions, one on the A4229 and two on the A48. The site is also favourably positioned to contribute significantly towards Bridgend's integrated transport strategy and help deliver local active travel improvements to Pyle, North Cornelly, South Cornelly, Porthcawl and Bridgend in line with the Active Travel Wales 2013 Act. Capacity analysis has been undertaken and the results identify that of the seven junctions assessed, only two are forecast to experience queueing and delay that may warrant mitigation as part of the development of the site. Following a preliminary accident investigation there are also no evident clusters and therefore no obvious highway safety concerns within the vicinity of the application site.

An STA has also been undertaken to consider the impact of plan proposals and help guide and inform the process of delivering land allocations by means of modelling and quantifying the transport impact of these proposals. The STA demonstrates that the proposed level of development detailed within the LDP can be accommodated within the BCBC Highway Network with suitable mitigation. Appropriate mitigation measures have been factored into Land Easy of Pyle's viability appraisal.

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.

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 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

De-allocate Land East of Pyle as the costs of the new footbridge could render the scheme unviable

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

Land East of Pyle is supported by a comprehensive and independently verified viability assessment, which has factored in appropriate costs for the new pedestrian and cycle bridge (and, indeed, all other appropriate infrastructure costs). This clearly demonstrates that the development is viably able to fund supporting infrastructure. Therefore, the representor's concerns are unfounded and not supported.

Whilst any future station relocation plans would only serve to further enhance the site's sustainable location and maximise active travel opportunities, the proposed allocation is not dependent on the station being relocated. The allocation would also not be required to fund any associated costs to render it acceptable in planning terms. Contrary to the representor's assumption, therefore, Land East of Pyle has not been proposed for allocation due to the potential re-location of Pyle Railway Station. It is factually inaccurate to state "these are significant costs which will have a bearing on the viability and deliverability of the allocation". Any future mixed use development of this site would be progressed independently of the potential station re-location. As clearly stated proposed Policy PLA5, any proposal must "ensure that the development does not prejudice the proposed future relocation of Pyle Railway Station plus accompanying park and ride facility". The rationale for the proposed allocation is clearly set out in the Candidate Site Assessment Report and conforms with the Settlement Assessment, Spatial Strategy and LHMA.

The Estimated Commuter Additional Trips and Rail Infrastructure 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. TfW have been working alongside Bridgend County Borough Council to provide existing railway capacity and future changes and improvements to the rail network, and identifying if any new infrastructure (or improvements to existing infrastructure) is required to support the proposed allocations. The Background Paper provides a comprehensive review of various technical studies that have taken place since the existing LDP was adopted, as well as analysing 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. The representor claims that the Paper has assessed 1,000 units at Land East of Pyle and "if consideration was given 2,000 units being delivered on land east of Pyle the train services would be over capacity". However, no evidence has been provided to substantiate these claims. 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 undertaken, in reality it 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 re-consider 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

<p>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 Pyle / 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.</p>		<p>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.</p>
<p><b>Land at Heol Fach, North Cornelly</b></p>	<p>Allocate Land at Heol Fach, North</p>	<p>The representor has submitted a comprehensive viability assessment for Land at Heol Fach, North Cornelly. Therefore, demonstrating that the site is viable and deliverable.</p>

<p>Bellway has been promoting the land at Heol Fach from the outset of the RLDP process. Substantial technical and viability information has been provided to the Council at each stage of the process to demonstrate that the site is both viable and deliverable within the first phase of the RLDP period. Despite the detailed submissions to the Council, land at Heol Fach has not been considered for allocation in the DCD. As outlined above, Bellway consider the omission of land at Heol Fach 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</p>	<p>Cornelly because the site promoter claims a Viability Assessment was submitted as part of the additional information submitted to the Candidate Site Stage 2 submissions in September 2020</p>	<p>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 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.</p>
--	---	--



	<p>also education capacity issues in the area whereby a site of this size would further exacerbate without the ability of resolving them. As such, there are considered to be other sites more issues. Therefore, this site will not be allocated in the Deposit Plan.” Bellway are disappointed with the reason for the land at Heol Fach not being progressed to an allocation given that a Viability Assessment was submitted as part of the additional information submitted to the Candidate Site Stage 2 submissions in September 2020. Notwithstanding that the cover letter welcomed further discussions with the Council relating to viability.</p>		
	<p>In terms of highways issues, Bellway and their technical consultants (Asbri Transport) have had discussions with relevant Highway Officers and submitted further technical work in October 2020. An updated Transport Assessment (TA) prepared by Asbri Transport details the changes made to the scope and methodology of the assessment as suggested by the Council Highway Officers. As set out in the TA access to the site is proposed via a ghost island right turn lane with Heol Fach directly adjacent to the existing residential areas within North Cornelly. The site benefits from pedestrian access from at least five locations on site which are to be retained as part of the proposal. The site is therefore considered highly permeable from a pedestrian perspective. A pedestrian crossing will be provided directly adjacent to the access to the south. At this time it is proposed that the crossing take the form of an uncontrolled pedestrian crossing with central refuge island. This will provide a connection between the 3-metre-wide shared use route on the southern periphery of the proposed access road and the footpath on the opposing side of the B4283 carriageway. The site also connects directly to active travel route PYC1. To the north of the crossing the footpath on the eastern side of the carriageway will be upgraded to allow for an extension of the walking and cycling route directly into the site. To the</p>	<p>Allocate Land at 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.</p>	<p>It is noted that the proposer of the site has submitted a Transport Assessment to support the allocation and the assessment seeks to show that the vehicular traffic generated from the site will not present a material impact on the local highway network.</p>

<p>south of the crossing the footpath will 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.</p>	<p>Allocate Land at Heol Fach, North Cornelly, as the</p>	<p>The representor has submitted a comprehensive viability assessment for Land at Heol Fach, North Cornelly. Therefore, demonstrating that the site is viable and deliverable whilst providing full education contributions. As stated in the Candidate Site Assessment (2022), "The candidate site is located on the periphery on North</p>
<p>In relation to education, it is not unusual for a development of this scale and nature to be subject to Section 106 contributions which</p>		

Bellway would seek to agree with the 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 necessary to address capacity issues.

Sustainability Appraisal Land at Heol Fach 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 base which has informed the Regeneration and Sustainable Urban Growth Led Strategy that is promoted through the Spatial Strategy. The Spatial Strategy

site promoter does not consider it 'fair or helpful' for the site not being progressed due to education capacity issues in the area

Allocate Land at 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

Cornelly which is identified as a Sustainable 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.

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.

As also 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 appropriate proposed allocations 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.

However, 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 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.

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 on 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.

Overall conclusion

In light of the above, Bellway consider the reasons for land at Heol Fach not being 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

Allocate Land at Heol Fach, North Cornelly for the reasons mentioned above

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 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.

	<p>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.</p>		
273	<p><b>Land at Waun Bant Road, Kenfig Hill (ref. 291.C1)</b></p> <p>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.</p> <p>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.</p> <p>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 candidate site submission provides an opportunity for an improvement 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.</p>	<p>Allocate Land at Waun Bant Road, Kenfig Hill (Candidate Site 291.C1)</p>	<p>No action is considered necessary. The Candidate Site Assessment clearly explains why Land at Waun Bant Road, Kenfig Hill (ref. 291.C1) has not been proposed for allocation. The extract is provided below for ease of reference:</p> <p>“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”</p> <p>The proposal to allocate Land at Waun Bant Road, Kenfig Hill is not supported.</p>



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 quality 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

<p>choice of homes for the residents of Kenfig and the wider communities.</p> <p><b>Pen-y-Castell Farm, Kenfig Hill (site ref. 307.C1)</b></p> <p>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.</p> <p>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.</p> <p>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 which would allow for such an allocation.</p> <p>Such a combination 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.</p> <p><b>Conclusion</b></p>	<p>Allocate Pen-y-Castell Farm, Kenfig Hill (Candidate Site 307.C1)</p>	<p>The Candidate Site Assessment clearly explains why Pen-y-Castell Farm, Kenfig Hill (ref. 307.C1) has not been proposed for allocation. The extract is provided below for ease of reference:</p> <p>“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). The site has not been allocated for residential purposes due to the absence of supporting information covering key issues such as highway constraints, ecological constraints in addition to topography and landscape issues etc. Given the lack of detail at this stage on the proposed use of the site, it is difficult to assess the site in the context of a possible land use allocation. Therefore, no specific allocation is proposed in the Deposit Plan.”</p> <p>The proposal to allocate Pen-y-Castell Farm, Kenfig Hill is not supported.</p>
---	---	---

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.

221	<p><b>Land at Zig Zag Lane, Porthcawl (ref: 221.C2)</b></p> <p>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'.</p> <p><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).</p> <p>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 promptly supply a mix of much needed market and affordable homes to Porthcawl.</p>	<p>Allocate Land at Zig Zag Lane, Porthcawl (candidate site ref: 221.C2)</p>	<p>No action is considered necessary. As stated in the Candidate Site Assessment, "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".</p> <p>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.</p>
-----	---	--	--

**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 are 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 lies c. 1.6 km to the south west and therefore is commutable by bus or cycle.

Environmental Considerations

- Ecology - There are no statutory or non-statutory 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, a 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



<p>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.</p> <ul style="list-style-type: none"> <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> <p><u>Manor Farm Fields – Proposed SINC Designation</u></p> <p>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</p>	<p>Object to the ‘proposed’ SINC designation for Manor Farm Fields, Porthcawl</p>	<p>As stated within proposed development management policy DNP5, development within or adjacent to a SINC must be compatible with the nature conservation or scientific interest of the area, whilst promoting their educational role. Developments which would have an adverse impact on these sites will not be permitted unless the benefits associated with the development can be demonstrated to outweigh the harm and/or the harm can be reduced or removed by appropriate mitigation and/or compensation measures.</p> <p>Contrary to the representor’s statement, Manor Farm Fields is an existing SINC designation. Whilst the Deposit Plan did identify all existing SINC designations on the Proposals Map, this approach was inconsistent with the existing adopted LDP. Due to the frequency at which these local designations are reviewed, and also the protection afforded by proposed criteria-based policy DNP5, it is not considered appropriate to identify SINC on the Proposals Map itself and these designations will be removed. This will ensure help ‘future proof’ the Replacement LDP as and when any SINC designations are changed.</p>
---	---	---

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 SINCE 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 / fall-back 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.

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.

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.

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

	<p>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 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. See attached overarching representations (dated 27th July 2021) and candidate site specific representations (for Zig Zag Lane, Porthcawl ref: 221 C2) (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 is not appropriate) and Test 3 (that the Deposit Plan is unlikely to deliver in the relevant timescales and allow for appropriate contingency provisions).</p>		<p>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.</p>
38	Support	None	Comments noted.
394	Support	None	Comments noted.
345	<p><b><u>Land to the North &amp; East of Cypress Gardens, Newton, Porthcawl, CF36 5BZ (Site Reference: 345.C1)</u></b></p> <p>We are writing to you on behalf of our client, Tythegston Millennium Trust, in respect of the current consultation exercise being carried out by Bridgend County Borough Council (BCBC) on the Replacement Bridgend Deposit Local Development Plan (2018 – 2033). Accordingly, this representation is made in respect of the vacant scrubland located to the north and east of Cypress Gardens in Newton. The extent of the site is shown on the site location plan (enclosed at Appendix I). This same site was promoted for residential purposes as part of the call of candidate sites consultation exercise that was carried</p>	<p>Allocate or extend the settlement boundary to include Land to the North &amp; East of Cypress Gardens, Newton, Porthcawl (Candidate Site: 345.C1) as the site represents a logical and proportionate 'minor' extension to this key settlement</p>	<p>No action is considered necessary. 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 to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables sustainable growth is proposed to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pencoed and with the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly'.</p> <p>As detailed within the Spatial Options Background Paper, the Spatial Strategy seeks to continue to provide a land use framework that helps realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033. 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. Regeneration Growth Areas appear before Sustainable Growth Areas within SP1 to clearly highlight a necessary degree of continuity with the first adopted LDP. The undeveloped brownfield regeneration allocations identified in the existing LDP are proposed to be retained and supplemented with sustainable urban growth in settlements that demonstrate strong</p>

<p>out by BCBC in November 2018 to inform the preparation of the Replacement Bridgend Local Development Plan. The site was given reference number 345.C1.</p> <p><u>Site Context</u> The subject site extends to approximately 1.36 hectares and is situated to the north and east of Cypress Gardens, which is located in Newton, on the eastern side of Porthcawl. The site comprises unused land that is well suited for residential development, immediately bounding Cypress Gardens to the south and a public right of way to the north, beyond which is a belt of vegetation and tree cover that screens the properties fronting Lime Tree Way. To the east is open land that extends along the coastline towards Candleston Castle. The surrounding area is predominantly residential in character and form, largely consisting of detached dwellings benefitting from front and rear gardens, with respective driveways accessed from cul-de-sacs served by the main estate roads.</p> <p>The site is surrounded on three sides by the settlement boundary and within close proximity to Porthcawl, which is defined by the adopted Local Development Plan as a Strategic Regeneration Growth Area (SRGA). It is not within open countryside and is close to an established settlement; being on the urban fringe, opposite existing and proposed dwellings, served by existing infrastructure associated with the surrounding housing development and can be integrated easily into the neighbouring built-up area.</p> <p><u>Summary of Candidate Site Representation</u> The representation prepared for this site and submitted at the candidate sites stage was accompanied by details of the site, its planning history, an indicative site layout plan, an Ecological Appraisal and the rationale for including the site as a residential allocation. This information was presented in a statement (dated 8th</p>		<p>employment, service and transportation functions. This approach is essential to implement the long term regeneration strategy embodied within the Replacement LDP Vision.</p> <p>Porthcawl is specifically identified as a Regeneration Growth Area (as defined by SP1) as it demonstrates capacity to accommodate growth in a sustainable manner, primarily via the significant brownfield redevelopment opportunity within it's environ. The Growth Area demonstrates high potential to attract regeneration-based inward investment that will address a broad range of socio-economic issues and complement community-based regeneration initiatives.</p> <p>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. 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.</p> <p>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.</p> <p>In relation to Land to the North and East of Cypress Gardens, Newton, Porthcawl the Candidate Site Assessment clearly states,</p> <p>“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.”</p> <p>Notwithstanding the representor's comments, the proposal to allocate Land to the North and East of Cypress Gardens, Newton, 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.</p>
--	--	--

<p>November 2018). To avoid repetition, we will not reiterate the content of our previous representation in this letter report and, instead, include a copy of the representation at Appendix II. However, to summarise, the subject site represents 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. In addition, the site has excellent accessibility to a variety of transport modes and there are plentiful key services in the immediate vicinity. A planning application (LPA Reference 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:</p> <ul style="list-style-type: none"> <li>• Topographical Site Survey</li> <li>• Utilities Survey</li> <li>• Preliminary Ecological Appraisal</li> <li>• Landscape Character Visual Impact Assessment</li> <li>• Tree Constraints Plan</li> <li>• Landscape Strategy</li> <li>• Heritage Impact Assessment</li> <li>• Phase 1 Ground Conditions Desk Study</li> <li>• Pre-Development Tree Survey &amp; Assessment</li> <li>• Concept Drainage Layout</li> <li>• Illustrative Site Layout Plan &amp; Parameters Plan</li> <li>• Site access general arrangement and vertical alignment design (including swept path analysis)</li> </ul>		<p>A Settlement Boundary Review (2021) was also published alongside the Deposit Plan consultation documents. This study provides the background and justification for the review of the settlement development boundaries through the Replacement Local Development Plan (2018-2033). It includes a list of matters that have been considered when determining if and how an existing settlement boundary should be changed. It also includes maps and tables for the County Borough of Bridgend illustrating the proposed changes and explaining the reasons for them. This Study did not propose any changes to the existing settlement boundary of Porthcawl. As detailed within the Review,</p> <p>“Porthcawl is defined as an area of growth – but which can predominantly be served within the existing settlement boundary. A more flexible approach to defining settlement boundaries around these settlements would mean the inclusion of greenfield sites that could be ‘cherry-picked’ by developers and undermine the delivery of key regeneration sites within the settlements that are crucial for the success of the Plan”.</p> <p>As such, the representor’s proposal to extend the Porthcawl settlement boundary to include Land to the North and East of Cypress Gardens, Newton, Porthcawl, is not supported.</p>
---	--	--

- Transport Statement
- Travel Plan The outline planning application remains under consideration by the council.

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).

"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 North 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 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 sites 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

<p>developed. The site also has excellent accessibility to a variety of transport modes and there are plentiful key services in the immediate vicinity.</p> <p>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:</p> <ul style="list-style-type: none"><li>• 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.</li><li>• 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 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.</li><li>• 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</li></ul>		
--	--	--

<p>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.</p> <ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li><li>• 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</li></ul>		
--	--	--

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

	<p>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.</p> <p>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.</p>		
425	<p>SP2 (1) Porthcawl Waterfront Porthcawl Waterfront Growth Area is proposed for the allocation of 1,115 homes under Policy PLA1. The site comprises an existing LDP 'rollover' site proposed for re-allocation. Relying on the delivery of the site which comprises a large element of the proposed housing site puts at risk the ability of the plan to deliver and prejudices achieving the development plan housing requirement, as has been seen by the existing LDP. The LDP Preferred Strategy consultation report stated that:</p> <p>"...paragraph 6.3 of the Background Paper [4: Housing] 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" The Welsh Government's Development Plans Manual (DPM) places an increased emphasis on deliverability and the Council (and Inspector examining the Plan) will need to have a high degree of confidence that each allocated site has a realistic prospect of being delivered in line with the housing trajectory set out within the RLDP. Whilst 'deliverability' was referenced four times in the second edition of the DPM, the latest (Edition 3) DPM includes the reference to 'deliverability' 20 times. The latest edition (Edition 3) of the Development Plans Manual states: "The key objective an LPA should establish is whether a site promoter has a serious intention to develop</p>	<p>Objection SP2(1): overreliance of the Porthcawl Waterfront Site to deliver the plans housing requirement.</p>	<p>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.</p> <p>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 Porthcawl Waterfront's trajectory is both unsubstantiated and not supported.</p>

<p>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, as set out in their report to Cabinet on 20th July:</p> <p><i>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)"</i></p> <p>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.</p> <p>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</p>		
---	--	--

	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.		
--	---	--	--

Title: Do you have any comments to make on the key proposals? Ogmore and Garw valleys			
ID	Comment	Summary of changes being sought/proposed	Council response
82	No comments	No changes proposed	Comments noted.
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	<p>Comments noted. It is beyond the scope of the LDP to reintroduce a railway to Bridgend.</p> <p>The Ogmore and Garw Valleys are identified as Local Settlements. Therefore, whilst these areas will not be earmarked to accommodate significant growth, the Replacement LDP seeks to create sustainable communities linked to wider opportunities in a manner that protects their high quality environment. It is recognised that alternative forms of development would help deliver smaller-scale 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.</p> <p>An Urban Capacity Study (UCS) (See Appendix 39) has been prepared of which provides analysis of the potential urban capacity of the County Borough's settlements for housing to evidence the expected small and windfall site allowance rate. The UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate such housing. It serves as a useful resource to developers who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP.</p>
707	Don't know the area	No changes proposed	Comments noted.
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 determine whether they conformed with the Preferred Strategy and, if so, whether they were deliverable. Sites measuring less than 0.25 hectares (including 329.C1) are too small for individual allocation and were therefore assessed through the Settlement Boundary Review (See Appendix 38). The Council has reviewed all settlement boundaries within the County Borough to determine if they are still appropriate in light of the Replacement LDP Strategy and / or would constitute appropriate amendments to existing boundaries. This included candidate site 329.C1 (rear of Osborne Terrace, Nantymoel). As detailed within the Review, the Replacement LDP Strategy does not identify Nantymoel as a location for strategic growth. Candidate site 329.C1 was considered to represent an inappropriate extension to the existing settlement of Nantymoel into the open countryside. Therefore, following the Review, the Deposit Replacement LDP has not proposed altering the defined settlement boundary of Nantymoel to include this site.
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	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? Bridgend and Pencoed			
ID	Comment	Summary of changes being sought/proposed	Council response
82	<p>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</p>	De-allocate Land West of Bridgend	As documented in the Candidate Site Assessment, the Land West of Bridgend 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 such, the proposal to remove Land West of Bridgend from the Deposit Plan is not supported.



<p>where they would be vulnerable to coalescence. For this reason, this site is not considered appropriate for the scale of development proposed.</p> <p>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.</p>	<p>Change to housing trajectory for Parc Afon Ewenni, Bridgend</p>	<p>In terms of Parc Afon Ewenni, 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.</p> <p>Nevertheless, 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.</p>
<p>Land East of Pencoed – This site is located to the north of Junction 35 of the M4. There</p>	<p>Change to housing trajectory</p>	<p>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</p>

	<p>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.</p>	<p>for Land East of Pencoed</p>	<p>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 such, the proposal to delay the site housing trajectory is not supported.</p>
<p>1366</p>	<p><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</p>	<p>No changes proposed. Continue to support the allocation of Land West of Bridgend for progression within the Replacement LDP.</p>	<p>Comments noted.  All allocations have been proposed based on the outcome of the Candidate Site Assessment, their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All new proposed allocations are considered to demonstrate delivery in accordance with the requirements set out in the Development Plans Manual. All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access 10 requirements, design parameters, s106 requirements, infrastructure and costs. This process provides a high degree of confidence that the sites included within the Deposit Plan are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.</p>

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.

<p>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.</p> <p>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.</p> <p>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.</p>		
---	--	--

*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.

*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 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'.

*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

<p>infrastructure, including green streets and amenity green space.</p> <p>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 it is 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.</p> <p><i>Conclusion</i></p> <p>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 stand by 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.</p> <p><b>Land South of Bridgend (Island Farm)</b></p> <p>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</p>	<p>Change to housing trajectory for Land South of Bridgend (Island Farm)</p>	<p>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</p>
--	--	--

<p>Heronsbridge Special Educational Needs School in addition to providing up to 850 homes.</p> <p>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.</p> <p>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.</p> <p><b>Land East of Pencoed</b></p>	<p>Change to housing trajectory</p>	<p>Meeting. As such, the proposed change to Land South of Bridgend (Island Farm) trajectory is both unsubstantiated and not supported.</p> <p>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</p>
--	-------------------------------------	---

	<p>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.</p> <p>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.</p> <p>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.</p>	<p>for Land East of Pencoed</p>	<p>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.</p>
717	<p>Agree with development overall. Concerned about the number of houses already built and continuing to be built and that the</p>	<p>Support with development overall.</p>	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan,</p>

<p>transport strategy will not support this. Very supportive of more community leisure facilities and protecting Bridgend 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</p>	<p>Concerns regarding the level of housing proposed, particularly relating to transport</p>	<p>underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned by 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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan.</p> <p>The proposed allocation of PLA2 Land South of Bridgend (Island Farm) is supported by Transport Assessment has now been updated to reflect the final number of dwellings the site is expected to deliver. This identifies the various transport issues relating to the proposed development, and, in combination with the Strategic Transport Assessment, what measures will be taken to deal with the anticipated transport impacts of the scheme. Proposed Policy PLA2 prescribes the appropriate development requirements in relation to all forms of travel. For the avoidance of any doubt, this number of dwellings does not require the original proposed site boundary to be expanded, rather more efficient use of the existing net developable area. The density and mix of uses proposed is considered appropriate to support a diverse community and vibrant public realm, whilst generating a critical</p>
---	---	---

		<p>mass of people to support services such as public transport, local shops and schools. In accordance with national planning policy, higher densities should be encouraged in urban centres and near major public transport nodes or interchanges. Given the site's location within the Primary Key Settlement of the County Borough and the proximity to Bridgend Town Centre, this density level is therefore considered appropriate to foster sustainable communities, further bolstered by the proposed enhancements to the active travel network.</p> <p>The Replacement LDP aims to reduce private car reliance and help the County Borough achieve the principles set out by the Active Travel (Wales) Act 2013, with the ultimate aim of improving and expanding upon the current active travel routes as identified in the Existing Route Maps. Consideration of active travel has been key during the master planning of strategic sites in the County Borough. Reference to the Active Routes detailed in Policy PLA2 in conjunction with Policy PLA12 should be considered essential in the delivery of any strategic site or any proposal, ensuring that development is contributing to the promotion of a sustainable and healthy lifestyle.</p> <p>The Active Travel Network Maps aim to improve access to key services and facilities including town centres, employment sites, retail areas and transport hubs, improved access to education facilities such as schools and colleges and improvements to, and expansion of, the existing strategic cycle network in the County Borough. Opportunities will be maximised to further improve upon these routes, providing walking connections which will allow integration between new developments and existing communities.</p> <p>Whilst developments should be encouraged in locations which reduce the need to travel and promote the use of sustainable transport, the Council recognises that any development growth will likely result in greater travel demand, and that increased traffic levels and congestion is likely to occur if appropriate mitigating transport measures and infrastructure are not delivered. Therefore a Strategic Transport Assessment (See Appendix 36) has been undertaken to consider the impact of plan proposals and help guide and inform the process of delivering land allocations by means of modelling and quantifying the transport impact of these proposals. The technical notes accompanying this assessment demonstrate that the proposed level of development detailed within the LDP can be accommodated within the BCBC Highway Network with suitable mitigation.</p> <p>Furthermore Strategic Policy 5: Sustainable Transport and Accessibility will ensure that development must be located and designed in a way that minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, education, local services and community facilities. Development will be required to deliver, or contribute towards the provision of, active travel scheme, public transport measures, road infrastructure, and other transport measures, in accordance with the Bridgend Local Transport Plan and the Bridgend Integrated Network Plan (See Appendix 29).</p> <p>Proposed Policy PLA2 prescribes a number of placemaking principles for Land South of Bridgend (Island Farm), which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. Such requirements include pursuing 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. There will be a clear emphasis on providing safe pedestrian and cycling linkages between the site, the Town Centre and surrounding environs. In addition proposed Policy PLA2 will require the site's green infrastructure network to extend to Newbridge Fields, thereby 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.</p> <p>The site promoter's Transport Assessment has identified that with exception of the A48 proposed site access junction, and the Ewenny Road Roundabout in the AM peak hour, and the B4265 / Ewenny Road junction in</p>
--	--	--

		<p>both peak hours, the revised Island Farm proposals will result in lower traffic flows through all junctions across the assessment network over both the AM and PM peak hour periods, compared to the previous consented development proposals on the Island Farm Site. As the consented flows are technically already considered to be existing on the highway network, this revised scheme will provide traffic reduction improvements across the local highway network. Previous assessment work on the Island Farm site has identified that the Broadlands Roundabout, Ewenny Roundabout, and Picton Close Junction all show capacity issues in forecast year assessment scenarios both including and excluding the consented Island Farm proposals traffic. Although the revised Island Farm proposals in general bring traffic reductions across these junctions (from what was previously consented), with consideration of background traffic growth alone, these junctions will still likely require mitigation to operate within capacity during future forecast years. The reduction in flows as a result of the revised Island Farm proposals however, may mean that any mitigation measures implemented can potentially achieve greater capacity improvements at each junction. The revised proposals at the Island Farm site include three separate vehicle access points onto the local highway network (compared to just two within the consented scheme). All three site access junctions are expected to operate within capacity under the revised Island Farm proposals. An updated assessment at all three identified junctions, and the site access junctions will be undertaken as part of a future supporting Transport Assessment for the revised Island Farm development, which will ideally include up to date baseline traffic flows as the basis for the assessment (Covid restrictions allowing).</p> <p>Reference to the proposed road dualling of the A48 has been removed from the Replacement LDP, with intentions focussed on capacity enhancements between Waterton and Laleston, A48/A473, Bridgend.</p> <p>In terms of wildlife, the Strategy acknowledges that the County Borough has a rich and varied biodiversity with a broad range of species, habitats and unique, rich landscapes. Policies within the Deposit Plan have been refreshed and updated from the existing LDP and will continue to protect the county borough's environment in line with national planning policy and the Environment Act 2016. These policies cover development in the countryside, special landscape areas, local / regional nature conservation sites, trees, hedgerows and development, green infrastructure, nature conservation and natural resources protection and public health. For development to be sustainable, it needs to be soundly based on good environmental assessments, and to be well planned and controlled with regard to its environmental impact, in order to conserve and enhance biodiversity.</p> <p>There is clear guidance and legislation with regard to the protection of species and habitats recognised in legislation, Planning Policy Wales (PPW) and TAN5 Nature Conservation and Planning. The most relevant statutory requirements are set out in Section 61 of the Planning and Compulsory Purchase Act 2004, the Conservation of Habitats and Species Regulations 2017, Environment (Wales) Act 2016 Section 6 Biodiversity and Resilience of Ecosystems Duty and Section 7 Priority Habitats and Species, Section 11 of the Countryside Act 1981 and Section 28G of the Wildlife and Countryside Act 1981. Annex 1 of TAN5 lists all the other relevant legislation.</p> <p>To comply with the Environment (Wales) Act 2016 (Section 6 Duty) the LDP Strategy will seek to enhance the biodiversity and resilience of the County Borough's ecosystems through native species landscaping, careful location of development, the creation of green corridors, and open space management. It is important that biodiversity and resilience considerations are taken into account at an early stage in both development plan preparation and when proposing or considering development proposals. All reasonable steps must be taken to maintain and enhance biodiversity and promote the resilience of ecosystems and these should be balanced with the wider social needs of local communities. Only in exceptional circumstances, where it is in the public interest, will new development be located where it may have an adverse impact on sites designated for their importance for nature conservation. Robust mitigation and compensation will be provided wherever this situation is unavoidable, in line with considered advice from statutory and advisory organisations.</p>
--	--	--



			<p>The Environment Act (Section 6) sets out a framework for planning authorities to maintain and enhance biodiversity to provide a net benefit for biodiversity through a proactive and resilient approach. Policies SP17 and DNP6 of the LDP set the framework to deliver on this premise, as set out in Policy 9 (NDF). Policy DNP6 (LDP) will be revised to ensure it is based on a net benefit approach to achieve these outcomes.</p> <p>It is acknowledged that Strategic Allocation PLA2: Land South of Bridgend (Island Farm) contains a Site of Importance for Nature Conservation (SINC) (The Island Farm POW Camp) of which covers 14.03 hectares of land within the allocated site. PPW identifies SINC's as local non-statutory protected sites. Paragraph 6.4.20 states that 'Although non-statutory designations carry less weight than statutory designations, they can make a vital contribution to delivering an ecological network for biodiversity and resilient ecosystems, and they should be given adequate protection in development plans and the development management process.'</p> <p><b>Existing Consent</b></p> <p>In relation to Strategic Allocation PLA2: Land South of Bridgend (Island Farm), development has already lawfully commenced on this site. The Island Farm mixed use development comprising sport/leisure/commercial and office uses was granted Outline planning permission on 14<sup>th</sup> March 2012 (P/08/1114/OUT). The permission was subject to a Section 106 Legal Agreement (Legal File Refr: E40-275) that controlled highway works, land dedication, management plans, contributions and matters relating to travel and management plans associated with the stadia development. A series of reserved matters consents were granted for an indoor tennis centre, (P/14/354/RES refers), landscaping and ecological works, (P/14/823/RES refers), and highway and drainage infrastructure (P/14/824/RES refers). The Outline permission included the standard time limit conditions for the submission of reserved matters and the commencement of development. The final approval of reserved matters was issued on 12<sup>th</sup> June 2015.</p> <p>The Outline planning permission included approval for the construction of a new traffic light controlled junction on the A48 that would serve as the primary access to the development site. The road construction would however pass through an area of local ecological value – the Island Farm Prisoner of War Camp Site of Importance for Nature Conservation (SINC). Under the Conservation and Habitats and Species Regulation 2010, a conditional European Protected Species Licence was issued. In order to comply with the licence and to prevent the new access road from fragmenting the dormice population, the developer proposed to construct and plant the approved 'Green Bridge'. However, access to the site could not be formed from the A48 until the Green Bridge had been established. Under a non-material amendment to the outline planning permission and application P/17/29/FUL, the Council consented a temporary construction access from Ewenny Road/New Inn Road to allow a sequence of 'enabling works' that had been approved under P/14/354/RES and P/14/824/RES. These 'enabling works' are described as:</p> <ul style="list-style-type: none"><li>• The setting up of the site facilities via Island Farm Lane and New Inn Road to provide the site facilities and temporary internal roads for the delivery of earth moving plant to the site;</li><li>• Undertaking earthworks to form a plateau for the Tennis Centre;</li><li>• Undertaking the earthworks, drainage works and form the sub base to the internal access road working from the boundary adjacent to the interconnecting spur with the adjacent Technology Drive;</li><li>• Break through the boundary hedgerow and construct the proposed road link between the Island Farm site access road and Technology Drive. Install the incoming services infrastructure that will access the site via Island Farm Lane. Construction access herein to be via Technology Drive;</li></ul> <p>The aforementioned works were commenced in July 2017 in accordance with the above consents and the details agreed in relation to the pre-commencement planning conditions. Under the definitions within the planning obligation, the aforementioned works constituted a 'commencement of development' triggering a number of obligations in relation to highway works. A deed of variation to the original agreement was signed on 11<sup>th</sup> October</p>
--	--	--	--

		<p>2018 which reconciled the enabling works (phase 0) with the original obligation. On the basis of the above, the 'enabling works' constituted a material operation and a lawful commencement of reserved matters consents P/14/354/RES and P/14/824/RES. The works have not been completed but the Council's opinion is that the permissions are extant.</p> <p>Notwithstanding the extant planning permission, based on the revised mix of uses now proposed on the site, there is considered to be an overriding need for the development. Re-allocation of this site will enable accommodation of sustainable growth enshrined in placemaking principles, deliver affordable housing in the highest need part of the County Borough and enable delivery of two schools on the site, including relocation of Heronsbridge Special School. It will also enrich active travel and green infrastructure networks within Bridgend through creation of a 'green lung' that will connect the site to the Town Centre via Newbridge Fields. Development of this edge of settlement site would accord with the Preferred Strategy, channel growth to the Primary Key Settlement of the County Borough and make a significant contribution to the housing need identified in the LHMA. The site promoter has also provided extensive supporting information to evidence the site is both viable and deliverable.</p> <p>Proposed Policy PLA2 prescribes a number of placemaking principles for Land South of Bridgend (Island Farm), which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. A final 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. This will need to demonstrate how the development will 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. An illustrative masterplan will also be included in the final version of the Replacement LDP to enable all parties to understand how the site will be developed in broad terms, including proposed land uses, access, infrastructure requirements, constraints and areas of protection. This masterplan will clearly identify the location of the SINC in the context of the wider allocation.</p> <p><b>Ecological mitigation measures already implemented</b></p> <p>As part of the existing consent, a mitigation strategy was produced in 2009 to offset the impacts of the development. It was proposed that the SINC and south west field would become a wildlife conservation area within the new development. Surveys at the site found dormice <i>Muscardinus avellanarius</i> to be present, both within the woodland and scrub in the SINC and in the hedgerows of the agricultural fields. These areas are also known to be used by bats for foraging and commuting purposes, and the SINC area contains a roost site for lesser horseshoe bats <i>Rhinolophus hipposideros</i> and brown long-eared bats <i>Plecotus auritis</i>.</p> <p>As part of the development process some areas of these habitats were to be lost, and modification to the remaining areas due to the impacts of the development, including noise and light spillage. Part of the mitigation strategy to counter these losses included the creation of new habitats suitable for the relevant species. As such, habitat design was guided by the requirements of the protected species of which had the potential to utilise the site. In addition to dormice and bats, a further condition of the existing consent required the habitat requirements of Great Crested Newts <i>Triturus cristatus</i> to be taking into account.</p> <p>The habitat design for the consented scheme included:</p> <ul style="list-style-type: none"> <li>• <b>Tree and Scrub Planting:</b> translocation and planting new trees and scrub in the south-west field, providing an alternative for displaced animals, including dormice, bats, and shelter for reptiles and amphibians.</li> <li>• <b>Hedgerow Enhancement:</b> enhancement and translocation of hedgerows from the centre of the site to the eastern site boundary has been undertaken, to create continuous hedge lines which help to buffer the</li> </ul>
--	--	---

			<p>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.</p> <ul style="list-style-type: none"> <li>• <b>Bat Roosting Building:</b> 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>• <b>Dormouse Nest Boxes:</b> 35 dormouse nest 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>• <b>Pond creation:</b> two new ponds have been created within the south-west field, with the primary aim of providing habitat for Great Crested Newts.</li> <li>• <b>Grassland Creation:</b> rough grassland created around the pond to mitigate loss of existing grassland.</li> </ul> <p><b>Proposed mitigation</b></p> <p>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:</p> <ul style="list-style-type: none"> <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</li> <li>• To identify any key ecological constraints and make recommendations for design options to avoid significant effects on important ecological features/ resources.</li> </ul> <p><b>General habitat – Existing</b></p> <p>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.</p> <p>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.</p> <p>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 within the SINC identified on site. Detailed surveys will be undertaken to consider the botanical diversity of this area.</p> <p>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.</p> <p>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.</p>
--	--	--	---

		<p>A number of sink holes were noted across the site. These ranged from those which had apparently been present for a long period of time and had mature trees growing within them, to those very recently emerging and just comprising of small areas of collapsed earth.</p> <p>Natural Resources Wales (NRW) states that consideration will need to be given to protected species (Hazel Dormice, Lesser Horseshoe Bats, Brown Long Eared Bat records on site). Furthermore, NRW states that consideration will need to be given to impacts on the SINC, and habitat – ancient mature hedgerows and woodland.</p> <p>As such the ecological appraisal also considered the following species:</p> <p><u>Dormouse</u> The site contains hedgerows and woodland of which were assessed to hold high value for dormice. The previous surveys identified the presence of dormice within the SINC located in the north of the site. It was therefore assessed that further surveys would be required to update the status of the site for this species and to inform detailed proposals for the site.</p> <p><u>Riparian mammals</u> The River Ogmore was present along the eastern edge of the Craig-Y-Parcau, with records of both otter and water vole found south of the site. However, the previous surveys identified no evidence of riparian mammals within the development area. Considering the presence of previous records in the area and suitable habitat directly adjacent to the site, it is recommended surveys are undertaken for these protected species and to inform detailed proposals for the site.</p> <p><u>Great crested newt</u> The previous surveys assessed the ponds to be unsuitable for great crested newt (GCN) and that GCN were absent from the site. Since then, it is understood that the previously surveyed ponds have been removed and new wildlife ponds created in the south-west of the main site area. The two water bodies identified during the walkover had relatively low water levels and limited aquatic vegetation. The current proposals indicate the retention and protection of the ponds. Nevertheless, they could provide suitable breeding habitat for amphibians and it is recommended that a Habitat Suitability Index of each of the ponds within 500m of the development site to inform detailed planning application.</p> <p><u>Birds</u> There was a mix of permanent pasture and arable land providing suitable habitat for farmland birds. Also, the hedgerows and their margins within the fields was assessed to provide potential habitat for ground nesting birds. The woodland, hedgerows, scrub and scattered trees were assessed to have high potential for breeding birds. Evidence of barn owl was found in a stable in the south-east of the site. Further surveys for breeding birds have been recommended within section 5 to inform detailed proposals for the site.</p> <p><u>Bats</u> The previous surveys identified roosting lesser horseshoe and brown long-eared bats within Hut 9 in the woodland in the SINC. Since the previous surveys were undertaken, a dedicated bat roost has been created in the south-west of the main site. Additionally, the built structures within the Craig-Y-Parcau area were in extremely poor structural condition and a wide range of bat roosting features were visible for the external walkover. They were assessed to hold high potential for roosting bats. Therefore, it was assessed that an updated assessment of the structures should be undertaken to assess their status for roosting bats. Additionally, emergence/re-entry surveys are recommended. The habitats within both sites contained woodland and hedgerows, offering potential commuting, foraging and roosting habitats for bats may provide potential commuting and foraging habitats for bats. A number of mature trees were also noted which could have potential roosting features for bats.</p> <p><u>Badgers</u> The habitats on site were comprised of woodland, grassland and arable land which have potential to support badgers. However, it should be noted that the previous survey identified badgers to be absent from the site.</p> <p><u>Reptiles</u></p>
--	--	---

			<p>Much of the site was comprised of arable land and agriculturally intensified grassland providing negligible potential for reptiles. The key features were assessed to be the sections of grassland and scrub located at the woodland edges. The site was comprised of common and widespread habitats providing low potential habitats for invertebrates. No detailed surveys will be required.</p> <p><u>SINC Review</u> A SINC review undertaken by the Wildlife Trust indicates that the on-site SINC does not appear to have changed significantly since 2011's survey and therefore still qualifies as a SINC. The small section of woodland in the field to the south-east is worth removing from the citation as it is isolated and does not appear to add to the site's value. The woodland varies in quality but appears to offer habitat for dormice and bats and there are numerous woodland indicator species. The grassland is not particularly species-rich but adds to the site as a whole. The site suffers from antisocial behaviour including fly-tipping, frequent drug use and signs of semi-permanent habitation that is detrimental to the biodiversity of the site.</p> <p>The review recommended that dormouse tubes are replaced and monitored and that antisocial activities are reduced where feasible. Although the grassland areas are not very diverse they add to the diversity of the site and some scrub control to stop their loss is recommended though not a priority.</p> <p><b>Overall</b> PPW identifies SINC's as local non-statutory protected sites of which carry less weight than statutory designations, however it is acknowledged that they can make a vital contribution to delivering an ecological network for biodiversity and resilient ecosystems, and they should be given adequate protection. As such, the Masterplan relating to allocation PLA2: Land South of Bridgend (Island Farm) has included a number of measures to address previously identified ecological constraints including the retention of the majority of the SINC and protection of the artificial bat roost and hedgerows. Furthermore, the masterplan for Island Farm has indicated the retention of SINC land within the site boundary, with the exception of the access road from the A48. Areas of ecological value are proposed for retention including existing sink holes; which offer value for a range of invertebrates, and an ecological enhancement area located in the south-western field; previously enhanced for ecology in relation to the 2008 sports village application. The masterplan also indicates retention of continuous green areas to ensure a continued network of green and blue infrastructure.</p> <p>Further work and surveys are to be undertaken from an ecological perspective in line with the recommendations of the ecological report. However, there were no 'show-stoppers' found at this stage, with appropriate mitigation measures available to ensure that the development of the site is acceptable and any related impacts can be minimised.</p> <p>NRW support the commitment for the future development of the site to follow a Green Infrastructure led approach so that the mixture of uses will be fully integrated and designed around the SINC.</p> <p>Overall, the site has an extensive planning history which has demonstrated that the site can be developed in an ecologically sensitive way through careful scheme design and the use of mitigation measures. Policy PLA2 will ensure that the proposed uses through outlined development requirements are fully integrated into the future development of site.</p>
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 Bridgend County Borough's own local planning guidance, that seeks to ensure that only	Concerns relating to Strategic Allocation PLA2: Land South of Bridgend (Island Farm) and Housing	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned by 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</p>

<p>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.</p>	<p>Allocation COM1(2): Craig y Parcau</p>	<p>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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan. As such, candidate sites PS.1 Island Farm &amp; PS.2 Craig y Parcau were considered appropriate for allocation.</p> <p>As part of the proposed allocation of Land South of Bridgend (Island Farm), development will be subject to site-specific requirements including masterplan development principles and placemaking principles (See Deposit Policy PLA2 – Page 67). The provision of new residential units, including affordable dwellings, will be incorporated alongside a new one 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.</p> <p>In terms of wildlife and biodiversity, the Strategy acknowledges that the County Borough has a rich and varied biodiversity with a broad range of species, habitats and unique, rich landscapes. Policies within the Deposit Plan have been refreshed and updated from the existing LDP and will continue to protect the county borough’s environment in line with national planning policy and the Environment Act 2016. These policies cover development in the countryside, special landscape areas, local / regional nature conservation sites, trees,</p>
--	---	---

		<p>hedgerows and development, green infrastructure, nature conservation and natural resources protection and public health. For development to be sustainable, it needs to be soundly based on good environmental assessments, and to be well planned and controlled with regard to its environmental impact, in order to conserve and enhance biodiversity.</p> <p>There is clear guidance and legislation with regard to the protection of species and habitats recognised in legislation, Planning Policy Wales (PPW) and TAN5 Nature Conservation and Planning. The most relevant statutory requirements are set out in Section 61 of the Planning and Compulsory Purchase Act 2004, the Conservation of Habitats and Species Regulations 2017, Environment (Wales) Act 2016 Section 6 Biodiversity and Resilience of Ecosystems Duty and Section 7 Priority Habitats and Species, Section 11 of the Countryside Act 1981 and Section 28G of the Wildlife and Countryside Act 1981. Annex 1 of TAN5 lists all the other relevant legislation.</p> <p>To comply with the Environment (Wales) Act 2016 (Section 6 Duty) the LDP Strategy will seek to enhance the biodiversity and resilience of the County Borough's ecosystems through native species landscaping, careful location of development, the creation of green corridors, and open space management. It is important that biodiversity and resilience considerations are taken into account at an early stage in both development plan preparation and when proposing or considering development proposals. All reasonable steps must be taken to maintain and enhance biodiversity and promote the resilience of ecosystems and these should be balanced with the wider social needs of local communities. Only in exceptional circumstances, where it is in the public interest, will new development be located where it may have an adverse impact on sites designated for their importance for nature conservation. Robust mitigation and compensation will be provided wherever this situation is unavoidable, in line with considered advice from statutory and advisory organisations.</p> <p>The Environment Act (Section 6) sets out a framework for planning authorities to maintain and enhance biodiversity to provide a net benefit for biodiversity through a proactive and resilient approach. Policies SP17 and DNP6 of the LDP set the framework to deliver on this premise, as set out in Policy 9 (NDF). Policy DNP6 (LDP) will be revised to ensure it is based on a net benefit approach to achieve these outcomes.</p> <p>It is acknowledged that Strategic Allocation PLA2: Land South of Bridgend (Island Farm) contains a Site of Importance for Nature Conservation (SINC) (The Island Farm POW Camp) of which covers 14.03 hectares of land within the allocated site. PPW identifies SINC's as local non-statutory protected sites. Paragraph 6.4.20 states that 'Although non-statutory designations carry less weight than statutory designations, they can make a vital contribution to delivering an ecological network for biodiversity and resilient ecosystems, and they should be given adequate protection in development plans and the development management process.'</p> <p><b>Existing Consent</b></p> <p>In relation to Strategic Allocation PLA2: Land South of Bridgend (Island Farm), development has already lawfully commenced on this site. The Island Farm mixed use development comprising sport/leisure/commercial and office uses was granted Outline planning permission on 14<sup>th</sup> March 2012 (P/08/1114/OUT). The permission was subject to a Section 106 Legal Agreement (Legal File Refr: E40-275) that controlled highway works, land dedication, management plans, contributions and matters relating to travel and management plans associated with the stadia development. A series of reserved matters consents were granted for an indoor tennis centre, (P/14/354/RES refers), landscaping and ecological works, (P/14/823/RES refers), and highway and drainage infrastructure (P/14/824/RES refers). The Outline permission included the standard time limit conditions for the submission of reserved matters and the commencement of development. The final approval of reserved matters was issued on 12<sup>th</sup> June 2015.</p> <p>The Outline planning permission included approval for the construction of a new traffic light controlled junction on the A48 that would serve as the primary access to the development site. The road construction would however</p>
--	--	--

		<p>pass through an area of local ecological value – the Island Farm Prisoner of War Camp Site of Importance for Nature Conservation (SINC). Under the Conservation and Habitats and Species Regulation 2010, a conditional European Protected Species Licence was issued. In order to comply with the licence and to prevent the new access road from fragmenting the dormice population, the developer proposed to construct and plant the approved 'Green Bridge'. However, access to the site could not be formed from the A48 until the Green Bridge had been established. Under a non-material amendment to the outline planning permission and application P/17/29/FUL, the Council consented a temporary construction access from Ewenny Road/New Inn Road to allow a sequence of 'enabling works' that had been approved under P/14/354/RES and P/14/824/RES. These 'enabling works' are described as:</p> <ul style="list-style-type: none"> <li>• The setting up of the site facilities via Island Farm Lane and New Inn Road to provide the site facilities and temporary internal roads for the delivery of earth moving plant to the site;</li> <li>• Undertaking earthworks to form a plateau for the Tennis Centre;</li> <li>• Undertaking the earthworks, drainage works and form the sub base to the internal access road working from the boundary adjacent to the interconnecting spur with the adjacent Technology Drive;</li> <li>• Break through the boundary hedgerow and construct the proposed road link between the Island Farm site access road and Technology Drive. Install the incoming services infrastructure that will access the site via Island Farm Lane. Construction access herein to be via Technology Drive;</li> </ul> <p>The aforementioned works were commenced in July 2017 in accordance with the above consents and the details agreed in relation to the pre-commencement planning conditions. Under the definitions within the planning obligation, the aforementioned works constituted a 'commencement of development' triggering a number of obligations in relation to highway works. A deed of variation to the original agreement was signed on 11<sup>th</sup> October 2018 which reconciled the enabling works (phase 0) with the original obligation. On the basis of the above, the 'enabling works' constituted a material operation and a lawful commencement of reserved matters consents P/14/354/RES and P/14/824/RES. The works have not been completed but the Council's opinion is that the permissions are extant.</p> <p>Notwithstanding the extant planning permission, based on the revised mix of uses now proposed on the site, there is considered to be an overriding need for the development. Re-allocation of this site will enable accommodation of sustainable growth enshrined in placemaking principles, deliver affordable housing in the highest need part of the County Borough and enable delivery of two schools on the site, including relocation of Heronsbridge Special School. It will also enrich active travel and green infrastructure networks within Bridgend through creation of a 'green lung' that will connect the site to the Town Centre via Newbridge Fields. Development of this edge of settlement site would accord with the Preferred Strategy, channel growth to the Primary Key Settlement of the County Borough and make a significant contribution to the housing need identified in the LHMA. The site promoter has also provided extensive supporting information to evidence the site is both viable and deliverable.</p> <p>Proposed Policy PLA2 prescribes a number of placemaking principles for Land South of Bridgend (Island Farm), which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. A final 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. This will need to demonstrate how the development will 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. An illustrative masterplan will also be included in the final version of the Replacement LDP to enable all parties to understand how the site will be developed in broad terms, including proposed land uses, access, infrastructure requirements, constraints and areas of protection. This masterplan will clearly identify the location of the SINC in the context of the wider allocation.</p>
--	--	---



		<p><b>Ecological mitigation measures already implemented</b></p> <p>As part of the existing consent, a mitigation strategy was produced in 2009 to offset the impacts of the development. It was proposed that the SINC and south west field would become a wildlife conservation area within the new development. Surveys at the site found dormice <i>Muscardinus avellanarius</i> to be present, both within the woodland and scrub in the SINC and in the hedgerows of the agricultural fields. These areas are also known to be used by bats for foraging and commuting purposes, and the SINC area contains a roost site for lesser horseshoe bats <i>Rhinolophus hipposideros</i> and brown long-eared bats <i>Plecotus auritus</i>.</p> <p>As part of the development process some areas of these habitats were to be lost, and modification to the remaining areas due to the impacts of the development, including noise and light spillage. Part of the mitigation strategy to counter these losses included the creation of new habitats suitable for the relevant species. As such, habitat design was guided by the requirements of the protected species of which had the potential to utilise the site. In addition to dormice and bats, a further condition of the existing consent required the habitat requirements of Great Crested Newts <i>Triturus cristatus</i> to be taken into account.</p> <p>The habitat design for the consented scheme included:</p> <ul style="list-style-type: none"> <li>• <b>Tree and Scrub Planting:</b> translocation and planting new trees and scrub in the south-west field, providing an alternative for displaced animals, including dormice, bats, and shelter for reptiles and amphibians.</li> <li>• <b>Hedgerow Enhancement:</b> enhancement and translocation of hedgerows from the centre of the site to the eastern site boundary has been undertaken, to create continuous hedge lines which help to buffer the 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>• <b>Bat Roosting Building:</b> 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>• <b>Dormouse Nest Boxes:</b> 35 dormouse nest 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>• <b>Pond creation:</b> two new ponds have been created within the south-west field, with the primary aim of providing habitat for Great Crested Newts.</li> <li>• <b>Grassland Creation:</b> rough grassland created around the pond to mitigate loss of existing grassland.</li> </ul> <p><b>Proposed mitigation</b></p> <p>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:</p> <ul style="list-style-type: none"> <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</li> <li>• To identify any key ecological constraints and make recommendations for design options to avoid significant effects on important ecological features/ resources.</li> </ul> <p><b>General habitat – Existing</b></p> <p>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.</p>
--	--	--

		<p>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.</p> <p>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.</p> <p>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 within the SINC identified on site. Detailed surveys will be undertaken to consider the botanical diversity of this area.</p> <p>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.</p> <p>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.</p> <p>A number of sink holes were noted across the site. These ranged from those which had apparently been present for a long period of time and had mature trees growing within them, to those very recently emerging and just comprising of small areas of collapsed earth.</p> <p>Natural Resources Wales (NRW) states that consideration will need to be given to protected species (Hazel Dormice, Lesser Horseshoe Bats, Brown Long Eared Bat records on site). Furthermore, NRW states that consideration will need to be given to impacts on the SINC, and habitat – ancient mature hedgerows and woodland.</p> <p>As such the ecological appraisal also considered the following species:</p> <p><u>Dormouse</u> The site contains hedgerows and woodland of which were assessed to hold high value for dormice. The previous surveys identified the presence of dormice within the SINC located in the north of the site. It was therefore assessed that further surveys would be required to update the status of the site for this species and to inform detailed proposals for the site.</p> <p><u>Riparian mammals</u> The River Ogmore was present along the eastern edge of the Craig-Y-Parcau, with records of both otter and water vole found south of the site. However, the previous surveys identified no evidence of riparian mammals within the development area. Considering the presence of previous records in the area and suitable habitat directly adjacent to the site, it is recommended surveys are undertaken for these protected species and to inform detailed proposals for the site.</p> <p><u>Great crested newt</u> The previous surveys assessed the ponds to be unsuitable for great crested newt (GCN) and that GCN were absent from the site. Since then, it is understood that the previously surveyed ponds have been removed and</p>
--	--	---

		<p>new wildlife ponds created in the south-west of the main site area. The two water bodies identified during the walkover had relatively low water levels and limited aquatic vegetation. The current proposals indicate the retention and protection of the ponds. Nevertheless, they could provide suitable breeding habitat for amphibians and it is recommended that a Habitat Suitability Index of each of the ponds within 500m of the development site to inform detailed planning application.</p> <p><u>Birds</u> There was a mix of permanent pasture and arable land providing suitable habitat for farmland birds. Also, the hedgerows and their margins within the fields was assessed to provide potential habitat for ground nesting birds. The woodland, hedgerows, scrub and scattered trees were assessed to have high potential for breeding birds. Evidence of barn owl was found in a stable in the south-east of the site. Further surveys for breeding birds have been recommended within section 5 to inform detailed proposals for the site.</p> <p><u>Bats</u> The previous surveys identified roosting lesser horseshoe and brown long-eared bats within Hut 9 in the woodland in the SINC. Since the previous surveys were undertaken, a dedicated bat roost has been created in the south-west of the main site. Additionally, the built structures within the Craig-Y-Parcau area were in extremely poor structural condition and a wide range of bat roosting features were visible for the external walkover. They were assessed to hold high potential for roosting bats. Therefore, it was assessed that an updated assessment of the structures should be undertaken to assess their status for roosting bats. Additionally, emergence/re-entry surveys are recommended. The habitats within both sites contained woodland and hedgerows, offering potential commuting, foraging and roosting habitats for bats may provide potential commuting and foraging habitats for bats. A number of mature trees were also noted which could have potential roosting features for bats.</p> <p><u>Badgers</u> The habitats on site were comprised of woodland, grassland and arable land which have potential to support badgers. However, it should be noted that the previous survey identified badgers to be absent from the site.</p> <p><u>Reptiles</u> Much of the site was comprised of arable land and agriculturally intensified grassland providing negligible potential for reptiles. The key features were assessed to be the sections of grassland and scrub located at the woodland edges. The site was comprised of common and widespread habitats providing low potential habitats for invertebrates. No detailed surveys will be required.</p> <p><u>SINC Review</u> A SINC review undertaken by the Wildlife Trust indicates that the on-site SINC does not appear to have changed significantly since 2011's survey and therefore still qualifies as a SINC. The small section of woodland in the field to the south-east is worth removing from the citation as it is isolated and does not appear to add to the site's value. The woodland varies in quality but appears to offer habitat for dormice and bats and there are numerous woodland indicator species. The grassland is not particularly species-rich but adds to the site as a whole. The site suffers from antisocial behaviour including fly-tipping, frequent drug use and signs of semi-permanent habitation that is detrimental to the biodiversity of the site. The review recommended that dormouse tubes are replaced and monitored and that antisocial activities are reduced where feasible. Although the grassland areas are not very diverse they add to the diversity of the site and some scrub control to stop their loss is recommended though not a priority.</p> <p><b>Overall</b> PPW identifies SINC's as local non-statutory protected sites of which carry less weight than statutory designations, however it is acknowledged that they can make a vital contribution to delivering an ecological</p>
--	--	---

		<p>network for biodiversity and resilient ecosystems, and they should be given adequate protection. As such, the Masterplan relating to allocation PLA2: Land South of Bridgend (Island Farm) has included a number of measures to address previously identified ecological constraints including the retention of the majority of the SINC and protection of the artificial bat roost and hedgerows. Furthermore, the masterplan for Island Farm has indicated the retention of SINC land within the site boundary, with the exception of the access road from the A48. Areas of ecological value are proposed for retention including existing sink holes; which offer value for a range of invertebrates, and an ecological enhancement area located in the south-western field; previously enhanced for ecology in relation to the 2008 sports village application. The masterplan also indicates retention of continuous green areas to ensure a continued network of green and blue infrastructure.</p> <p>Further work and surveys are to be undertaken from an ecological perspective in line with the recommendations of the ecological report. However, there were no 'show-stoppers' found at this stage, with appropriate mitigation measures available to ensure that the development of the site is acceptable and any related impacts can be minimised.</p> <p>NRW support the commitment for the future development of the site to follow a Green Infrastructure led approach so that the mixture of uses will be fully integrated and designed around the SINC.</p> <p>Overall, the site has an extensive planning history which has demonstrated that the site can be developed in an ecologically sensitive way through careful scheme design and the use of mitigation measures. Policy PLA2 will ensure that the proposed uses through outlined development requirements are fully integrated into the future development of site.</p> <p>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).</p> <p>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.</p> <p>For Land South of Bridgend (Island Farm), the SA identified the potential for adverse impacts due to the proximity of the site to scheduled monuments and listed buildings. However, the requirements under SP2 (for each strategic site allocation to be supported by a detailed masterplan) and PLA2 (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</p>
--	--	--

		<p>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 PLA2 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. The tourism and culture asset of Hut 9 will also be preserved and enhanced through improved linkages and active opportunities.</p> <p>In relation to landscape matters, the site promoter has considered the landscape effects in addition to mitigation measures. The site is not subject to any local or national, statutory or non-statutory landscape designations, albeit there are listed buildings and TPOs on the edge of the site (neither are directly affected by the proposed development). LANDMAP analysis reflects that the sites are not subject to any designations. Whilst scoring as “high” and “outstanding” against certain criteria, it also performs as “medium” and “low” for other criteria and overall the level of sensitivity is comparable to similar parcels of land on the urban fringe of Bridgend. Further, the development of the site is not considered to undermine any of the six landscape sensitivities that are identified as typifying the Merthyr Mawr Farmland, Warren and Coastline Landscape Character Area. A detailed, updated LVIA will be required to inform and accompany further masterplanning work (as part of a future planning application). Nevertheless, Policy PLA2 will 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.</p> <p>The land surrounding Merthyr Mawr is recognised within the Replacement LDP and is very much protected by various designations and policies (see Appendix 25 – Special Landscape Designations and Appendix 26 – Landscape Character Assessment). As highlighted by Policy SP17 the historic landscape of Merthyr Mawr Warren is a National Nature Reserve. These are protected under the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way (CROW) Act 2000, the Natural Environment and Rural Communities (NERC) Act 2006 and the Environment (Wales) Act 2016. Policy SP17 specifically seeks to protect statutorily designated sites of national importance and any development proposal which affects such sites will be subject to special scrutiny to establish any potential or indirect effects. The onus will be firmly placed on any potential developer and/or owner to clearly demonstrate the case for the site’s development, and why development should not be located elsewhere on a site of less significance to nature conservation. Sensitive design in conjunction with appropriate planning conditions and/or planning obligations/agreements will be pursued by the local planning authority with a view to overcoming potential adverse impacts on the environmental resource, and to ensure protection and enhancement of a site’s nature conservation interest.</p> <p>Merthyr Mawr Warren is also designated as a Special Landscape Area (See Policy DNP4 and Appendix 25 – Special Landscape Designations), in recognition of the surrounding character and quality of the landscape. Policy DNP4 protects such designations from inappropriate development. In order to be acceptable, wherever possible, development within a SLA should retain and enhance the positive attributes of its landscape and seek to remove or mitigate any negative influences. In order to achieve this, the design, scale and location of development should respect the special landscape context. In particular, design should reflect the building traditions of the locality in its form, materials and details and aim to assimilate the development into the wider landscape.</p> <p>Merthyr Mawr Village is also designated as a Conservation Area in recognition of the area’s special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. In considering development proposals, the Council will seek to resist new development or the demolition of existing buildings unless it would preserve or enhance the character and appearance of the conservation area. (See Policy DNP11).</p>
--	--	---

488	Health is missing from your proposal. What about health services	What about health services	<p>The Council has been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations with the Deposit Plan progress.</p> <p>In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p>
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.	No changes proposed	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 Bryntirion 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 schools are already over subscribed. Basically any development of	Concerns relating to loss of green space, infrastructure, school's capacity, traffic, air quality, the historic environment and employment.	<p>The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned by 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.</p> <p>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. 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</p>

<p>large housing estates of this kind need to be on sites adjacent to the M4 or with routes to the M4 which will not add to the traffic chaos in the town centre/Broadlands/Laleston. They also need to be sensitive to existing historic villages which need to remain distinctly separate entities from the town of Bridgend or risk losing their entire character and becoming suburbs of the town itself.</p>		<p>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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan. As such, candidate site 308.C1 Bridgend (West of) was considered appropriate for allocation.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (See Deposit Policy PLA3 – Page 71). The provision of new residential dwellings, including affordable units, will be incorporated alongside a new one and a half form entry Primary School, recreation facilities, public open space, plus appropriate community facilities all set within distinct character areas.</p> <p>Policy PLA3 will ensure development positively integrate 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. Development must also incorporate the Laleston Trail within the central part of the site, providing access to the Bridgend Circular Walk and realigned Public Right of Way. Furthermore, the enclosed byway with the existing hedgerow corridor will be retained as the Y Berth cross link. In terms of active travel, Policy PLA3 requires 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 A473, with Bryntirion Comprehensive School and Bridgend Town Centre (including the bus station and train station). New connections will be provided to accord with the proposed routes within the Council's ATNM: INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58, INM-BR-127 and 2120.</p> <p>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).</p> <p>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</p>
---	--	--

		<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>While there is a small amount of evidence for late prehistoric and Roman activity in the surrounding 1km study area, the potential for archaeology of these periods within the site is deemed low. Post-medieval settlement was focused elsewhere in the locality and any archaeology of this period within the site is most likely to relate to agriculture. Overall, the baseline data indicate that the probability of significant archaeology being present is low. Any further archaeological investigation can reasonably be secured through an appropriately worded planning condition appended to a planning permission.</p> <p>Potential impacts upon the setting of historic assets in the locality have focused on the 1km study area. No significant effects arising from changes to setting have been identified for scheduled monuments, listed buildings and registered parks and gardens. In respect of the Laleston Conservation Area, there will also not be any significant changes to its visual setting. It is acknowledged that development in the southern part of the Site will remove a part of the agricultural landscape around Laleston which forms a buffer from Bryntirion to the east. However, agricultural land will remain on all sides around Laleston, which will retain its character as a</p>
--	--	---



			<p>discrete settlement, while landscaping measures associated with the development will mitigate any impression of coalescence. This is assessed as an impact of a minor order, with the special interest of the conservation area being retained. Policy PLA3 will require development to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.</p> <p>The site promoter also commissioned EDP to undertake a Landscape and Visual Appraisal (LVA). The purpose of the appraisal was firstly to inform the design evolution of the scheme which enabled an integrated approach to potential landscape and visual opportunities and constraints.</p> <p>The LVA outlines that there are adverse and beneficial landscape effects resulting from development of this site. However, the embedded mitigation and the approach to design is considered to minimise adverse effects over time as the proposed landscape establishes and overall the predicted effects are not considered unacceptable from a landscape and visual perspective in the context of the delivery of a strategic housing site.</p> <p>The appraisal included a review of national and local policy, landscape character and visual amenity. The appraisal included assessment of the National Landscape Character Assessment (NLCA), LANDMAP, and Landscape Character Assessment for Bridgend County Borough (LCABC) (2013) in addition to an on-site assessment. The appraisal confirms 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 design appraised responds sensitively to assets on site such as the Bridgend Circular Walk, the byway, the hedgerow network and vegetated site boundaries. As such the proposals put forward at this stage are considered to be a thoughtful and easily assimilated future development of this site.</p> <p>Mitigation measures include:</p> <ul style="list-style-type: none"><li>• The Laleston Meadows SINC would be brought into regular long-term management. This would protect the visual amenity and landscape character of this northern part of the site. A landscape buffer would set development back from the SINC, and dwellings would front onto it. The SINC could be used as a mitigation receptor site (in ecological terms) and the grazed fields currently within the SINC could be improved by the proposals as well as maintained in the long term. The SINC offers a great opportunity for informal and natural play on site provided increased public access would not clash with its ecological function;</li><li>• The site contains very few of the key characteristics listed in the published documents on Laleston SLA. The site has a strong network of hedgerows, some which would be lost and the field pattern replaced by urban form. However, the retained hedgerows and trees would be protected by landscape buffers and 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 shrubs proposed throughout the site for biosecurity, diversity of ecosystems and habitat creation as well as the visual amenity of future residents. Areas of open space would be bolstered by considered structural planting to create an aesthetically pleasing urban development which is well integrated with the proposed landscape strategy 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 the emerging proposals as it forms a desirable strong green framework that links with the wider green infrastructure to the north, west and south of the site;</li><li>• Adequate replacement planting of local species in appropriate locations to compensate for any loss of trees and hedgerows, and enhancement planting; and</li><li>• The location of public open space, public footpaths and the street-alignment has been designed to protect and reflect local character.</li></ul>
--	--	--	--

		<p>Through consideration of the findings above, it is anticipated that any notable landscape and visual effects resulting from the addition of the proposed scheme would be localised in extent and contained within a c.400m radius of the site, despite the site's relatively open character.</p> <p>Overall it is 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.</p> <p>Policy PLA3 will ensure that the design and layout of the site has regard to the landscape in which it sits, considering the interface between the site, Bridgend and Laleston. Visual impacts must be minimised through the inclusion of mitigation measures and provide links with the existing landscape and access features to safeguard landscape character whilst creating a sense of place. The development must also 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.</p> <p>In terms of biodiversity/ecology, an ecological desk study and Extended Phase 1 survey has been undertaken by EDP. The desk study has noted that within the Study Site's zone of influence there are a number of statutorily and non-statutory designated sites present, most notably Laleston Meadows SINC which overlaps with the site itself.</p> <p>Given the combination of designated sites, it is concluded that any future planning submission will need to consider the potential for direct and indirect impacts to arise upon qualifying features, including the Laleston Meadows SINC. However, it is inherent within the emerging masterplan that the Laleston Meadows SINC and its associated designated features will be retained. Furthermore, such retained features will be further protected from potential harm, damage and disturbance through the sensitive design of built development away from SINC boundaries and inclusion of suitable buffers.</p> <p>The desk study confirms that the inclusion of Laleston Meadows SINC within the Study's Site boundary will provide substantial potential for a balanced provision of areas of informal public open space and wildlife zones. When linked with proposed POS and play areas across the developable site this will provide a significant benefit to both visual and recreational amenity, conservation and biodiversity enhancement. In respect of the latter, the SINC provides a potential space to accommodate ecological mitigation and biodiversity enhancements and thus offset ecological impacts that may arise during the development of adjacent land.</p> <p>An Extended Phase 1 survey was undertaken in February 2020, supplemented by further roosting bat works in March 2020. 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. Habitats of greatest ecological importance 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 roosting bats surveys identified several trees with low to high potential to support a bat roost whilst onsite ponds have been considered for their potential to support great crested newt.</p> <p>The results of the desk study and Extended Phase 1 survey have influenced the masterplan which has sought to locate development across those habitats of predominantly limited ecological value whilst retaining boundary habitats as far as possible. Where retained, such features have been accommodated within proposed informal green space and sustainable transport links, which ultimately enhances connectivity throughout the Site and contributes to the wider green infrastructure resource.</p>
--	--	--

			<p>Where avoidance is not possible, however, and will result in the loss of internal field boundaries (albeit predominantly species-poor or defunct), the site is considered to be of sufficient size and extent to enable future development proposals to flexibly avoid and/or mitigate for any significant ecological constraints and compensate where necessary. This will be in addition to the sensitive positioning of built development away from retained boundary features to minimise damage.</p> <p>The report also highlights further detailed habitat and species surveys which are recommended to inform a planning application and ensure proposed mitigation is appropriate and proportional. These include a Dormouse survey, which was raised in comments received from NRW. Policy PLA3 will require the development to retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland) and Laleston Meadows SINC, which includes the green space bordering the northern and north-western boundaries of the site. PLA3 will also require the developer to submit and agree ecological management plans including proposals for mitigation, enhancement and maintenance for retained habitats and protected species (including for bats and dormouse) and provide appropriate compensatory and replacement habitat.</p> <p>Policy PLA3 will require development to incorporate the Laleston Trail within the central part of the site, providing access to the Bridgend Circular Walk and realigned Public Right of Way. Additionally, PLA3 requires 4.1 hectares of retained green infrastructure and new areas of public open space across the site comprising seven key areas of formal open space (including 0.5ha of 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.</p> <p>In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p> <p>With regards to education and comprehensive school provision, a contribution will be taken in accordance with the Education Facilities and Residential Development SPG and a decision will be made by the Local Education Authority as to how the sum will be utilised.</p> <p>In terms of sewerage, Dwr Cymru Welsh Water have confirmed that reinforcement works are required on both the clean and foul network to accommodate the site as a whole and a Hydraulic Modelling Assessment will be required to inform such works. They have also confirmed that there are no insurmountable obstacles to the delivery of the site.</p> <p>With respect of drainage, the site promoter has prepared a high-level drainage strategic of which confirms that the site is located with DAM Zone A, which is used within Technical Advice Note 15 to indicate that there is considered to be little to no risk of fluvial or tidal flooding at such a location. This reflected in comments received from NRW, and in the Strategic Flood Consequence Assessment (SFCA which informs the LDP and flags the site as green in its RAG assessment. As such, all proposed land uses are permitted without need for a flood consequence assessment. The SFCA does highlight that a small proportion of the site (4.9%) has a low risk of flooding due to surface water, which corresponds with topographic depressions running from north to south. There are two areas most at risk of surface water flooding. The first corresponds with a path of surface water flowing down into the north western corner of the site. This area of the site is currently comprised of woodland which is to be retained as part of the proposals. It is therefore considered that this area of surface water flood risk will have little influence on development proposals. The second area is a key surface water flow route that</p>
--	--	--	---

		<p>runs through the centre of the site towards the A473 where a small area of high surface water flood risk is shown. The surface water flow routes in this part of the site will be retained where possible and incorporated within the surface water drainage strategy through the use of SUDs and green corridors.</p> <p>A revised TAN15 is due to be implemented in June 2023. This will be supported by the new Flood Map for Planning, which includes climate change information to show how this will affect flood risk extents over the next century. It shows the potential extent of flooding assuming no defences are in place. A review of the new Flood Map for Planning shows the site to be located outside of any flood zone and is therefore considered at low or no risk of flooding</p> <p>In terms of the impacts on primary healthcare provision, the Council has been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations within the Deposit Plan progress.</p> <p>The site promoter commissioned Air Quality Consultants to undertake an Air Quality Assessment to assess the impact of the proposed development and subsequent increased traffic emissions arising from the additional traffic on the Air Quality Management Area (AQMA) of Park Street. Concentrations have been modelled for a number of worst-case receptors, representing existing properties where impacts are expected to be greatest. In addition, the impacts of traffic emissions from local roads on the air quality for future residents on the proposed development have been assessed.</p> <p>The assessment has demonstrated that concentrations of PM10 and PM2.5 will remain below the objectives at all existing receptors in 2022, with or without the proposed development, and that all impacts for these pollutants will be negligible.</p> <p>In the case of annual mean nitrogen dioxide, concentrations will remain below the objective at all but one existing receptor (representative of 6-8 homes) in 2022, with or without the proposed development. However, it is now considered unlikely that any new homes within the development will be occupied before 2024, by which time it would be reasonable to expect concentrations at these 8 homes to be below the objective. The assessment has demonstrated that the impacts in terms of annual mean nitrogen dioxide concentrations of the full development traffic being on the roads in 2022 will be negligible everywhere other than at this one receptor, where the impact under this scenario would be moderate adverse. However, bearing in mind that no new homes will be occupied before 2024, and the development is unlikely to be complete and thus generating its full traffic volumes until the 2030s, this scenario is unrealistically worst-case. Applying professional judgement, it is considered most likely that the actual impact of the development at these 8 homes will also be negligible in all years from the first occupation in 2024.</p> <p>The effects of local traffic on the air quality for future residents living in the proposed development have been shown to be acceptable at the worst-case locations assessed, with concentrations being well below the air quality objectives. As such, the overall operational air quality effects of the development are judged to be 'not significant</p> <p>The proposed allocation is supported by detailed masterplanning work, including an illustrative block plan to identify a realistic dwelling yield on the site's net developable area. The Transport Assessment reflects the number of dwellings the site is expected to deliver. This identifies the various transport issues relating to the</p>
--	--	---

		<p>proposed development, and, in combination with the Strategic Transport Assessment, what measures will be taken to deal with the anticipated transport impacts of the scheme. Proposed Policy PLA3 prescribes the appropriate development requirements in relation to all forms of travel. For the avoidance of any doubt, this number of dwellings does not require the original proposed site boundary to be expanded, rather more efficient use of the existing net developable area. The density and mix of uses proposed is considered appropriate to support a diverse community and vibrant public realm, whilst generating a critical mass of people to support services such as public transport, local shops and schools. In accordance with national planning policy, higher densities should be encouraged in urban centres and near major public transport nodes or interchanges. Given the site's location within the Primary Key Settlement of the County Borough and the proximity to Bridgend Town Centre, this density level is therefore considered appropriate to foster sustainable communities, further bolstered by the proposed enhancements to the active travel network.</p> <p>The Replacement LDP aims to reduce private car reliance and help the County Borough achieve the principles set out by the Active Travel (Wales) Act 2013, with the ultimate aim of improving and expanding upon the current active travel routes as identified in the Existing Route Maps. Consideration of active travel has been key during the master planning of strategic sites in the County Borough. Reference to the Active Routes detailed in Policy PLA3 in conjunction with Policy PLA12 should be considered essential in the delivery of any strategic site or any proposal, ensuring that development is contributing to the promotion of a sustainable and healthy lifestyle.</p> <p>The Active Travel Network Maps aim to improve access to key services and facilities including town centres, employment sites, retail areas and transport hubs, improved access to education facilities such as schools and colleges and improvements to, and expansion of, the existing strategic cycle network in the County Borough. Opportunities will be maximised to further improve upon these routes, providing walking connections which will allow integration between new developments and existing communities.</p> <p>Whilst developments should be encouraged in locations which reduce the need to travel and promote the use of sustainable transport, the Council recognises that any development growth will likely result in greater travel demand, and that increased traffic levels and congestion is likely to occur if appropriate mitigating transport measures and infrastructure are not delivered. Therefore a Strategic Transport Assessment (See Appendix 36) has been undertaken to consider the impact of plan proposals and help guide and inform the process of delivering land allocations by means of modelling and quantifying the transport impact of these proposals. The technical notes accompanying this assessment demonstrate that the proposed level of development detailed within the LDP can be accommodated within the BCBC Highway Network with suitable mitigation.</p> <p>Furthermore Strategic Policy 5: Sustainable Transport and Accessibility will ensure that development must be located and designed in a way that minimises the need to travel, reduces dependency on the private car and enables sustainable access to employment, education, local services and community facilities. Development will be required to deliver, or contribute towards the provision of, active travel scheme, public transport measures, road infrastructure, and other transport measures, in accordance with the Bridgend Local Transport Plan and the Bridgend Integrated Network Plan (See Appendix 29).</p> <p>Proposed Policy PLA3 prescribes a number of placemaking principles for Land West of Bridgend, which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. Such requirements include pursuing 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. There will be a clear emphasis on providing safe pedestrian and cycling linkages along the A473, with Bryntirion Comprehensive School and Bridgend Town Centre (including the bus station and train station). New connections will be provided to accord with the proposed routes within the Council's ATNM: INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58, INM-BR-127 and 2120. PLA3 will also</p>
--	--	--

			<p>require development to provide a new shared cycle / footway on the northern side of the A473, connecting the site with active travel route INM-BR-57 linking to the shops at Bryntirion to the east, and a widened footway to the west of the site to provide a connection to the eastbound bus stop on the A473.</p> <p>Policy PLA3 will require on-site highway improvements to ensure the principal point of vehicular access is achieved from a new signalised junction with the A473 at the southern boundary; the junction will accommodate a new-shared use crossing to connect the internal cycleway/footway with the existing active route BRC9b on the southern side of the A473.</p> <p>The site promoter's Transport Assessment confirms that the traffic effect of 850 dwellings is forecast to be in the order of 269 and 243two-way movements in the AM and PM peak hours respectively, although this is considered worst case as attitudinal change towards travel progresses. This quantum of trips equates to just over 4vehicles per minute two-way, diluted across the local highway network. 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. Working from home and from a third-place such as a non-site Workhub will be encouraged from the outset, in line with Welsh Government's aspirations.</p> <p>Furthermore, the Council have prepared a Sustainability Appraisal (SA) to inform the Replacement LDP (See Appendix 9) of which was carried out to identify the likely significant environmental and wider sustainability effects from the Deposit Plan. It also considers whether any mitigation and enhancement measures should be incorporated within the Replacement LDP to ensure the avoidance of likely significant adverse effects and to enhance the effectiveness of the plan. The findings of the SA indicate that the proposed development with its proposed range of land uses will likely produce a wide range of significant beneficial effects.</p>
1097	<p>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</p>	Support for PLA3.	Support noted.

	<p>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 concerns rightly raised relate to 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.</p>		
403	<p>We write as agents for part of the above 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.</p>	Support for PLA3.	Support noted.

	<p>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.</p>		
1444	<p>I am a local resident and owner of part of 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</p>	Support for PLA3.	Support noted.



<p>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</p>		
---	--	--

	<p>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.</p>		
223	<p><b>Bridgend Land West of</b></p> <p>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:</p> <p>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.</p> <p>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.</p> <p><i>The Candidate Sites and Sustainability Appraisal</i> 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</p>	<p>Support the allocation of Land West of Bridgend for progression within the Replacement LDP.</p>	<p>Comments noted.</p> <p>All allocations have been proposed based on the outcome of the Candidate Site Assessment, their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All new proposed allocations are considered to demonstrate delivery in accordance with the requirements set out in the Development Plans Manual. All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access 10 requirements, design parameters, s106 requirements, infrastructure and costs. This process provides a high degree of confidence that the sites included within the Deposit Plan are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.</p>

<p>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.</p> <p>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.</p> <p>The Bridgend RLDP Deposit Plan Sustainability Appraisal undertaken by Stantec, May 2021 overall identifies that the land west of Bridgend <b>will have greater likely significant beneficial</b> effects than likely significant adverse effects. The two identified likely adverse effects are in relation to: -</p> <ul style="list-style-type: none"><li>i. SA3e Employment and Skills which requires demonstration of the accessibility of existing secondary education infrastructure to accommodate the development and,</li><li>ii. SA4b to demonstrate the level and acceptability of impacts on the surrounding road network.</li></ul> <p>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.</p>		
--	--	--

<p>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.</p> <p>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.</p> <p>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.</p>		
--	--	--

<p>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.</p> <p>Llanmoore 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. Llanmoore 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.</p> <p>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'.</p> <p>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</p>		
---	--	--

<p>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.</p> <p><i>Settlement Assessment Study</i> 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:</p> <ul style="list-style-type: none"><li>i. Sustainable transport and accessibility to reduce the need to travel by car,</li><li>ii. Availability of facilities and services to consider whether the current provision can support the current and future population, and</li><li>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.</li></ul> <p><i>Local Housing Market Assessment</i> 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</p>		
---	--	--

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

<p>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.</p>		
---	--	--

*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

<p>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.</p> <p>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.</p> <p><i>Green Wedge</i> 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.</p> <p>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</p>		
--	--	--

<p>LDP – Deposit Plan that it is not necessary to take forward the green wedge police into the Replacement LDP.</p> <p>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.</p> <p><i>Green Infrastructure</i> 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.</p> <p>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.</p> <p>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.</p>		
--	--	--

<p>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 it is 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.</p> <p><b>Conclusion</b> 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 stand by 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.</p> <p><b><u>Land South of Bridgend (Island Farm)</u></b></p> <p>Llanmoor do not question the allocation of housing numbers to Bridgend, as the Primary Key Settlement within the County Borough. It is noted that the 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</p>	<p>Change to housing trajectory for Land South of Bridgend (Island Farm)</p>	<p>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</p>
---	--	--

<p>the relocation of Heronsbridge Special Educational Needs School in addition to providing up to 850 homes.</p> <p>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 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.</p> <p>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</p>		<p>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 South of Bridgend (Island Farm) trajectory is both unsubstantiated and not supported.</p>
--	--	--

<p>and it is considered that this should be moved back to 2027-2028.</p> <p><b>Land East of Pencoed</b></p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Change to housing trajectory for Land East of Pencoed</p>	<p>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.</p>
---	--	--

	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	<p><b>Bridgend Land West of</b></p> <p>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.</p> <p>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.</p> <p><i>The Candidate Sites and Sustainability Appraisal</i></p>	No changes proposed. Continue to support the allocation of Land West of Bridgend for progression within the Replacement LDP.	<p>Comments noted.</p> <p>All allocations have been proposed based on the outcome of the Candidate Site Assessment, their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All new proposed allocations are considered to demonstrate delivery in accordance with the requirements set out in the Development Plans Manual. All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access 10 requirements, design parameters, s106 requirements, infrastructure and costs. This process provides a high degree of confidence that the sites included within the Deposit Plan are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.</p>

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.

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.

*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:

- iv. Sustainable transport and accessibility to reduce the need to travel by car,
- v. Availability of facilities and services to consider whether the current provision can support the current and future population, and
- vi. 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.

*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 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’.

*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 it is 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

<p>has been provided by Llanmoor to demonstrate the proposal is sustainable, deliverable and viable at each stage of the plan process. Llanmoor stand by 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.</p> <p><b>Land South of Bridgend (Island Farm)</b> 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.</p> <p>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.</p>	<p>Change to housing trajectory for Land South of Bridgend (Island Farm)</p>	<p>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 Meeting. As such, the proposed change to Land South of Bridgend (Island Farm) trajectory is both unsubstantiated and not supported.</p>
--	--	--



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.

	<p>there appear to be several unknowns relating to the delivery of infrastructure.</p> <p>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.</p>		
253	<p>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 where they would be vulnerable to coalescence. For</p>	De-allocate Land West of Bridgend	<p>As documented in the Candidate Site Assessment, the Land West of Bridgend 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 delivery of the site, 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 such, the proposal to remove Land West of Bridgend from the Replacement LDP is not supported.</p>

<p>this reason, this site is not considered appropriate for the scale of development proposed.</p> <p>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.</p>	<p>Change to housing trajectory for Parc Afon Ewenni, Bridgend</p>	<p>In terms of Parc Afon Ewenni, 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.</p> <p>Nevertheless, 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.</p>
--	--	--

	<p>Change to housing trajectory for Land East of Pencoed</p>	<p>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. All constraints highlighted by the representor have been duly considered throughout this process and prior to Deposit Plan stage. 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 such, the proposal to delay the site housing trajectory is not supported.</p>
<p>1165 <b>Re-consideration of the Land East of Pencoed Allocation</b></p> <p>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</p>	<p>Query on whether Land East of Pencoed is deliverable in whole or in part.</p>	<p>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. All constraints highlighted by the representor have been duly considered throughout this process and prior to Deposit Plan stage. 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 concerns highlighted regarding Land East of Pencoed's deliverability are both unsubstantiated and not supported.</p>

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, queries 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

<p>required to ensure this site is deliverable in whole or in part.</p> <p><b>Commentary upon SP2 (2) – Land South of Bridgend</b></p> <p>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.</p> <p><b>Land at Penprysg Road, Pencoed</b></p> <p>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</p>	<p>Query on whether Land South of Bridgend is deliverable in whole or in part.</p> <p>Allocate Land at Penprysg Road, Pencoed (Candidate Site: 87.C1)</p>	<p>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 Meeting. As such, the concerns highlighted regarding Land South of Bridgend (Island Farm) deliverability are both unsubstantiated and not supported.</p> <p>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: 87.C1) specifically, the Assessment states, “The candidate site is located on the periphery of Pencoed, which is identified as Sustainable Growth Area (as defined by SP1). There are highway issues associated with the site in addition to 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”.</p> <p>Whilst the Council notes the representor’s objection to this conclusion, the proposal is not supported for the reasons outlined.</p>
--	---	---

clients wish to, once again, raise these development opportunities to the Local Authority's attention and seek its 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 than 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	<p>As an established firm of Estate Agents and Chartered Surveyors dating back to 1857 with offices based in Cowbridge, Bridgend and Penarth, Watts &amp; Morgan LLP are clearly interested in the Replacement Local Development Plan (RLDP) which is currently out for consultation. The plan discusses in detail the visions and objectives of Bridgend County Borough Council, regarding areas such housing. In practice we support the RLDP's preferred strategy for housing to the west of Bridgend and are in fact in full support 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 &amp; 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 &amp; 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</p>	<p>Support the Deposit Plan, particularly the allocation of Land West of Bridgend.</p>	<p>Comments noted.</p> <p>All allocations have been proposed based on the outcome of the Candidate Site Assessment, their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All new proposed allocations are considered to demonstrate delivery in accordance with the requirements set out in the Development Plans Manual. All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access 10 requirements, design parameters, s106 requirements, infrastructure and costs. This process provides a high degree of confidence that the sites included within the Deposit Plan are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.</p>
------	---	--	---

<p>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 &amp; 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 &amp; 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 &amp; Morgan are aware of the detailed analysis that has gone into the Llanmoor solution, and fully endorses their proposals. As a high-level statement focused around using placemaking to achieve regeneration and economic growth Watts &amp; 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 &amp; Morgan LLP</p>		
--	--	--

	<p>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 &amp; 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 &amp; 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 &amp; 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 &amp; 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.</p>		
221	<p><b><u>Land at Broadlands (221.C1)</u></b></p> <p>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'.</p>	<p>Allocate Land at Broadlands (Candidate Site ref: 221.C1)</p>	<p>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 Report confirms and provides reasoned justification for the outcome of the site selection process in respect of each candidate site.</p> <p>In relation to Land at Broadlands, the Candidate Site Assessment states,</p> <p>"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".</p>

<p>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). The evidence presented 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.</p> <p>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</p>		<p>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.</p> <p>For purposes of clarity, while the representor states Parc Afon Ewenni COM1(1) is not "required to provide on-site 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.</p>
---	--	--

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 site within 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 2 and 3).

Candidate Site Assessment

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.

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 current education capacity 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,

<p>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 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:</p> <ul style="list-style-type: none"><li>• Provision financial contributions for an upgrade to the school provision planned within the wider West Bridgend (SP2(3) / PLA3) allocation; or</li><li>• 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)</li></ul> <p>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':</p> <p>By virtue of the Deposit Plan allocation (SP2(3) / PLA3), the development of the West Bridgend site is to provide:</p> <ul style="list-style-type: none"><li>• 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;</li><li>• 4 ha of land to facilitate the relocation of Heronsbridge Special Needs School;</li><li>• 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.</li></ul>		
---	--	--



<p>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.</p> <p>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.</p> <p>The schedule identifies that the only likely significant adverse effect after policy level mitigation attributed to both the Broadlands sites is: "SA3e (Employment &amp; 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</p>		
--	--	--

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 /

	<p>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</p>		
221	<p><b><u>Land south of Coychurch (221.C3)</u></b></p> <p>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’.</p> <p>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</p>	<p>Allocate Land South of Coychurch (Candidate Site ref: 221.C3)</p>	<p>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 Report confirms and provides reasoned justification for the outcome of the site selection process in respect of each candidate site.</p> <p>In relation to Land South of Coychurch, the Candidate Site Assessment states,</p> <p>“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”.</p> <p>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 South of Coychurch being allocated.</p>

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 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 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

<p>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.</p>		
<p><u>Education</u>  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 wider 21st Century Schools / School</p>	<p>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</p>	<p>The Candidate Site Assessment references the fact that the proposed development would have a significant impact on local education provision without providing a new education facility on site. It is noted that the representor has stated "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" since publication of the Deposit Plan. However, it is unlikely that the quantum of development proposed would give rise to a new primary school alone, and, therefore, whether the development would be sufficient in critical mass to fund a new primary school.</p> <p>The representor's accompanying Independent Financial Viability Appraisal states, "The sums allowed in each IFVA for each site's financial contribution to educational facilities are based on discussions with BCBC about the capacity of existing schools and colleges in the vicinity of each site; as well as the level of contribution (in £ per pupil place) that would be necessary to expand existing (or create new) provision, where necessary. The calculation of financial contributions has been based on the updated SPG 16, which was formally adopted by BCBC in March 2021". However, the accompanying proposed masterplan has not been revised to include this newly proposed one form entry school, and, moreover, it remains unclear whether provision of a new primary school would be viable and deliverable on the site.</p> <p>In addition, siting a new school on the periphery of Bridgend, and one that would not solely cater for additional pupils generated from Land South of Coychurch, could promote unsustainable travel patterns from pupils travelling from other parts of the County Borough.</p> <p>For the reasons mentioned above, this proposal is not supported.</p>

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.

#### 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 sets out extracts from the SA for the sites allocated in the Deposit (strategic and non-strategic) and the land south of Coychurch (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 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 Coychurch 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 destinations such as Pencoed 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 shift 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 shift 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 shift 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.

Comparison with 'Other Sites' (Parc Afon Ewenni)

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 should 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 during 2024/25, followed by 80 dwellings per year thereafter until 2033/33. 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 seeks to continue to provide a land use framework that helps realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033. The undeveloped brownfield regeneration allocations identified in the existing LDP are proposed to be retained and supplemented with sustainable urban growth in settlements that demonstrate strong employment, service and transportation functions. This approach is essential to implement the long term regeneration strategy embodied within the Replacement LDP Vision and represents a necessary degree of continuity from the existing LDP.

For Parc Afon Ewenni, 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.

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 questioned. 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 over-reliance 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 been 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 on-board 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 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 agricultural land is 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.

	<p>discount the site for much needed residential development.</p> <p><u>Summary</u>  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.</p>	<p>Allocate Land South of Coychurch (Candidate Site ref: 221.C3)</p>	<p>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 Report confirms and provides reasoned justification for the outcome of the site selection process in respect of each candidate site.</p> <p>In relation to Land South of Coychurch, the Candidate Site Assessment states,</p> <p>"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".</p> <p>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 South of Coychurch being allocated.</p>
38	Support	None	Comments noted.
394	Support	None	Comments noted.

1388	<p><b>Letter of support for Strategic Site- Land West of Bridgend, also raising additional comments and concerns regarding misinformation being circulated by objectors.</b></p> <p>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 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.</p> <p><b><u>Template/letter of Objection</u></b></p> <p><b>Further housing is not necessary at this location.</b></p> <p>REPLY on behalf of Llanmoor Development Co. Ltd.</p> <ul style="list-style-type: none"> <li>• An evidence base has been created as part of the LDP supporting documentation.</li> <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>	<p>No changes being proposed. Representor supports the allocation of Land West of Bridgend and responds to concerns raised by objectors.</p>	<p>Comments noted.</p> <p>All allocations have been proposed based on the outcome of the Candidate Site Assessment, their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis. All new proposed allocations are considered to demonstrate delivery in accordance with the requirements set out in the Development Plans Manual. All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access 10 requirements, design parameters, s106 requirements, infrastructure and costs. This process provides a high degree of confidence that the sites included within the Deposit Plan are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.</p>
------	--	--	---

<p>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.</p> <ul style="list-style-type: none"><li>• 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</li><li>• Affordable housing will be provided to the 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.</li></ul> <p><b>Infrastructure is not in place to support further development.</b></p> <p>REPLY on behalf of Llanmoor Development Co. Ltd.</p> <ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li></ul>		
---	--	--



<ul style="list-style-type: none"><li>• 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.</li><li>• 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.</li><li>• 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).</li></ul> <p><b>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.</b></p> <p>REPLY on behalf of Llanmoor Development Co. Ltd.</p> <ul style="list-style-type: none"><li>• 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.</li></ul> <p><b>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.</b></p> <p>REPLY on behalf of Llanmoor Development Co. Ltd.</p>		
---	--	--

• 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

being encouraged by Welsh Government to enable and encourage remote working and promote less car-based journeys. The future development of the site is supported by a suite of evidence based technical documents which have assessed the impacts and benefits of the proposed development to ensure a planning balance can be achieved to meet the policy makers requirements and the communities' future needs.

**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.**

REPLY on behalf of Llanmoor Development Co. Ltd.

- The SINC in the northern section of the site is to remain protected, with the option for this to be handed to the Council (together with a payment for future maintenance) for long term protection.

- Hedgerows and trees are being maintained, other than where it is necessary to transect them to facilitate access for roads or cycleways/footpaths between the fields.

- Generally, the land is currently intensively farmed and therefore has a low biodiversity value.

- The development of the site has the potential to increase the biodiversity offer and value of the site.

**This urbanisation would create an undesirable precedent for further urbanisation to south, north and west.**

REPLY on behalf of Llanmoor Development Co. Ltd.

- The future growth of Bridgend will be 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.
- 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 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’

	<p>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.</p>		
1390	<p>Our client supports the proposed re-allocation of Parc Afon Ewenni for mixed-use development within the Deposit Plan by virtue of:</p> <ul style="list-style-type: none"> <li>• Policy COM1(1) (Housing Allocations) – For housing up to 675 dwellings (including 135 affordable units);</li> <li>• Policy ENT1(7) (Employment Allocations) – For employment site for up to 2.0 ha of Class B1, B2 and B8 use.</li> </ul> <p>The Deposit Plan’s acknowledgement of the importance of the Parc Afon Ewenni site forming part of the Southern Bridgend Gateway and its’ significance in the Regeneration and Sustainable Growth Strategy is likewise endorsed. These representations are made with regard to a limited alteration to the scope of the mixed-use allocation, to allow for an increased provision of retail, leisure and other commercial use on our client’s land ownership, to safeguard and enable the future deliverability of the site as a whole.</p> <p><u>Background</u> 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</p>	<p>Support the re-allocation of Parc Afon Ewenni</p> <p>Allocate 2,900sqm net retail floorspace on Parc Afon Ewenni due to a ‘viability gap’</p>	<p>Comments noted. However, the Council has now removed Parc Afon Ewenni 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.</p> <p>The (2019) Retail Study has calculated comparison and convenience retail needs based on the constant market shares approach, which assumes that existing shopping patterns will remain stable over the LDP period (2018 – 2033). The Study identifies limited quantitative needs across the County Borough and qualitative retail needs in Bridgend (to improve comparison fashion, leisure and the general shopping environment) and Porthcawl (to improve main food shopping offer). This reflects market trends which are likely to influence demand for new retail and commercial leisure floorspace across the LDP period.</p>



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.

	<p>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.</p> <ul style="list-style-type: none"> <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 of the wider allocated site.</li> </ul>		<p>Whilst the representor claims that there is a 'viability gap' due to 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', no independent financial viability assessment has been provided to verify these claims. Equally, no viability assessment has been provided by the representor to demonstrate that additional 'enabling' retail would impact positively on the development's viability in this respect.</p> <p>However, a comprehensive independent viability assessment was undertaken by Burrows-Hutchinson Ltd prior to and post publication of the Deposit Plan. This assessment, which considered the viability and deliverability of the whole proposed Parc Afon Ewenni allocation, did not identify any such viability gap. The appraisal demonstrated the site was viable and deliverable with 20% affordable housing provision. The appraisal included the assumption that the overall development would include a net lettable area of 1,115 sqm (12,000 sq ft) for new retail uses, including a small convenience store of 372 sqm (4,000 sq ft), a level of retail provision compatible with the existing outline consent. However, and crucially, the conclusions from this appraisal showed that the extent and use of commercial floorspace is unlikely to have a significant impact, either positive or negative, on the financial viability of the site as a whole.</p> <p>On this basis, the proposal to allocate 2,900sqm net retail floorspace on Parc Afon Ewenni due to an unsubstantiated 'viability gap' is not supported. Indeed, the representor's proposal would be of detriment to the Town Centre First principle enshrined in national policy and promoted by the Replacement LDP Strategy.</p>
1404	<p>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.</p>	<p>Allocate Land at Penylan House, Pencoed</p>	<p>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.</p> <p>The proposal to allocate Land at Penylan House, Pencoed represents an alternative site submission and one that was not submitted at Candidate Site or Preferred Strategy Stage. As stated in the Development Plans Manual (edition 3), "It is at the discretion of the LPA how to deal with candidate sites submitted after the close of the preferred strategy consultation" (para 3.27).</p> <p>Whilst the representor has provided a high level SA, concept plan, transport appraisal and a preliminary ecological appraisal in support of this alternative site proposal, a range of supporting technical evidence is missing, including a viability assessment and utilities strategy. A range of other reserve sites are further advanced in terms of their supporting evidence base and, therefore, the representor's proposal to allocate this alternative site is not supported.</p>
219	<p>Bridgend College (BC) is a Further Education (FE) College and the owner of the Pencoed College Campus, proposed as a sustainable</p>	<p>Supports allocation of Land East of Pencoed</p>	<p>Comments of support noted.</p>

<p>growth area in the deposit plan under policy PLA4. BC has promoted the site and worked to provide supporting information and justification for the allocation through the 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 policies 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.</p> <p>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</p>	<p>as a means of delivering the growth strategy</p>	
--	---	--

<p>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.</p>		
<p><b>PLA7: Development West of the Railway Line, Pencoed</b></p> <p>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.</p>	<p>PLA7: No changes being proposed.</p>	<p>Comments noted.</p>
<p><b>COM1: Housing Allocations &amp; PLA4 Land East of Pencoed</b></p> <p>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.</p> <p>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.</p> <p>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 below.</p>	<p>SP2(4) and COM1: No changes being proposed.</p>	<p>Comments of support noted.</p>

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 continue to assist BCBC in demonstrating its technical acceptability and deliverability to enable its allocation within the emerging 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'

<p>with 'should' will provide the flexibility required (within reason) to ensure that the policy will deliver on its main intention.</p>		
<p><b>Suggestion 2</b></p> <p>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.</p> <p>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.</p> <p>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.</p>	<p>Amend Policy PLA4 to reduce the primary school requirement from a 1.5 form entry school to a 1 form entry school and also remove the expansion land buffer.</p>	<p>The Council's Education Department have advised that the development will generate need for a 1.5 form entry primary school. Therefore, the representor's suggested change to PLA4 is not supported.</p> <p>In the interests of future sustainability, provision of a 1.5 form entry primary school will necessitate 2.3ha of land being set aside for construction of the new school, inclusive of a 0.46ha land buffer to enable future expansion. The proposal to remove this land buffer is not supported.</p>
<p><b>Suggestion 3</b></p> <p>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</p>	<p>Amend PLA4 to make reference to two vehicular access points</p>	<p>The Council agrees to this proposed amendment. The specific wording of PLA4 will be revised to ensure the principal point of vehicular access is from the south of the site (off Felindre Road), with secondary access from the north of the site (off the A473).</p>

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.

**REVISED POLICY SUGGESTION:**

PLA4: Land East of Pencoed, Pencoed Sustainable Growth Area

Site Size: 44.27 ha

Allocation Type: Strategic Mixed-use Sustainable Urban Extension

Land Uses: **circa** 770 residential units

- 20% Affordable units
- ~~2.3ha~~ 1.25ha for ~~4.5~~ 1 FE Primary School
- **circa** 6 ha of Outdoor Recreation Facilities
- Active Travel routes

Phasing Tranche Refer to trajectory

2018-2022: 0  
2023-2027: 290  
2028-2033: 480

Land East of Pencoed, as shown on the Proposals Map, is allocated for a comprehensive mixed-use development. The site will deliver circa 770 homes during the Plan period (20% / 154 of which will be affordable housing units), incorporating a new ~~4.5~~ 1 form entry primary school, recreation facilities, public open space, plus appropriate community facilities 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

Proposed changes being sort to Policy PLA4.

Comments noted. However, Development Plans Manual Edition 3 requires the site allocations policy to set out clearly the number of units (private and affordable) and broad phasing tranches. Table 17: 'Site Allocations Policy Table' recommends that the total units in the plan period for each allocation should be clearly specified. Therefore, Policy PLA2 is considered appropriate in the current form.

The Council's Education Department have advised that the development will generate need for a 1.5 form entry primary school. Therefore, the representor's suggested change to PLA4 is not supported.

The Outdoor Recreation Facilities requirements are considered appropriate in the current form.

The Planning Inspectorate has advised that 'must' is appropriate terminology for Strategic and Development Management Policies. Therefore, the proposed changes to PLA4 are unsubstantiated and not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.



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 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) 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.

<p><b>DEVELOPMENT REQUIREMENTS</b></p> <p>The development <del>should</del> <b>must</b> provide the following requirements:</p> <p>1) <b>circa</b> 770 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 <del>in sustainable clusters of no more than ten units as per the Council's requirements;</del></p> <p>2) <del>2.3</del> 1.25 hectares of land to accommodate a <del>4.5</del> 1 form entry primary school with colocated nursery facility and a <del>proportionate</del> 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 through Section 106 Planning Obligations in accordance with the Education Facilities and Residential Development SPG.</p> <p>The school must be accessible to new and existing residents by all travel modes, enabled by the development;</p> <p>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;</p> <p>4) <b>Provide vehicular access from Felindre Road and /or the A473</b> <del>Deliver highway improvement to ensure the principal point of vehicular access is off the A473;</del></p> <p>5) Provide off-site highway improvements with regard to the requirements arising <b>through assessment of the proposals at planning application stage</b> <del>from the Transport Assessment and as identified in the Transport Measures Priority Schedule.</del></p>	<p>Proposed changes being sort to Policy PLA4.</p>	<p>Comments noted, however, the Planning Inspectorate has advised that 'must' is appropriate terminology for Strategic and Development Management Policies. Therefore, the proposed changes to PLA4 are unsubstantiated and not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p> <p>With reference to the specific suggestions:</p> <ol style="list-style-type: none"> <li>1) The representor's proposal to remove reference to clusters of ten affordable units is not supported. The rationale for this policy requirement is clearly set out in the Affordable Housing Background Paper and is consistent with Policy COM3. Delivery of affordable housing through sustainable clusters of no more than ten affordable units, interspersed throughout the respective developments, is considered fundamental to ensure delivery of balanced, mixed-tenure, sustainable communities. Discrete clusters of more than 10 affordable units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities.</li> <li>2) The Council's Education Department have advised that the development will generate need for a 1.5 form entry primary school. Therefore, the representor's suggested change to PLA4 is not supported. In the interests of future sustainability, provision of a 1.5 form entry primary school will necessitate 2.3ha of land being set aside for construction of the new school, inclusive of a 0.46ha land buffer to enable future expansion. The proposal is not supported.</li> <li>4) The specific wording of PLA4 will be revised to ensure the principal point of vehicular access is from the south of the site (off Felindre Road), with secondary access from the north of the site (off the A473).</li> <li>5) Para 5.109 National planning policy (PPW) states the provision of adequate and efficient infrastructure to deliver the plan is essential. It is essential that strategic site policies reference the IDP and Transport Priority Schedule to ensure consistency with the Development Plans Manual that states 'LDPs should clearly indicate when proposals and allocations are expected to come forward, links to any required infrastructure, identify necessary infrastructure improvements and clearly state who will be responsible to fund such improvements at what point in the plan period to facilitate development'. Therefore, the Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</li> <li>6) The Replacement LDP aims to reduce private car reliance and help the County Borough achieve the principles set out by the Active Travel (Wales) Act 2013, with the ultimate aim of improving and expanding upon the current active travel routes as identified in the Existing Route Maps.</li> </ol> <p>Bridgend County Borough Council has produced Active Travel Network Maps to identify the walking and cycling routes required to create fully integrated networks for walking and cycling to access work, education, services and facilities. The Council's Active Travel Network Maps set out detailed plans for a network of active travel routes and facilities in the County Borough over the next 15 years. Further information is contained in the Active Travel Network Maps which can be viewed on the Council's website. The Active Travel Network Maps aim to improve access to key services and facilities including town centres, employment sites, retail areas and transport hubs, improved access to education facilities such as schools and colleges and improvements to, and expansion of, the existing strategic cycle network in the County Borough.</p> <p>The routes and proposals shown on the Active Travel Network Maps are indicative alignments that may be subject to change as routes are further developed. Opportunities should be maximised to further</p>
---	--	---

	<p>6) Provide 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. <b>This could include</b> improved linkages <del>must be provided</del> along the A473, with Pencoed Comprehensive School, Pencoed Technology Park and Pencoed Town Centre (including the train station and bus stops). 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-PE-2, INM-PE-8, INM-PE-13 and INM-PE-15;</p> <p>7) Retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or SemiAncient Woodland), and SINCs.</p> <p>8) Submit and agree ecological management plans including proposals for mitigation, enhancement and maintenance for retained habitats and protected species (including for bats and dormouse) and provide appropriate compensatory and replacement habitat;</p> <p>9) On and off-site measures including any appropriate upgrades to the clean water supply or public sewerage networks; and</p> <p>10) Follow the sequential approach to identify low carbon heating technologies in accordance with ENT10.</p>		<p>improve upon these routes, providing walking connections which will allow integration between new developments and existing communities.</p> <p>Implementation of this policy will be facilitated through the development process. When considering development proposals, the design layout will be considered and priority will be given to the proposals that incorporate walking and cycling. A high quality design which makes a positive contribution to the distinctiveness of communities and places will be essential in ensuring walking and cycling is an attractive and popular option of travel. Developers should therefore ensure the key principles of design are employed to deliver active travel. Adherence to the Active Travel Act Design Guidance and other relevant guidance can aid in the delivery of standards of good practice.</p> <p>Consideration of active travel will be key during the master planning of strategic sites in the County Borough. Reference to the Active Routes detailed in Policy PLA2 in conjunction with Policy PLA12 should be considered essential in the delivery of any strategic site or any proposal, ensuring that development is contributing to the promotion of a sustainable and healthy lifestyle. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p>
219	<p>Bridgend College is the owner and promoter of the Land East of Pencoed, proposed for allocation as the Pencoed Sustainable Growth Area in the deposit plan under policy PLA4. Bridgend College has worked proactively with BCBC having provided a package of technical documentation to demonstrate that the site is deliverable, sustainable, and viable. Likewise, Bridgend College has provided further supporting information with regards to the capacity of the site, the timescales for delivery, and how it aligns with the</p>	<p>Supports allocation of Land East of Pencoed</p>	<p>Comments noted.</p>

	<p>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 policies 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.</p>		
399	<p><u>Parc Afon Ewenni</u></p> <p>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</p>	<p>Concerns over the deliverability of Parc Afon Ewenni</p>	<p>The Council has now removed Parc Afon Ewenni 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.</p> <p>Nevertheless, 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.</p>

	<p>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.</p>		
407	<p>COM1: Housing Allocations 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. 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.</p> <p>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).</p>	No changes being sought.	Comments of support acknowledged.

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.

<p>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).</p>		
<p>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.</p>		
<p>As set out below HD Ltd 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</p>	<p>Proposed changes being sort to Policies Land South of Bridgend site (SP2(2)) and the</p>	<p>Comments noted. However, Development Plans Manual Table 17: 'Site Allocations Policy Table' recommends that the total units in the plan period for each allocation should be clearly specified. Therefore, Policy PLA2 is considered appropriate in the current form.</p>

<p>mode. Comments and concerns about the policy wording as drafted, and suggested changes to the wording are set out below.</p> <p><b>Suggestion 1</b> The first concern is over the <u>rigidity of the land uses as described within the policy text</u>. 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 . 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 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.</p>	<p>Craig y Parcau site (COM1(2)).</p>	<p>See response below.</p>
---	---------------------------------------	----------------------------



**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 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 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**

“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

See response below.

<p>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.</p> <p><b>REVISED POLICY SUGGESTION:</b></p> <p>PLA2: Land South of Bridgend (Island Farm), Bridgend Sustainable Growth Area Site Size: 49.95 ha</p> <p>Allocation Type: Strategic Mixed-use Sustainable Urban Extension</p> <p>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</p> <p>Phasing Tranche Refer to trajectory 2018-2022: 0 2023-2027: 260 2028-2033: 587</p> <p>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.</p> <p><b>MASTERPLAN DEVELOPMENT PRINCIPLES</b> This development should <del>must</del> accord with the following principles, which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting</p>	<p>Proposed changes being sort to Policy PLA2.</p> <p>Proposed changes being sort to Policy PLA2.</p>	<p>Comments noted. However, Development Plans Manual Table 17: 'Site Allocations Policy Table' recommends that the total units in the plan period for each allocation should be clearly specified. Therefore, Policy PLA2 is considered appropriate in the current form.</p> <p>Comments noted, however, the Planning Inspectorate has advised that 'must' is appropriate terminology for Strategic and Development Management Policies. Therefore, the proposed changes to PLA2 are unsubstantiated and not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p>
---	---	---

<p>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:</p> <p>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;</p> <p>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;</p> <p>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 <del>must</del> 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;</p> <p>d) Pursue high quality, well-planned development in the vicinity of the overhead power lines, ensuring the land beneath and adjacent to the overhead line route is used to make a significant, positive contribution to the development's green infrastructure network. This should <del>must</del> be achieved by creating a linear park that incorporates landscaping areas, nature conservation and pedestrian linkages to</p>	<p>Proposed changes being sort to Policy PLA2.</p> <p>Proposed changes being sort to Policy PLA2.</p>	<p>Comments noted, however, the Planning Inspectorate has advised that 'must' is appropriate terminology for Strategic and Development Management Policies. Therefore, the proposed changes to PLA2 are unsubstantiated and not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p> <p>Comments noted, however, the Planning Inspectorate has advised that 'must' is appropriate terminology for Strategic and Development Management Policies. Therefore, the proposed changes to PLA2 are unsubstantiated and not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p>
---	---	---

<p>avoid the unnecessary sterilisation of land near the overhead lines;</p> <p>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;</p> <p>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;</p> <p>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.</p> <p><b>DEVELOPMENT REQUIREMENTS</b></p> <p>The development should <del>must</del> provide the following requirements:</p> <p>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 <del>sustainable clusters of no more than ten units as per the Council's requirements;</del></p>	<p>Proposed changes being sort to Policy PLA2.</p> <p>Proposed changes being sort to Policy PLA2.</p> <p>Proposed changes being sort to Policy PLA2.</p>	<p>The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p> <p>Comments noted, however, the Planning Inspectorate has advised that 'must' is appropriate terminology for Strategic and Development Management Policies. Therefore, the proposed changes to PLA2 are unsubstantiated and not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p> <p>Comments noted, however, the Planning Inspectorate has advised that 'must' is appropriate terminology for Strategic and Development Management Policies. Therefore, the proposed changes to PLA2 are unsubstantiated and not supported. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period. The representor's proposal to remove reference to clusters of ten affordable units is not supported. The rationale for this policy requirement is clearly set out in the Affordable Housing Background Paper and is consistent with Policy COM3. Delivery of affordable housing through sustainable clusters of no more than ten affordable units, interspersed throughout the respective developments, is considered fundamental to ensure delivery of balanced, mixed-tenure,</p>
--	--	--

	<p>2) 1 <del>1.84</del> 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;</p> <p>3) 4 hectares of land for the relocation of Heronsbridge Special Education Needs School;</p> <p>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;</p> <p>5) 4.3 hectares of land for leisure and ancillary commercial uses which could include a Community Indoor Tennis Centre;</p> <p>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;</p> <p>7) An <del>emergency</del> access through Bridgend Technology Park that <del>also promotes pedestrian and cycling connectivity</del> 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;</p> <p>8) Off-site highway improvements with regard to the requirements arising through</p>	<p>Proposed changes being sort to Policy PLA2.</p> <p>Proposed changes being sort to Policy PLA2.</p> <p>Proposed changes being sort to Policy PLA2.</p> <p>Proposed changes being</p>	<p>sustainable communities. Discrete clusters of more than 10 affordable units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities.</p> <p>Comments noted. However, the intention is to secure future land provision to accommodate future school expansion.</p> <p>The proposed change would incorporate a degree of flexibility into Policy PLA2 and will be incorporated into the submission version of the RLDP. Proposed change accepted.</p> <p>The proposed change adds clarity to the policy criteria and will be incorporated into the submission version of the RLDP. Recommendation: Proposed change accepted.</p> <p>Para 5.109 National planning policy (PPW) states the provision of adequate and efficient infrastructure to deliver the plan is essential. It is essential that strategic site policies reference the IDP and Transport Priority Schedule</p>
--	--	--	---

<p>assessment of the proposals at planning application stage from the Strategic Transport Assessment and as identified in the Transport Measures Priority Schedule; 49</p> <p>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;</p> <p>10) Retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or SemiAncient Woodland), and SINC;</p> <p>11) Submit and agree ecological management plans including proposals for mitigation, enhancement and maintenance for retained habitats and protected species (including for bats and</p>	<p>sort to Policy PLA2.</p> <p>Proposed changes being sort to Policy PLA2.</p>	<p>to ensure consistency with the Development Plans Manual that states 'LDPs should clearly indicate when proposals and allocations are expected to come forward, links to any required infrastructure, identify necessary infrastructure improvements and clearly state who will be responsible to fund such improvements at what point in the plan period to facilitate development'. Therefore, the Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p> <p>The Replacement LDP aims to reduce private car reliance and help the County Borough achieve the principles set out by the Active Travel (Wales) Act 2013, with the ultimate aim of improving and expanding upon the current active travel routes as identified in the Existing Route Maps.</p> <p>Bridgend County Borough Council has produced Active Travel Network Maps to identify the walking and cycling routes required to create fully integrated networks for walking and cycling to access work, education, services and facilities. The Council's Active Travel Network Maps set out detailed plans for a network of active travel routes and facilities in the County Borough over the next 15 years. Further information is contained in the Active Travel Network Maps which can be viewed on the Council's website. The Active Travel Network Maps aim to improve access to key services and facilities including town centres, employment sites, retail areas and transport hubs, improved access to education facilities such as schools and colleges and improvements to, and expansion of, the existing strategic cycle network in the County Borough.</p> <p>The routes and proposals shown on the Active Travel Network Maps are indicative alignments that may be subject to change as routes are further developed. Opportunities should be maximised to further improve upon these routes, providing walking connections which will allow integration between new developments and existing communities.</p> <p>Implementation of this policy will be facilitated through the development process. When considering development proposals, the design layout will be considered and priority will be given to the proposals that incorporate walking and cycling. A high quality design which makes a positive contribution to the distinctiveness of communities and places will be essential in ensuring walking and cycling is an attractive and popular option of travel. Developers should therefore ensure the key principles of design are employed to deliver active travel. Adherence to the Active Travel Act Design Guidance and other relevant guidance can aid in the delivery of standards of good practice.</p> <p>Consideration of active travel will be key during the master planning of strategic sites in the County Borough. Reference to the Active Routes detailed in Policy PLA2 in conjunction with Policy PLA12 should be considered essential in the delivery of any strategic site or any proposal, ensuring that development is contributing to the promotion of a sustainable and healthy lifestyle. The Policy is considered appropriate in its current form and is designed to ensure more certainty for all stakeholders during the Replacement LDP period.</p>
---	--	---

	<p>dormouse) and provide appropriate compensatory and replacement habitat;</p> <p>12) On and off-site measures including any appropriate upgrades to the clean water supply or public sewerage networks;</p> <p>13) A new on-site heat network in accordance with ENT10 subject to feasibility. If the delivery of a district-heat network is not feasible the sequential approach to identify low carbon heating technologies should be adopted in accordance with ENT10 ; and</p> <p>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.</p> <p><b>Changes sought: revisions to PLA2 wording as above.</b></p>	<p>Proposed changes being sort to Policy PLA2 (Criteria 13).</p>	<p>Heat Networks are a method of delivering heating and hot water to multiple buildings from a central heat source and, particularly in urban areas, can be the most effective way to provide low carbon heat. Heat networks can vary in size from a single block of flats, two buildings sharing a single heat source or wider areas of multiple buildings forming a District Heat Network.</p> <p>Domestic heating is a major contributor to Bridgend County Borough’s carbon emissions therefore decarbonising heat is critical to achieving a low carbon energy system and is a national and local challenge. Future Wales identifies Bridgend as a ‘Priority Area for District Heat Networks’ and requires planning authorities to identify opportunities for District Heat Networks and plan positively for their implementation. The Bridgend Local Area Energy Strategy and Renewable Energy Assessment identifies those areas considered to be suitable for development for district heat, hybrid and electric-heating solutions in combination with different levels of targeted fabric retrofit as shown in Figure 3 below.</p> <p>The Bridgend Renewable Energy Assessment identifies the most appropriate low carbon heating solution for the LDPs Strategic Sites (refer to PLA1-5). As part of the Council’s holistic approach to the decarbonisation of heat, ENT10 seeks to ensure that low carbon heating technologies are installed as part of all new major development (heat networks below this threshold will also be encouraged). This policy will also help ensure that development is designed in such a way to not prejudice the future development of a potentially Countywide District Heating Network, and enable development to connect to it at a later date once it becomes operational. The precise alignment of the Network will only be finalised following detailed ground investigations and feasibility assessments. Developers are encouraged to discuss the alignment with the Council at an early stage to ascertain whether their proposals are likely to be affected. Proposed developments must demonstrate how the proposal will facilitate a connection to a District Heating Network, or robustly justify why the connection is not technically and/or economically viable and suggest an alternative approach. This robust policy position is justified on the basis of development longevity. Schemes should be able to demonstrate that they are suitable for a net-zero carbon energy system, otherwise costly retrofits will be required in the future to ensure that carbon targets are met.</p> <p>All policies are inter-related in their nature and need to be read in conjunction with one another in order to gain an understanding of the overall policy direction of the Replacement LDP, therefore, the proposed change is considered unnecessary because Policy ENT10 clearly outlines a sequential approach that requires new major development to demonstrate sustainable heating and cooling systems have been selected in the first instance, where technically feasible and financially viable. Criteria 13 is considered appropriate in its current form.</p>
425	<p>COM1(1) Parc Afon Ewenni Parc Afon Ewenni is proposed to be allocated for 675 homes and to be delivered in Years 6-15 of the plan period. As with Porthcawl Waterfront, Parc Afon Ewenni is a LDP ‘rollover’ allocation. Paragraph 4.2.10 of PPW states that “The supply of land to meet the housing requirement proposed in</p>	<p>Objection SP2(1) and COM1(1): overreliance of the Porthcawl Waterfront Site and Parc Afon Ewenni to deliver</p>	<p>Two existing large scale brownfield regeneration sites were initially proposed for re-allocation (Parc Afon Ewenni and Porthcawl Waterfront) within the Replacement LDP, both of which are considered deliverable components of housing supply to enable delivery of the housing requirement. Before being ‘rolled forward’ into the Deposit Plan, both sites were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. In the case of Porthcawl Waterfront, there has been a substantial change in circumstances to demonstrate the sites can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment).</p>

<p>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 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.</p> <p><b>Land West of Bridgend</b> A Strategic Site is proposed for allocation at Land West of Bridgend under Policy SP2(3).</p> <p>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 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 identified as a Sustainable Growth Area (as defined by SP1). Insufficient</p>	<p>the plans housing requirement.</p> <p>Objection: Land west of Tondu Road (Candidate Site Ref: 286.C2) should be allocated for mixed-use residential development.</p>	<p>For Parc Afon Ewenni, 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.</p> <p>For 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. As such, the representor's objection to Porthcawl Waterfront is considered unsubstantiated and is not supported.</p> <p>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 Porthcawl Waterfront are not supported.</p> <p>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 Land west of Tondu Road (Candidate Site Ref: 286.C2) specifically, the Assessment states,</p> <p><i>'The candidate site is located on the periphery of Bridgend, which is identified as a Sustainable Growth Area (as defined by SP1). Insufficient 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'.</i></p> <p>The Development Plans Manual advises that detailed evidence should be provided upfront and early in the plan making process to inform the delivery of the preferred strategy and subsequent plan stages. A greater depth of evidence at the candidate site stage is essential. Where inadequate evidence is provided upfront this leads to further evidence being sought later in the process, incurring time delays. An inadequate level of information to demonstrate delivery can be a reason for discounting sites.</p> <p>No comprehensive viability assessment was provided for Land west of Tondu Road (Candidate Site Ref: 286.C2). The Council wrote to all Stage 2 Candidate Site promoters on 21<sup>st</sup> August 2020 to remind site promoters</p>
---	---	---



<p>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.”</p> <p>This reasoning is wholly disputed and responded to below:</p> <ul style="list-style-type: none"> <li>• We accept that the site is identified as being located within a Sustainable Growth Area. This lends support to the site’s allocation;</li> <li>• 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</li> <li>• 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 demonstrates that the site</li> </ul>		<p>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) is viable or deliverable. As such, the representor’s statement does not justify allocation of Land west of Tondu Road (Candidate Site Ref: 286.C2).</p> <p>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.</p> <p>Whilst the Council notes the representor’s objection to this conclusion, the proposal is not supported for the reasons outlined.</p>
---	--	--

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.

- A significant number of homes with 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;
- The delivery of affordable homes;
- A Local Centre with provision for retail uses and other supporting neighbourhood facilities;
- Development of educational and supporting community facilities adjacent to Ysgol Gyfun Bryntirion;
- New access points including onto 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);
- A strong, sensitive and high-quality green infrastructure network that maintains and improves biodiversity in the area as well as

- maintaining much of the existing planting, hedgerows and trees; and
- 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 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 Bryntirion. This is already connected to the site via a bridleway forming part of the Bridgend Circular Walk.

Land west of Tondu Road (Candidate Site Ref: 286.C2) should accordingly be allocated within the LDP in order to contribute to its soundness.

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.		
391	<p><b>Land at Castle Meadows, Coity (ref. 323.C1)</b></p> <p>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</p> <p>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.</p> <p>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</p>	<p>Allocate Castle Meadows, Coity and object to Crag y Parcau, Bridgend</p>	<p>Identification of appropriate proposed allocations 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. For Castle Meadows, Coity, the Candidate Site Assessment concluded:</p> <p>“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. The site will not therefore be allocated for development in the Replacement LDP”.</p> <p>Conversely, for Craig y Parcau, Bridgend, the Candidate Site Assessment concluded:</p> <p>The candidate site is located on the periphery on Bridgend which is identified as a Sustainable 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. As such this site is allocated for residential development in the Replacement LDP.</p> <p>As such, the representor's proposals are not supported.</p>

<p>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.</p> <p>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 masterplan for future development of the site, the fact that it straddles the boundary of the designated area is not concluded to represent a significant constraint.</p> <p>According to the Candidate Site Assessment Report the site has not been included in the Deposit Draft LDP, and therefore is not proposed to be allocated for the following reason:</p> <p><i>“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.</i></p> <p><i>The site will not therefore be allocated for development in the Deposit Plan.”</i></p> <p>Based on the assessment undertaken by Vectos, 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, there are only two allocations in the Bridgend area identified for housing. One being COM1(1) Parc Ewenni and the other COM1(2) Craig Y Parcau. Whilst the Parc Ewenni site has been proposed for</p>		
--	--	--

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

<p>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.</p> <p>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:</p> <p>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.</p> <p>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</p>		
--	--	--

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



<p>roundabout, where extensive work by BCBC has provided a segregated route to Pencoed via the A473.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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 which are set out below:</p> <ul style="list-style-type: none"><li>• SOBJ1: To Create High Quality Sustainable Places (Placemaking)</li></ul>		
---	--	--

- 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 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 biodiversity are all significant 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 or 3-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
- • Takeaways
- • 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

	<p>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.</p>		
--	--	--	--

Title: Do you have any comments to make on the Deposit Replacement LDP?			
ID	Comment	Summary of changes being sought/proposed	Council response
82	<p>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 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</p>	<p>Proposal for several non-strategic edge of settlement housing allocations</p>	<p>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.</p> <p>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.</p> <p>In terms of the proposal to place a greater reliance on small to medium sized greenfield sites, several sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infrastructure problems and it is 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</p>

	<p>development unviable. Delivering no development will certainly not meet placemaking objectives.</p> <p>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 can lead to developments dominated by car parking.</p> <p>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.</p>	<p>Challenge PLA11 for not being in accordance with the transport hierarchy</p> <p>Reduce Outdoor Sport and Recreation Facilities Requirements (COM10)</p>	<p>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.</p> <p>PLA11 is a Development Management Policy that supports delivery of SP5: Sustainable Transport and Accessibility. The first criterion within proposed SP5 is for development to accord with the sustainable transport hierarchy for planning, which is consistent with Planning Policy Wales. PLA 11's supporting paragraph 5.2.76 further recognises that "the availability of parking spaces and parking charges applied, are key tools in facilitating a reduction in journeys by private car and encouraging a change in mode choice towards more sustainable means of travel". Further local guidance will be provided in a revised future Parking Standards SPG.</p> <p>All new housing developments will be expected to include an appropriate level of outdoor recreation for public amenity purposes in the interest of Good Design. This is an integral means of delivering several Local Wellbeing Objectives, including to reduce social and economic inequalities and ensure healthy choice in a healthy environment. Contrary to the representor's conclusion, COM10 is based on Fields in Trust recommended benchmark guidelines and allotment standards endorsed by the National Society of Allotment and Leisure Gardeners. The standards detailed within COM10 are not intended to represent minimum provision on all developments and the nature of contribution will be assessed on individual merits. As stated within COM10 itself, "provision of a satisfactory standard of outdoor recreation space is required on all new housing developments" and "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". On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG. As such, the proposal to reduce the benchmark guidelines, below those recommended by Fields in Trust, is not supported.</p>
1366	<p><i>Policy SP6: Sustainable Housing Strategy</i> 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.</p> <p><i>Policy COM1: Housing Allocations</i> 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.</p>	<p>To set a minimum housing requirement of 7,575 homes</p> <p>None – support Land West of Bridgend as a Strategic Allocation</p>	<p>The rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper and the support for the Growth Strategy is noted. 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. 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. As such, the total level of housing provision within the Deposit Plan is set appropriately to ensure delivery of the housing requirement. 7,575 homes is indeed the housing requirement.</p> <p>Comments noted.</p>



	<p>It further reflects the Sustainable Housing Strategy in Policy SP6.</p> <p><i>Policy COM3: On-site Affordable Housing</i> 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.</p> <p><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.</p>	<p>None – support area-wide and site-specific affordable housing policies.</p> <p>None further to the above.</p>	<p>Comments noted.</p> <p>Comments noted.</p>
717	<p>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!</p>	<p>Lack of awareness regarding consultation</p>	<p>As part of Stage 4 of the Delivery Agreement, the Council was required to undertake Deposit public consultation for a statutory period of 6 weeks, however the Council made an allowance for 8 weeks in order to maximise public participation. This was to ensure a range of views could be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. A number of consultation methods were used to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods included:</p> <ul style="list-style-type: none"> <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 Bridgend County Borough Council's Website (<a href="http://www.bridgend.gov.uk/ldpconsultation">www.bridgend.gov.uk/ldpconsultation</a>). Respondents were able to complete an electronic survey online to make a formal representation.</li> <li>• Printed reference copies were placed within public facing Council buildings, including every library in the County Borough (fixed and mobile), subject to social distancing guidelines. The reference copies were also available to view at the Council's Civic Offices in Angel Street, Bridgend, although by appointment only as the offices had not re-opened to the public due to the pandemic. Hard copies of the survey form were also been made available at these locations for members of the public to complete by hand.</li> <li>• Dissemination of hard copies of information to individuals. Members of the public were able request a copy of the survey by post to complete by hand (free of charge). There was a £25 charge for a hard copy of the whole Deposit Plan to cover printing and postage costs for such a large document.</li> <li>• Every individual and organisation on the LDP Consultation Database was notified by letter or email (depending on their preference) to inform them of the availability of the Deposit Consultation. Approximately 500 representors were contacted, provided with details of how to access the package of</li> </ul>

			<p>consultation documents and how to respond. As the consultation progressed, additional representors were been informed of and added to the database upon request.</p> <ul style="list-style-type: none"> <li>• Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in Bridgend County Borough.</li> <li>• 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.</li> <li>• Planning Officers have presented the consultation remotely to established working groups, including the 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 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.</li> </ul> <p>Posters were been sent to all Town and Community Councils to display</p>
488	It shouldn't go ahead unless public services are addressed ahead of any housing developments	Concerns regarding infrastructure	<p>Comments noted. An Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p>
511	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 spaces etc.	Concerns regarding proposed foodstore in Porthcawl	<p>Comments noted. In terms of the proposed foodstore, evidence confirms (See Appendix 16 – Retail Study) that the centre fulfils its function as a town centre and performs well against most indicators of vitality and viability. However, the centre has a limited convenience offer which is significantly below the UK average. Although the centre contains a range of smaller food stores suitable for top-up shopping, there is only one large supermarket suitable for main food shopping. This provides limited consumer choice and means that most residents must travel to other centres to meet their needs.</p> <p>Marketing for a new foodstore was carried out in autumn 2020 whereby numerous bids (five in total) were received and appraised. A robust selection process in which each bid was carefully assessed against a planning development brief resulted in Aldi Stores Ltd being identified as the preferred bidder. The planning development brief required bidders to submit high-quality, bespoke designs for premises that could act as 'gateway buildings' as well as incorporating appropriate access and active travel arrangements. The development brief for the food store site does not prescribe a particular architectural approach, but it does require clear attention to "place-making", taking in account the historic urban form and scale of the surrounding area. This will enable a development designed for human interaction and enjoyment whilst responding to and celebrating the maritime setting, cultural and heritage of Porthcawl. Cabinet members approved the disposal of the site to Aldi Stores Ltd, and delegated authority to officers to approve the terms of the disposal agreement.</p> <p>The food store site forms a key element of the wider masterplan that has been worked up for the Porthcawl Waterfront Regeneration Scheme and is intended to act as a precursor to, and catalyst for, future phases of development across the wider site. Subject to a planning application, the foodstore will be constructed alongside all-new residential, leisure, retail development at Salt Lake as well as new areas of green open space, bus terminus, active travel facilities and more.</p> <p>In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car par enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p>

			<p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans.</p>
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	<p>Members of the public were able to request a copy of the survey by post to complete by hand (free of charge). There was a £25 charge for a hard copy of the Deposit Plan to cover printing and postage costs. Printed reference copies were placed within Council buildings, including every library in the County Borough (fixed and mobile), subject to social distancing guidelines. The reference copies were also available to view at the Council's Civic Offices in Angel St, Bridgend, though by appointment only as the offices had not re-opened to the public. Hard copies of the survey form were also made available at these locations for members of the public to complete by hand.</p> <p>The plan itself including all background papers and technical evidence can be found online at: <a href="https://democratic.bridgend.gov.uk/ieListDocuments.aspx?CId=164&amp;MId=4059&amp;Ver=4&amp;LLL=0">https://democratic.bridgend.gov.uk/ieListDocuments.aspx?CId=164&amp;MId=4059&amp;Ver=4&amp;LLL=0</a></p>
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	<p>Comments noted. The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned by 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.</p> <p>Over 30% of the County Borough's population is projected to be aged 60+ by 2033. With absolute and relative growth across this age group, there is likely to be a broad reduction in local economic activity rates if the Plan does not facilitate sustainable levels of economic growth to offset this phenomenon. The Replacement LDP therefore seeks to deliver sustainable forms of growth that will attract and retain economically active households within the County Borough. As justified within the Strategic Growth Options Background Paper, the Regeneration and Sustainable Growth Strategy is largely driven by households within the 35-44 age group. This growth is projected to support an increase in people in workplace based employment over the Plan period, to be accommodated through provision of up to 7,500 additional jobs.</p> <p>A positive employment land response is necessary to achieve an equilibrium between new homes, a growing skilled labour force and job opportunities in order to stimulate the local to regional economy. The 2019 Economic Evidence Base Study (EEBS) (See Appendix 14) and 2021 Update (See Appendix 15) analysed this projected labour force boost alongside other employment trends including past take up of employment land and sector based economic forecasts. The resulting evidence base has informed the scale and distribution of employment need and the land best suited to meet that need over the plan period in the context of Planning Policy Wales and Technical Advice Note 23, justified further in the Employment Background Paper, and set out in SP11.</p>

	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 land, Policy ENT1 supports SP11 by allocating new employment land for development. Policy ENT2 supports SP11 by safeguarding the employment function of existing business and employment sites. This will enable a range of different sites to 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.	Concerns regarding Strategic Allocation PLA1: Porthcawl Waterfront / tourist facilities / parking	<p>Comments noted. With regards to leisure, an area north of the harbour within Salt Lake will be safeguarded for a leisure use, potentially a hotel. In the event that a hotel facility is not delivered then the site could provide an alternative form of leisure/tourism/commercial, year round, wet-weather attraction. Furthermore, the comprehensive enhancement of the Eastern Promenade with new buildings, facilities and better landscaping provides an exciting opportunity to create an area that will not only enhance the frontage but also act, with others, to set a quality benchmark which will also need to be achieved elsewhere.</p> <p>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 encouraged. This mix of uses will help bring life and vitality during the day and into the evening.</p> <p>Sandy Bay will accommodate public open space, residential, education provision and commercial. In terms of open space, Policy PLA1 requires development of Porthcawl Waterfront to incorporate Green Infrastructure and Outdoor Recreation Facilities of which are to be delivered in accordance with Policy COM10 and Outdoor Recreation Facilities and New Housing Development Supplementary Planning Guidance.</p> <p>Additionally, there are plans for creating new facilities at Cosy Corner, including community facilities whilst also creating employment opportunities. The plans for Cosy Corner include an all-new stone and glass-clad building which will feature new premises suitable for retail and start-up enterprises. The council also wants to create new meeting space for community use, a parade square for the Sea Cadets and an office for the harbour master as well as changing facilities for users of the nearby marina. If funding allows, plans are in place that will further enhance the scheme with new landscaping, public seating, a children's play area and a canopy structure capable of providing comfortable outdoor shelter from rain and the sun.</p> <p>In terms of car parking, it's acknowledged that a sound and robust parking strategy will be critical to the success of the regeneration. As part of the strategy, the site will accommodate a new multi storey car park on the existing Hillsboro car par enabling more ground floor space to be given over to public realm and development. Consideration should be given to alternative future uses as, overtime, the aspiration is that travel to Porthcawl Waterfront will be principally by public transport including park and ride schemes, greatly reducing the number of private vehicles requiring parking facilities. Consultations confirmed widespread support for the concept of a multi storey car park whilst recognising it will change the immediate outlook of properties on Hillsboro Place.</p> <p>The authority has a strong desire to facilitate and actively encourage a modal shift towards increased use of public transport and the provision of a new bus terminus is integral to this as well as being part of the wider Future Wales Plan. As such, a new 'bus terminus' may also be located along the Portway of which will function as a boulevard where visitors and locals could arrive at, and depart from the regeneration site and town centre. The location of the bus terminus will enable access towards the waterfront and also the town centre. The Council has also undertaken feasibility work to explore proposals to deliver a bus terminus within the Porthcawl regeneration area. The bus terminus project is being brought forward in connection with Cardiff Capital Region Metro Plus project and is seen as a key element of the wider regeneration plans. In terms of the proposed park and ride facility in Pyle, whilst it is not likely to be delivered in the short term due to the limits of the current City Deal funding programme, the scheme will remain a long term goal for the authority. However, funding will be invested into the proposed bus terminus.</p>

107 2	A fresh consultation with open and honest access should be communicated directly to all Porthcawl residents in a timely manner.	A fresh consultation with open and honest access should be communicated directly to all Porthcawl residents	<p>Comments noted. In terms of consultation, it is the view of the Council that the overall objectives of the Community Involvement Scheme (CIS) as originally set out in with the approved Delivery Agreement, including the CIS have been met. It is also considered that the LDP has been prepared in accordance with the LDP 'Preparation Requirements' set out in the Development Plans Manual (Edition 3).</p> <p>The Council previously consulted the public on the Preferred Strategy of which was held from 30th September to 8th November 2019. Following the public consultation period the Council was required to consider all representations made in accordance with LDP Regulation 16(2) before determining the content of the deposit LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 – Preferred Strategy &amp; Initial Consultation Report) for publishing. This report was subsequently signed off by members of Council.</p> <p>As part of Stage 4 of the Delivery Agreement, the Council was required to undertake Deposit public consultation for a statutory period of 6 weeks, however the Council made an allowance for 8 weeks in order to maximise public participation. This was to ensure a range of views could be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. A number of consultation methods were used to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods included:</p> <ul style="list-style-type: none"> <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 Bridgend County Borough Council's Website (<a href="http://www.bridgend.gov.uk/ldpconsultation">www.bridgend.gov.uk/ldpconsultation</a>). Respondents were able to complete an electronic survey online to make a formal representation.</li> <li>• Printed reference copies were placed within public facing Council buildings, including every library in the County Borough (fixed and mobile), subject to social distancing guidelines. The reference copies were also available to view at the Council's Civic Offices in Angel Street, Bridgend, although by appointment only as the offices had not re-opened to the public due to the pandemic. Hard copies of the survey form were also been made available at these locations for members of the public to complete by hand.</li> <li>• Dissemination of hard copies of information to individuals. Members of the public were able request a copy of the survey by post to complete by hand (free of charge). There was a £25 charge for a hard copy of the whole Deposit Plan to cover printing and postage costs for such a large document.</li> <li>• Every individual and organisation on the LDP Consultation Database was notified by letter or email (depending on their preference) to inform them of the availability of the Deposit Consultation. 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.</li> <li>• Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in Bridgend County Borough.</li> <li>• 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.</li> <li>• Planning Officers have presented the consultation remotely to established working groups, including the 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 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 <a href="mailto:ldp@bridgend.gov.uk">ldp@bridgend.gov.uk</a> or telephoning 01656 643633.</li> <li>• Posters were sent to all Town and Community Councils to display on their notice boards.</li> </ul>
----------	---	---	---

			Proposals for the Porthcawl Waterfront Regeneration site are currently being developed further as part of a 'Placemaking Strategy' that represents a form of sub area masterplanning supported by illustrative design material. This will provide a coherent basis for guiding development, securing future funding, attracting investors and delivering a comprehensive range of regeneration projects. In addition, any future development proposals for this site will be subject to a formal planning application where you can also have your say.
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 urban 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 to determine whether they conformed with the Preferred Strategy and, if so, whether they were deliverable. Sites measuring less than 0.25 hectares (including 329.C1) are too small for individual allocation and were therefore assessed through the Settlement Boundary Review (See Appendix 38). The Council has reviewed all settlement boundaries within the County Borough to determine if they are still appropriate in light of the Replacement LDP Strategy and / or would constitute appropriate amendments to existing boundaries. This included candidate site 329.C1 (rear of Osborne Terrace, Nantymoel). As detailed within the Review, the Replacement LDP Strategy does not identify Nantymoel as a location for strategic growth. Candidate site 329.C1 was considered to represent an inappropriate extension to the existing settlement of Nantymoel into the open countryside. Therefore, following the Review, the Deposit Replacement LDP has not proposed altering the defined settlement boundary of Nantymoel to include this site.
614	I hereby object to the above proposal and 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	Concerns relating to loss of green space, infrastructure, school's capacity, traffic, air quality, the historic environment and employment.	<p>The Deposit Plan has been prepared in accordance with Welsh Government Development Plans Manual (Edition 3). It contains guidance on how to prepare, monitor and revise a development plan, underpinned by robust evidence to ensure that plans are effective and deliverable and contribute to placemaking, as defined in national policy set out in Planning Policy Wales (PPW).</p> <p>The Deposit Plan has been underpinned by 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</p>

<p>“affordable” housing would be beyond the means of most young persons. • Infrastructure is not in place to support further development. The local comprehensive school, for example, has not yet caught up with the housebuilding of the previous decade. The viability of further expansion of Bryntirion Comprehensive School is very doubtful due to road access constraints. Section 106 contributions from a developer would therefore be futile for this purpose. Sending children from the proposed site to other comprehensive schools would violate the local place making principles stated in the draft LDP. Other aspects of infrastructure including sewerage, drainage, NHS services, etc. have not been anywhere nearly adequately addressed. • 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. • 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. This development would inevitably lead to further traffic driving through the village of Laleston to access the A48 and thereby the M4. • 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. The overall effect would be the urbanisation of the entire district. Urbanisation would violate the council’s objective of maintaining and enhancing the natural resources and biodiversity of the county borough. • 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. Llangewydd Road and its surrounding lane network have been identified by historians as a pre-historic ridgeway, a medieval pilgrims’ way, Ffordd y Gyfraith (“The Way of the Law”), and a</p>	<p>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.</p> <p>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. 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.</p> <p>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 sustainable growth will be appropriately directed towards the Main Settlements of Bridgend and Pencoed along with the grouped Main Settlement of Pyle, Kenfig Hill and North Cornelly.</p> <p>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, only those sites deemed appropriate were included for allocation in the Deposit Plan. As such, candidate site 308.C1 Bridgend (West of) was considered appropriate for allocation.</p> <p>As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (See Deposit Policy PLA3 – Page 71). The provision of new residential dwellings, including affordable units, will be incorporated alongside a new one and a half form entry Primary School, recreation facilities, public open space, plus appropriate community facilities all set within distinct character areas.</p> <p>Policy PLA3 will ensure development positively integrate 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. Development must also incorporate the Laleston Trail within the central part of the site, providing access to the Bridgend Circular Walk and realigned Public Right of Way. Furthermore, the enclosed byway with the existing hedgerow corridor will be retained as the Y Berth cross link. In terms of active travel, Policy PLA3 requires 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 A473, with Bryntirion Comprehensive School and Bridgend Town Centre (including the bus station and train station). New connections will be provided to accord with the proposed routes within the Council’s ATNM: INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58, INM-BR-127 and 2120.</p>
--	--

<p>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 towards Pyle in the 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</p>	<p>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).</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
---	---



<p>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 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.</p>		<p>While there is a small amount of evidence for late prehistoric and Roman activity in the surrounding 1km study area, the potential for archaeology of these periods within the site is deemed low. Post-medieval settlement was focused elsewhere in the locality and any archaeology of this period within the site is most likely to relate to agriculture. Overall, the baseline data indicate that the probability of significant archaeology being present is low. Any further archaeological investigation can reasonably be secured through an appropriately worded planning condition appended to a planning permission.</p> <p>Potential impacts upon the setting of historic assets in the locality have focused on the 1km study area. No significant effects arising from changes to setting have been identified for scheduled monuments, listed buildings and registered parks and gardens. In respect of the Laleston Conservation Area, there will also not be any significant changes to its visual setting. It is acknowledged that development in the southern part of the Site will remove a part of the agricultural landscape around Laleston which forms a buffer from Bryntirion to the east. However, agricultural land will remain on all sides around Laleston, which will retain its character as a discrete settlement, while landscaping measures associated with the development will mitigate any impression of coalescence. This is assessed as an impact of a minor order, with the special interest of the conservation area being retained. Policy PLA3 will require development to maintain a strategic green corridor between the site and Laleston to retain the separate identities and character of these settlements whilst preventing coalescence.</p> <p>The site promoter also commissioned EDP to undertake a Landscape and Visual Appraisal (LVA). The purpose of the appraisal was firstly to inform the design evolution of the scheme which enabled an integrated approach to potential landscape and visual opportunities and constraints.</p> <p>The LVA outlines that there are adverse and beneficial landscape effects resulting from development of this site. However, the embedded mitigation and the approach to design is considered to minimise adverse effects over time as the proposed landscape establishes and overall the predicted effects are not considered unacceptable from a landscape and visual perspective in the context of the delivery of a strategic housing site.</p> <p>The appraisal included a review of national and local policy, landscape character and visual amenity. The appraisal included assessment of the National Landscape Character Assessment (NLCA), LANDMAP, and Landscape Character Assessment for Bridgend County Borough (LCABC) (2013) in addition to an on-site assessment. The appraisal confirms 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 design appraised responds sensitively to assets on site such as the Bridgend Circular Walk, the byway, the hedgerow network and vegetated site boundaries. As such the proposals put forward at this stage are considered to be a thoughtful and easily assimilated future development of this site.</p> <p>Mitigation measures include:</p> <ul style="list-style-type: none"> <li>• The Laleston Meadows SINC would be brought into regular long-term management. This would protect the visual amenity and landscape character of this northern part of the site. A landscape buffer would set development back from the SINC, and dwellings would front onto it. The SINC could be used as a mitigation receptor site (in ecological terms) and the grazed fields currently within the SINC could be improved by the proposals as well as maintained in the long term. The SINC offers a great opportunity for informal and natural play on site provided increased public access would not clash with its ecological function;</li> <li>• The site contains very few of the key characteristics listed in the published documents on Laleston SLA. The site has a strong network of hedgerows, some which would be lost and the field pattern replaced by</li> </ul>
---	--	--

			<p>urban form. However, the retained hedgerows and trees would be protected by landscape buffers and some of the character of the SLA within which the site lies would be retained;</p> <ul style="list-style-type: none"><li>• Provision of structural landscaping, a mix of native and non-native trees and shrubs proposed throughout the site for biosecurity, diversity of ecosystems and habitat creation as well as the visual amenity of future residents. Areas of open space would be bolstered by considered structural planting to create an aesthetically pleasing urban development which is well integrated with the proposed landscape strategy 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 the emerging proposals as it forms a desirable strong green framework that links with the wider green infrastructure to the north, west and south of the site;</li><li>• Adequate replacement planting of local species in appropriate locations to compensate for any loss of trees and hedgerows, and enhancement planting; and</li><li>• The location of public open space, public footpaths and the street-alignment has been designed to protect and reflect local character.</li></ul> <p>Through consideration of the findings above, it is anticipated that any notable landscape and visual effects resulting from the addition of the proposed scheme would be localised in extent and contained within a c.400m radius of the site, despite the site's relatively open character.</p> <p>Overall it is 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.</p> <p>Policy PLA3 will ensure that the design and layout of the site has regard to the landscape in which it sits, considering the interface between the site, Bridgend and Laleston. Visual impacts must be minimised through the inclusion of mitigation measures and provide links with the existing landscape and access features to safeguard landscape character whilst creating a sense of place. The development must also 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.</p> <p>In terms of biodiversity/ecology, an ecological desk study and Extended Phase 1 survey has been undertaken by EDP. The desk study has noted that within the Study Site's zone of influence there are a number of statutorily and non-statutory designated sites present, most notably Laleston Meadows SINC which overlaps with the site itself.</p> <p>Given the combination of designated sites, it is concluded that any future planning submission will need to consider the potential for direct and indirect impacts to arise upon qualifying features, including the Laleston Meadows SINC. However, it is inherent within the emerging masterplan that the Laleston Meadows SINC and its associated designated features will be retained. Furthermore, such retained features will be further protected from potential harm, damage and disturbance through the sensitive design of built development away from SINC boundaries and inclusion of suitable buffers.</p> <p>The desk study confirms that the inclusion of Laleston Meadows SINC within the Study's Site boundary will provide substantial potential for a balanced provision of areas of informal public open space and wildlife zones. When linked with proposed POS and play areas across the developable site this will provide a significant benefit to both visual and recreational amenity, conservation and biodiversity enhancement. In respect of the latter, the SINC provides a potential space to accommodate ecological mitigation and biodiversity enhancements and thus offset ecological impacts that may arise during the development of adjacent land.</p>
--	--	--	--

			<p>An Extended Phase 1 survey was undertaken in February 2020, supplemented by further roosting bat works in March 2020. 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. Habitats of greatest ecological importance 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 roosting bats surveys identified several trees with low to high potential to support a bat roost whilst onsite ponds have been considered for their potential to support great crested newt.</p> <p>The results of the desk study and Extended Phase 1 survey have influenced the masterplan which has sought to locate development across those habitats of predominantly limited ecological value whilst retaining boundary habitats as far as possible. Where retained, such features have been accommodated within proposed informal green space and sustainable transport links, which ultimately enhances connectivity throughout the Site and contributes to the wider green infrastructure resource.</p> <p>Where avoidance is not possible, however, and will result in the loss of internal field boundaries (albeit predominantly species-poor or defunct), the site is considered to be of sufficient size and extent to enable future development proposals to flexibly avoid and/or mitigate for any significant ecological constraints and compensate where necessary. This will be in addition to the sensitive positioning of built development away from retained boundary features to minimise damage.</p> <p>The report also highlights further detailed habitat and species surveys which are recommended to inform a planning application and ensure proposed mitigation is appropriate and proportional. These include a Dormouse survey, which was raised in comments received from NRW. Policy PLA3 will require the development to retain and provide suitable buffers to habitats, particularly hedgerows, trees (including Ancient and/or Semi-Ancient Woodland) and Laleston Meadows SINC, which includes the green space bordering the northern and north-western boundaries of the site. PLA3 will also require the developer to submit and agree ecological management plans including proposals for mitigation, enhancement and maintenance for retained habitats and protected species (including for bats and dormouse) and provide appropriate compensatory and replacement habitat.</p> <p>Policy PLA3 will require development to incorporate the Laleston Trail within the central part of the site, providing access to the Bridgend Circular Walk and realigned Public Right of Way. Additionally, PLA3 requires 4.1 hectares of retained green infrastructure and new areas of public open space across the site comprising seven key areas of formal open space (including 0.5ha of 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.</p> <p>In terms of supporting infrastructure, an Infrastructure Delivery Plan (IDP) has been produced (See Appendix 37). The IDP provides a single schedule of all necessary infrastructure without which the development of allocated sites for the anticipated quantum of proposed housing/employment uses within the plan period could not proceed. Such infrastructure includes transport, education, health, environmental management, utilities in addition to community and cultural infrastructure.</p> <p>With regards to education and comprehensive school provision, a contribution will be taken in accordance with the Education Facilities and Residential Development SPG and a decision will be made by the Local Education Authority as to how the sum will be utilised.</p> <p>In terms of sewerage, Dwr Cymru Welsh Water have confirmed that reinforcement works are required on both the clean and foul network to accommodate the site as a whole and a Hydraulic Modelling Assessment will be</p>
--	--	--	---

			<p>required to inform such works. They have also confirmed that there are no insurmountable obstacles to the delivery of the site.</p> <p>With respect of drainage, the site promoter has prepared a high-level drainage strategic of which confirms that the site is located with DAM Zone A, which is used within Technical Advice Note 15 to indicate that there is considered to be little to no risk of fluvial or tidal flooding at such a location. This reflected in comments received from NRW, and in the Strategic Flood Consequence Assessment (SCFA which informs the LDP and flags the site as green in its RAG assessment. As such, all proposed land uses are permitted without need for a flood consequence assessment. The SFCA does highlight that a small proportion of the site (4.9%) has a low risk of flooding due to surface water, which corresponds with topographic depressions running from north to south. There are two areas most at risk of surface water flooding. The first corresponds with a path of surface water flowing down into the north western corner of the site. This area of the site is currently comprised of woodland which is to be retained as part of the proposals. It is therefore considered that this area of surface water flood risk will have little influence on development proposals. The second area is a key surface water flow route that runs through the centre of the site towards the A473 where a small area of high surface water flood risk is shown. The surface water flow routes in this part of the site will be retained where possible and incorporated within the surface water drainage strategy through the use of SUDs and green corridors.</p> <p>A revised TAN15 is due to be implemented in June 2023. This will be supported by the new Flood Map for Planning, which includes climate change information to show how this will affect flood risk extents over the next century. It shows the potential extent of flooding assuming no defences are in place. A review of the new Flood Map for Planning shows the site to be located outside of any flood zone and is therefore considered at low or no risk of flooding.</p> <p>In terms of the impacts on primary healthcare provision, the Council has been engaging with Cwm Taf Morgannwg University Health Board from the outset of the Replacement LDP process. Early meetings were held to ensure the level and spatial distribution of growth proposed was clarified to help facilitate alignment of service provision. As part of Stage 3 of the Candidate Site Assessment, the health board amongst other consultation bodies were invited to provide comments in respect of those sites identified as suitable for future development and possible allocation in the Deposit LDP. Whilst the Council cannot ultimately control provision of primary healthcare services, close working relationships will continue and be maintained with Cwm Taf Morgannwg University Health Board. This will be key to service provision planning as site allocations within the Deposit Plan progress.</p> <p>The site promoter commissioned Air Quality Consultants to undertake an Air Quality Assessment to assess the impact of the proposed development and subsequent increased traffic emissions arising from the additional traffic on the Air Quality Management Area (AQMA) of Park Street. Concentrations have been modelled for a number of worst-case receptors, representing existing properties where impacts are expected to be greatest. In addition, the impacts of traffic emissions from local roads on the air quality for future residents on the proposed development have been assessed.</p> <p>The assessment has demonstrated that concentrations of PM10 and PM2.5 will remain below the objectives at all existing receptors in 2022, with or without the proposed development, and that all impacts for these pollutants will be negligible.</p> <p>In the case of annual mean nitrogen dioxide, concentrations will remain below the objective at all but one existing receptor (representative of 6-8 homes) in 2022, with or without the proposed development. However, it is now considered unlikely that any new homes within the development will be occupied before 2024, by which time it would be reasonable to expect concentrations at these 8 homes to be below the objective. The assessment has demonstrated that the impacts in terms of annual mean nitrogen dioxide concentrations of the full development</p>
--	--	--	--

			<p>traffic being on the roads in 2022 will be negligible everywhere other than at this one receptor, where the impact under this scenario would be moderate adverse. However, bearing in mind that no new homes will be occupied before 2024, and the development is unlikely to be complete and thus generating its full traffic volumes until the 2030s, this scenario is unrealistically worst-case. Applying professional judgement, it is considered most likely that the actual impact of the development at these 8 homes will also be negligible in all years from the first occupation in 2024.</p> <p>The effects of local traffic on the air quality for future residents living in the proposed development have been shown to be acceptable at the worst-case locations assessed, with concentrations being well below the air quality objectives. As such, the overall operational air quality effects of the development are judged to be 'not significant'</p> <p>The proposed allocation is supported by detailed masterplanning work, including an illustrative block plan to identify a realistic dwelling yield on the site's net developable area. The Transport Assessment reflects the number of dwellings the site is expected to deliver. This identifies the various transport issues relating to the proposed development, and, in combination with the Strategic Transport Assessment, what measures will be taken to deal with the anticipated transport impacts of the scheme. Proposed Policy PLA3 prescribes the appropriate development requirements in relation to all forms of travel. For the avoidance of any doubt, this number of dwellings does not require the original proposed site boundary to be expanded, rather more efficient use of the existing net developable area. The density and mix of uses proposed is considered appropriate to support a diverse community and vibrant public realm, whilst generating a critical mass of people to support services such as public transport, local shops and schools. In accordance with national planning policy, higher densities should be encouraged in urban centres and near major public transport nodes or interchanges. Given the site's location within the Primary Key Settlement of the County Borough and the proximity to Bridgend Town Centre, this density level is therefore considered appropriate to foster sustainable communities, further bolstered by the proposed enhancements to the active travel network.</p> <p>The Replacement LDP aims to reduce private car reliance and help the County Borough achieve the principles set out by the Active Travel (Wales) Act 2013, with the ultimate aim of improving and expanding upon the current active travel routes as identified in the Existing Route Maps. Consideration of active travel has been key during the master planning of strategic sites in the County Borough. Reference to the Active Routes detailed in Policy PLA3 in conjunction with Policy PLA12 should be considered essential in the delivery of any strategic site or any proposal, ensuring that development is contributing to the promotion of a sustainable and healthy lifestyle.</p> <p>The Active Travel Network Maps aim to improve access to key services and facilities including town centres, employment sites, retail areas and transport hubs, improved access to education facilities such as schools and colleges and improvements to, and expansion of, the existing strategic cycle network in the County Borough. Opportunities will be maximised to further improve upon these routes, providing walking connections which will allow integration between new developments and existing communities.</p> <p>Whilst developments should be encouraged in locations which reduce the need to travel and promote the use of sustainable transport, the Council recognises that any development growth will likely result in greater travel demand, and that increased traffic levels and congestion is likely to occur if appropriate mitigating transport measures and infrastructure are not delivered. Therefore a Strategic Transport Assessment (See Appendix 36) has been undertaken to consider the impact of plan proposals and help guide and inform the process of delivering land allocations by means of modelling and quantifying the transport impact of these proposals. The technical notes accompanying this assessment demonstrate that the proposed level of development detailed within the LDP can be accommodated within the BCBC Highway Network with suitable mitigation.</p> <p>Furthermore Strategic Policy 5: Sustainable Transport and Accessibility will ensure that development must be located and designed in a way that minimises the need to travel, reduces dependency on the private car and</p>
--	--	--	--

			<p>enables sustainable access to employment, education, local services and community facilities. Development will be required to deliver, or contribute towards the provision of, active travel scheme, public transport measures, road infrastructure, and other transport measures, in accordance with the Bridgend Local Transport Plan and the Bridgend Integrated Network Plan (See Appendix 29).</p> <p>Proposed Policy PLA3 prescribes a number of placemaking principles for Land West of Bridgend, which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. Such requirements include pursuing 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. There will be a clear emphasis on providing safe pedestrian and cycling linkages along the A473, with Bryntirion Comprehensive School and Bridgend Town Centre (including the bus station and train station). New connections will be provided to accord with the proposed routes within the Council's ATNM: INM-BR-52, INM-BR-55, INM-BR-57, INM-BR-58, INM-BR-127 and 2120.</p> <p>Policy PLA3 will require on-site highway improvements to ensure the principal point of vehicular access is achieved from a new signalised junction with the A473 at the southern boundary; the junction will accommodate a new-shared use crossing to connect the internal cycleway/footway with the existing active route BRC9b on the southern side of the A473.</p> <p>The site promoter's Transport Assessment confirms that the traffic effect of 850 dwellings is forecast to be in the order of 269 and 243 two-way movements in the AM and PM peak hours respectively, although this is considered worst case as attitudinal change towards travel progresses. This quantum of trips equates to just over 4 vehicles per minute two-way, diluted across the local highway network. 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. Working from home and from a third-place such as a non-site Workhub will be encouraged from the outset, in line with Welsh Government's aspirations.</p> <p>Furthermore, the Council have prepared a Sustainability Appraisal (SA) to inform the Replacement LDP (See Appendix 9) of which was carried out to identify the likely significant environmental and wider sustainability effects from the Deposit Plan. It also considers whether any mitigation and enhancement measures should be incorporated within the Replacement LDP to ensure the avoidance of likely significant adverse effects and to enhance the effectiveness of the plan. The findings of the SA indicate that the proposed development with its proposed range of land uses will likely produce a wide range of significant beneficial effects.</p>
1213	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, infrastructure, community uses, retail etc, so as to meet the needs of the future	Support for PLA3.	Support noted.

<p>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</p>		
--	--	--

	<p>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.</p>		
<p>121 5</p>	<p>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, 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 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</p>	<p>Support for PLA3.</p>	<p>Support noted.</p>



	<p>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. 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.</p>		
874	<p>We welcome the proposed Replacement 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).</p> <p>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.</p> <p>We look forward to engaging in the Development Plan process in a constructive</p>	None	Comments noted

	way as it progresses, and the Borough Council's consideration evolves.		
223	<p>Policy SP6: Sustainable Housing Strategy</p> <p>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.</p> <p>Policy COM1: Housing Allocations</p> <p>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.</p> <p>Policy COM3: On-site Affordable Housing</p> <p>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.</p>	<p>To set a minimum housing requirement of 7,575 homes</p> <p>None – support Land West of Bridgend as a Strategic Allocation</p> <p>None – support area-wide and site-specific affordable housing policies</p>	<p>The rationale for the Growth Strategy is detailed within the Strategic Growth Options Background Paper and the support for the Growth Strategy is noted. 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. 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. As such, the total level of housing provision within the Deposit Plan is set appropriately to ensure delivery of the housing requirement. 7,575 homes is indeed the housing requirement.</p> <p>Comments noted.</p> <p>Comments noted.</p>
610	I think I've made my point	No changes	Comments noted
720	<p>Re SF1: Settlement Hierarchy &amp; Urban Management</p> <p>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.</p>	<p>Amend the Settlement Boundary in Cefn Cribwr to incorporate the representor's land holding to the north of the former Dwr Cymru Reservoir Site</p>	<p>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 (See Appendix 19) has been undertaken to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables sustainable growth is proposed to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pencoed and within the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly'.</p> <p>The Settlement Assessment clearly identifies Cefn Cribwr as a Local Settlement and significant growth in this vicinity would not accord with this classification. Of particular relevance is the fact Cefn Cribwr is one of only a</p>

<p>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, the existing settlement boundary, and the disused reservoir site.</p> <p>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.</p> <p>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.</p>		<p>small number of settlements without an Active Travel route. Refer also to Background Paper 3: Spatial Strategy Options.</p> <p>Table 7 within the Deposit Plan (p.102) clearly identifies the level of growth attributable to Local Settlements outside of Growth Areas. This reflects the fact 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.</p> <p>The Candidate Site Assessment clearly states that Cefn Cribwr is identified as a 'Local Settlement' where new development should be contained within the existing settlement boundary. The area of land referenced by the representor was not submitted as a Candidate Site and is not supported by any background evidence to show it is deliverable. It is also located outside the existing settlement boundary and is therefore considered to represent an unacceptable incursion into the open countryside.</p> <p>A Settlement Boundary Review (2021) was also published alongside the Deposit Plan consultation documents. This study provides the background and justification for the review of the settlement development boundaries through the Replacement Local Development Plan (2018-2033). It includes a list of matters that have been considered when determining if and how an existing settlement boundary should be changed. It also includes maps and tables for the County Borough of Bridgend illustrating the proposed changes and explaining the reasons for them. This Study did not propose any changes to the existing settlement boundary of Cefn Cribw.</p> <p>As such, the representor's proposal to extend the Cefn Cribwr settlement boundary to include Land to the North of the disused reservoir is not supported.</p>
---	--	--

	<p>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.</p>		
722	<p>Re SF1: Settlement Hierarchy &amp; Urban Management</p> <p>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.</p> <p>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, the existing 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.</p>	<p>Amend the Settlement Boundary in Cefn Cribwr to incorporate the representor's land holding to the north of the former Dwr Cymru Reservoir Site</p>	<p>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 (See Appendix 19) has been undertaken to establish a sustainable settlement hierarchy. Based upon the consideration of a comprehensive range of variables sustainable growth is proposed to be appropriately directed towards the Settlements of Bridgend, Porthcawl, Pencoed and within the grouped Settlement of 'Pyle, Kenfig Hill and North Cornelly'.</p> <p>The Settlement Assessment clearly identifies Cefn Cribwr as a Local Settlement and significant growth in this vicinity would not accord with this classification. Of particular relevance is the fact Cefn Cribwr is one of only a small number of settlements without an Active Travel route. Refer also to Background Paper 3: Spatial Strategy Options.</p> <p>Table 7 within the Deposit Plan (p.102) clearly identifies the level of growth attributable to Local Settlements outside of Growth Areas. This reflects the fact 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.</p> <p>The Candidate Site Assessment clearly states that Cefn Cribwr is identified as a 'Local Settlement' where new development should be contained within the existing settlement boundary. The area of land referenced by the representor was not submitted as a Candidate Site and is not supported by any background evidence to show it is deliverable. It is also located outside the existing settlement boundary and is therefore considered to represent an unacceptable incursion into the open countryside.</p> <p>A Settlement Boundary Review (2021) was also published alongside the Deposit Plan consultation documents. This study provides the background and justification for the review of the settlement development boundaries through the Replacement Local Development Plan (2018-2033). It includes a list of matters that have been considered when determining if and how an existing settlement boundary should be changed. It also includes maps and tables for the County Borough of Bridgend illustrating the proposed changes and explaining the reasons for them. This Study did not propose any changes to the existing settlement boundary of Cefn Cribw.</p> <p>As such, the representor's proposal to extend the Cefn Cribwr settlement boundary to include Land to the North of the disused reservoir is not supported.</p>

	<p>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.</p>		
271	<p>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 council in the next weeks,</p> <p>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 l d p map and strategy has been presented for public inspection and consultation, please don't blame covid 19, to be able to put for public inspection and consultation l d p bridgend replacment local development plan -deposit draft statutory public consultation: 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 stragey provided by the planning depatment of the bridgend</p>	<p>Objects to consultation process / proposals map / removal of Green Wedges</p> <p>Objects to wording of paragraph 5.5.61 on page 201.</p>	<p>It is the view of the Council that the overall objectives of the Community Involvement Scheme (CIS) as originally set out in the approved Delivery Agreement (See Appendix 5), have been met. It is also considered that the LDP has been prepared in accordance with the LDP 'Preparation Requirements' set out in the Development Plans Manual (Edition 3).</p> <p>The Council previously consulted the public on the Preferred Strategy which was held from 30th September to 8th November 2019. Following the public consultation period, the Council was required to consider all representations made in accordance with LDP Regulation 16(2) before determining the content of the deposit LDP. As such the Council drafted an initial Consultation Report (See Appendix 8 – Preferred Strategy &amp; Initial Consultation Report) for publishing. This report was subsequently signed off by members of Council.</p> <p>As part of Stage 4 of the Delivery Agreement, the Council was required to undertake Deposit public consultation for a statutory period of 6 weeks, however the Council made an allowance for 8 weeks in order to maximise public participation. This was to ensure a range of views could be considered as part of a process of building a wide consensus on the Replacement LDP's strategy and policies. A number of consultation methods were used to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods included:</p> <ul style="list-style-type: none"> <li>• A Legal Notice was placed within the Glamorgan Gazette on 3rd June 2021</li> <li>• The package of consultation documents was made available online via Bridgend County Borough Council's Website. Respondents were able to complete an electronic survey online to make a formal representation.</li> <li>• Printed reference copies were placed within Council buildings, including every library in the County Borough (fixed and mobile), subject to social distancing guidelines. The reference copies were also available to view at the Council's Civic Offices, by appointment only as the offices had not re-opened to the public due to the pandemic. Hard copies of the survey form were also made available at these locations for members of the public to complete by hand.</li> <li>• Dissemination of hard copies of information to individuals. Members of the public were able to request a copy of the survey by post to complete by hand (free of charge). There was a £25 charge for a hard copy of the whole Deposit Plan to cover printing and postage costs for such a large document.</li> <li>• Every individual and organisation on the LDP Consultation Database was notified by letter or email to inform them of the availability of the Deposit Consultation. Approximately 500 representors were</li> </ul>

<p>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 consultation to happen the books of maps and strategy proposal must be shown by the bridgend county borough council to be transparent 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 l d p,</p> <p>the bridgend replacement local development is fundamentally flawed settlement boundaries are not correct on the l d p map, for any true consultation process to proceed for public consultation, the boundaries 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</p> <p>the map pages of the large and small scale communities 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,</p> <p>the colours of the land in the l d p map do not reflect the colours in the l 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 white land, this is misleading for consultees and the general public, white land has no</p>		<p>contacted, provided with details of how to access the package of consultation documents and how to respond. As the consultation progressed, additional representatives were informed of and added to the database upon request.</p> <ul style="list-style-type: none"><li>• Planning Aid Wales were commissioned by the Council to run remote engagement events for all Town and Community Councils in the County Borough.</li><li>• 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.</li><li>• Planning Officers have presented the consultation remotely to established working groups, including the Bridgend Community Cohesion and Equalities Forum and Youth Forum.</li><li>• In place of face-to-face public drop-in sessions, representatives were able to book one-to-one telephone appointments with planning officers to discuss any queries/concerns they may have had.</li><li>• Posters were sent to all Town and Community Councils to display on their notice boards.</li></ul> <p>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.</p> <p>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.</p> <p>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 site-search 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'.</p>
---	--	--

<p>protection from developers and the development of large scale sprawling housing developments in the open countryside in the bridgend county borough, the result will be the coalescence of the communities 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 pheasant 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 policy, the field must be given green land status enabling more protection from development before any transfer of a lease for the field can go ahead with the newcastle higher community council,</p> <p>(penyfai common land), penyfai common is a green buffer zone between the communities of penyfai and aberkenfig and is shown on the LDP 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</p> <p>the LDP map pages 20/ 21 land south of heol tynygar is penyfai common land and is shown as white land, commoners including myself have common rights, i own my commoners 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 tynygar, 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</p>	<p>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.</p> <p>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.</p> <p>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 &amp; COM9). In this regard, the status of the field has not changed from the existing LDP.</p> <p>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.</p> <p>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'.</p> <p>Paragraph 5.5.61 reads "...Planning permission will normally <b>"only"</b> 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.</p>
--	--

<p>county borough council,there is no ownership of any penyfai common land by the bridgend county borough council</p> <p>boundaries of the penyfai common land are not shown correctly on the local 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 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 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 l 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</p> <p>wood land types page 200</p> <p>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 l d p map which has been changed from the original green status, i do not agree and i am objecting to the status of the coed were lys woodland</p>		<p>Coed-y-wernlys woodland is outside the settlement boundary. 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’.</p> <p>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 Bridgend incorporating the Coed-y-wernlys woodland). 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.</p> <p>Woodlands are not specifically shown on the Deposit LDP Proposals Map. Land to the west of Penyfai is located outside of the settlement boundary. There is a presumption against development on land outside of the settlement boundary 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’.</p> <p>Land to the west of Penyfai is located outside of the settlement boundary. There is a presumption against development on land outside of the settlement boundary 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’.</p>
--	--	---



<p>being changed from green land to white land for development</p> <p>dpn 8: green infrastructure page 201</p> <p>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 developepment 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</p> <p>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 l 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 ,</p> <p>the l 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</p>		
--	--	--

	<p>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,</p>		
<p>103 8</p>	<p>Re SF1: Settlement Hierarchy &amp; Urban Management</p> <p>Proposed Amendment To The Coity Settlement Boundary</p> <p>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.</p> <p>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.</p> <p>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</p>	<p>Proposed amendment to the Coity Settlement Boundary</p>	<p>Comments noted.</p> <p>The Settlement Assessment Study (see Appendix 19) classifies Coity as being within the primary key settlement of Bridgend, which is defined as a Sustainable Growth Area in the Replacement LDP (See Policy SP1). However, the LDP proposals map shows the village of Coity to be outside of the Sustainable Growth Area due to its physical separation from the main settlement of Bridgend.</p> <p>A Settlement Boundary Review (see Appendix 38) was published alongside the Deposit Plan consultation documents. This study provides the background and justification for the review of the settlement development boundaries through the Replacement Local Development Plan (2018-2033). It includes a list of matters that have been considered when determining if and how an existing settlement boundary should be changed. It also includes maps and tables for the County Borough of Bridgend illustrating the proposed changes and explaining the reasons for them. This Study did not propose any changes to the existing settlement boundary within proximity of the site.</p> <p>The Settlement Boundary Review sets out a clear methodology for assessing proposed extensions to the settlement boundary. When measured against the 5 criteria considered in Stage 1 of the review, the representor's proposals fail to meet any of them. The land proposed to be included within the settlement boundary is a greenfield site that is visually, functionally and physically separated from the extent of the existing urban area. When assessed against the criteria included in Stage 2 of the review, the proposal falls to be considered as a change to the settlement development boundary that would allow for the allocation of a non-strategic edge of settlement allocation. However, in this context, when compared to 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. It is therefore considered to represent an unacceptable incursion into the open countryside; hence, the representor's proposal is not supported.</p>

	<p>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.</p> <p>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.</p> <p>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.</p>		
254	<p><b>Policy ENT8: Non A1, A2 and A3 Uses Outside of Primary Shopping Areas</b></p> <p>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</p>	<p>Query whether Policy ENT8 applies to Secondary Shopping Areas</p>	<p>It is acknowledged that the wording of Policies ENT7 and ENT8 could cause some confusion as to which criteria apply to development proposals in primary and secondary shopping areas and which apply to development proposals outside of primary and secondary shopping areas but within the boundaries of Retail and Commercial Centres. The policy wording will be amended ahead of submission of the Replacement LDP.</p>

	<p>A3 uses within Secondary Shopping Areas subject to meeting two criteria.</p> <p>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.</p> <p>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.</p> <p><b>Policy ENT9: Retail Development Outside of Retail and Commercial Centres</b></p> <p>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.</p>	<p>Policy ENT7 is more flexible than ENT8</p>	
400	<p>Policy COM3: On-site Affordable Housing</p> <p>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.</p>	<p>No changes proposed – support the plan-wide and site-specific affordable housing targets within Maesteg and the Llynfi Valley.</p>	<p>Comments noted.</p>

	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.	<p>The Plan-Wide Viability Assessment (2021) was prepared to determine the extent to which the LDP can contribute to the need identified for affordable housing across the County Borough over the plan period. The Assessment considered the broad levels of development viability across the County Borough’s seven Housing Market Areas as identified within the LHMA and was supplemented with site-specific viability testing for those sites key to delivery of the Plan. This process informed the contribution that sites (within different market areas) can make to the delivery of infrastructure, affordable housing and other policy requirements. As stated in the wording of Policy COM2 itself, planning applications that comply with this Policy will be assumed to be viable and it should not be necessary for viability issues to be considered further at planning application stage. This is due to the robustness of the evidence base. However, Policy COM2 does already contain a mechanism to re-evaluate affordable housing contributions in exceptional circumstances. The proposed policy wording states, “deviation from the affordable housing percentages specified will only be acceptable if the applicant can clearly demonstrate that particular exceptional circumstances justify the need for a viability assessment at the point of application. In such rare instances, the applicant must provide all information, evidence and justification to the Council on an ‘open book’ basis”. This proposed policy clearly contains a mechanism to deal with the potential issues cited by the representor on a site by site basis and is considered appropriate to deal with localised development economics over the plan period.</p> <p>As such, incorporating a monitoring mechanism to facilitate a wholesale change to the plan-wide affordable housing policy (in the event that house prices or material costs change) is not supported. Moreover, during Viability Steering Group Meetings, a number of Steering Group members advised against considering single viability components in isolation and stressed the need for any development viability re-appraisals to involve comprehensive re-consideration of all viability inputs. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. COM2, as worded, provides a mechanism to enable such nuances to be considered as part of a planning application in exceptional, site-specific circumstances. The proposed change is not supported.</p>

407	<p><b>COM10: Provision of Outdoor Recreation Facilities</b> 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.</p> <p>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.</p> <p>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:</p> <p>“Provision of a satisfactory standard of outdoor recreation space is required on all new housing developments, based on following standards:</p> <ol style="list-style-type: none"> <li>1) <del>1.2 hectares per 1,000 population for Playing Pitches;</del></li> <li>2) <del>1.6 hectares per 1,000 population for Other Outdoor Sports (non-pitch);</del></li> <li>3) <del>0.25 hectares per 1,000 population for Equipped/Designated Play Areas;</del></li> <li>4) <del>0.3 hectares per 1,000 population for Other Outdoor Provision;</del></li> <li>5) <del>0.2 hectares per 1,000 population for Allotment provision;</del></li> </ol> <p>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</p>	Proposed changes being sort to Policy COM10.	<p>All new housing developments will be expected to include an appropriate level of outdoor recreation for public amenity purposes in the interest of Good Design. This is an integral means of delivering several Local Wellbeing Objectives, including to reduce social and economic equalities and ensure healthy choice in a healthy environment. COM10 is based on Fields in Trust recommended benchmark guidelines and allotment standards endorsed by the National Society of Allotment and Leisure Gardeners. The standards detailed within COM10 are not intended to represent minimum provision on all developments. As stated within COM10 itself, “provision of a satisfactory standard of outdoor recreation space is required on all new housing developments” and “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”. On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG. As such, the proposal to alter COM10 and provide more flexibility to depart from standards recommended by Fields in Trust, is not supported.</p> <p>Policy COM10 is considered appropriate in its current form.</p>
-----	--	--	---

<p>outdoor recreation space. <del>On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG.</del></p> <p>Changes sought: revisions to wording of policy COM 10 as above.</p> <p>3 Para 10.2 Inspector's Report (valeofglamorgan.gov.uk) 21</p> <p><b>COM3: On-Site Provision of Affordable Housing</b></p> <p>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.</p> <p>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.</p> <p>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."</p> <p>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.</p> <p>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</p>	<p>Proposed changes being sort to Policy COM3.</p>	<p>The rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study. As outlined within the Development Plans Manual, "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. The two are not contradictory, rather the site specific being a refinement of the high level appraisal" (WG, 2020, para 5.89). Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council's aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within COM3.</p>
---	--	---





	<p>proportionate scale which serves the population that the development would be created.”</p> <p>Change sought: revise policy ENT9 as above.</p>		
425	<p>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.</p>	<p>Changes required to the plan to ensure its soundness</p>	<p>Comments noted. Please see responses addressed in the relevant themes/questions.</p>
133 5	<p>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.</p> <p>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.</p> <p>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</p>	<p>Objection: proposed changes to Policy PLA1 to exclude the Glamorgan Holiday Hotel.</p>	

<p>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.</p> <p>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.</p> <p>In its response to these representations at Paragraph 3.90 presented to the Council officers<sup>2</sup> 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.”</p> <p>At 3.97 the Council adds:</p> <p>“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</p>		
---	--	--

<p>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”</p> <p>The provision of detailed viability information on key sites in the development plan is an express requirement of the Development Plans Manual<sup>3</sup>. At paragraph 3.52 it states:</p> <p>“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.”</p> <p>This is reiterated at paragraph 5.89:</p> <p>“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.”</p> <p>It adds:</p> <p>“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</p>		
---	--	--

<p>to demonstrate they can be delivered through the consideration of more detailed costs, constraints and site specific requirements.”</p> <p>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.”</p> <p>While the Deposit Plan is supported by a high-level viability appraisal<sup>4</sup> , 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, re-routing of services and the substantial Section 106 obligations.</p> <p>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.</p> <p>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</p>		
--	--	--

<p>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.</p> <p>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.</p> <p>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.</p>		
--	--	--

<p>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.</p> <p><b>Placemaking Principles</b></p> <p>The representor’s comments on placemaking principles are confined to the detail in the supporting text of Policy PLA1.</p> <p>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.</p> <p>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.</p>		<p>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.</p> <p>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.</p> <p>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.</p> <p>Comments noted.</p>
--	--	--

