

# LDP Draft Review Report 2018



## Bridgend Local Development Plan 2006-2021



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# 1. Introduction

## Background

- 1.1 The Bridgend Local Development Plan (LDP) is a high level strategy which must be prepared by the Council. The current LDP (adopted on 18<sup>th</sup> September 2013) sets out in land-use terms the priorities and objectives of the Corporate Plan. A future Replacement LDP will be required to express in land-use terms, the wellbeing objectives and priorities of the Bridgend Public Services Board's Well-being Plan.

## Purpose of this Report

- 1.2 The Review Report sets out the proposed extent of likely changes to the existing LDP (2006-2021) and seeks to confirm the revision procedure to be followed in preparing a replacement LDP. It is proposed that the Replacement LDP will cover a plan period up to 2033, which is the end of a 15 year plan period that will commence in 2018.

## Executive Summary

- 1.3 The Bridgend Local Development Plan (LDP) was adopted by Bridgend County Borough Council on 18<sup>th</sup> September 2013 and sets out the Council's objectives for the development and use of land in Bridgend County Borough over the 15 year plan period 2006 to 2021, and its policies to implement them.
- 1.4 An up-to-date LDP is an essential part of a plan-led planning system in Wales. In order to ensure that there is a regular and comprehensive assessment of whether plans remain up-to-date the Council is statutorily required under Section 69 of the Planning and Compulsory Purchase Act 2004 to undertake a full review of the adopted LDP at intervals not longer than every 4 years from the date of adoption. As such, a full review of the adopted LDP was triggered in September 2017.
- 1.5 In accordance with statutory requirements, since its adoption, the LDP has been monitored on an annual basis with the publication of 3 Annual Monitoring Reports (AMRs). The AMR assesses the extent to which the LDP's strategy, policies and allocations are being delivered and how effective it has been in delivering the plan's overall vision and objectives.
- 1.6 Any revision to an LDP must be preceded by a Review Report which is a statutory part of the full LDP Review process, forming part of the documentation required at the future Pre-Deposit and Deposit stages of a revised LDP and will be submitted for consideration as part of the Replacement LDP's Examination process.
- 1.7 The primary functions of a Review Report are to determine the appropriate procedural route and key issues to be considered when taking the existing LDP forward.
- 1.8 In terms of 'procedural route', in the case of Bridgend, the plan is already the subject to a statutory required 4 year full review, and as such all aspects of the plan will need to be assessed to consider if they remain sound and fit for purpose. This will include the LDP vision, objectives, spatial strategy, policies and land-use allocations, broadly following the same preparation process and stages as the original plan.

- 1.9** The Review Report also considers whether the process of producing a replacement LDP should be undertaken on an individual basis or jointly with neighbouring Local Planning Authorities.
- 1.10** In terms of the role of the Review Report in identifying 'key issues' to be addressed in a replacement Plan, an integral part of this assessment are the findings of the preceding AMRs and consideration of the existing plans underlying evidence base (in terms of whether this needs to be replaced or updated). The Review Report also identifies other significant contextual changes in circumstances and policy context at a national, regional and local level, as these issues are also likely to inform and influence any potential changes and future direction of a Replacement Plan.

### **Contextual Changes**

- 1.11** The Replacement LDP will need to be updated to take account of a range of new Acts, Policy Frameworks, initiatives and evidence at a national, regional and local level.
- 1.12** The most significant in land-use terms in determining the future direction of the Replacement LDP will be evidence base changes associated with Welsh Government Population and Household projections, the work emanating from the National Development Framework (NDF) and regional work associated with the Strategic Development Plan (SDP) and Cardiff Capital Region City Deal, whilst ensuring that any changes and opportunities that this contextual evidence presents is compatible with the objectives of Bridgend's Wellbeing Plan.

### **Assessment of Likely Changes Required to the Current LDP**

- 1.13** The Regeneration-Led Spatial Strategy that underpins the LDP has been broadly successful, especially in bringing forward a number of residential and mixed-use allocated sites (primarily on brownfield land) within the County Borough. The delivery of sites has been especially successful within the Strategic Regeneration Growth Areas of Bridgend and the Valleys Gateway. The implementation of the LDP Strategy has however been less successful in the Strategic Regeneration Growth Areas of Maesteg and the Llynfi Valley and Porthcawl. This has largely been attributed to land-ownership issues and assembly and viability issues especially within the upper areas of the Llynfi Valley.
- 1.14** In terms of going forward with the LDP's existing Strategy, given that the majority of existing brownfield regeneration sites have been delivered or are committed (and expected to come forward within the next few years especially within Bridgend and the Valley's Gateway Growth Areas), it is likely that the existing Strategy will need to be reconsidered if it is to deliver future housing requirements for the County Borough up to 2033, especially given that the housing land supply within the County Borough has fallen below the 5 year minimum requirement. The Review Report therefore recognises an urgent need to address a shortfall in the housing land supply by the identification of additional housing sites.
- 1.15** Notwithstanding the need to identify new housing sites to address an identified shortfall, many other policies are performing effectively and are likely to require only minor amendments to reflect contextual changes and updates to national policy.

## **Review of the Evidence Base**

- 1.16** LDPs have to be based on robust evidence to ensure that critical land-use issues are identified and properly addressed. Some of the evidence base studies that underpin existing LDP policies are out-of-date and need to be updated and/or replaced in order to fully understand the land-use requirements of the County Borough up to 2033.
- 1.17** Some of the critical evidence base studies that will be required to support the Replacement plan are:-
- Population and household forecasts – to inform the LDP’s dwelling requirement up to 2033.
  - Local Housing Needs Assessment – to inform the housing requirement tenure type and size of dwelling to match future household type and age profile of the population.
  - Employment Land Review Update – to assess the future need of employment land suitable for all employment sectors and regional employment aspirations.
  - Retail Needs Assessment – to identify if there is a requirement for additional floorspace to help inform the Council’s approach to manage the vitality and viability of our town centres.
  - Renewable Energy – evidence to support carbon reduction targets and mitigate the effect of climate change.

## **LDP Review Options**

- 1.18** The Review Report makes the recommendation 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.
- 1.19** Stakeholders will make a valuable contribution in helping to identify and clarify what issues need to be considered, how effective the existing LDP has been in terms of delivery and the extent of likely changes required.
- 1.20** On this basis, it is proposed to undertake a ‘targeted’ consultation of the draft Review Report with key stakeholders. To assist in this process the draft Review Report is accompanied by a short questionnaire (see Appendix 2). It is proposed to undertake targeted consultation between 30th April 2018 and 25th May 2018.

## Structure of the Report

- 1.21** The Review Report is structured as follows:
- 1.22** **Section 2** details the key legislative, national and local policy changes that have occurred since the adoption of the LDP in 2013 which are important considerations to inform the review of the LDP and a summary of the main findings of the 2017 Annual Monitoring Report, taking into account the previous 3 AMR's and associated implications for review of the LDP.
- 1.23** **Section 3** provides an assessment of the current LDP and sets out the potential changes required in terms of the Vision and Objectives, Development Strategy, effectiveness of the current policy framework and the position on current allocations to inform the review process.
- 1.24** **Section 4** provides an analysis of the areas of evidence base that would need to be reviewed/ updated in preparing a revised LDP
- 1.25** **Section 5** considers the potential options for review of the LDP and opportunities for collaboration.
- 1.26** **Section 6** provides a conclusion on the appropriate form of plan revision.
- 1.27** **Section 7** sets out a summary of the key issues raised during the LDP (2013) Draft Review Report Public Consultation.

## **2. What issues have been considered in the LDP Review?**

### **2.1 LDP Annual Monitoring Report – Key Findings**

**2.1.1** In line with National Guidance set out in the Local Development Plan Manual the plan review should draw on, amongst other things, the findings of published AMR's. An overview of the LDP Monitoring Data for the third AMR period provides an interesting insight into the implementation of the LDP over the past 12 months. The key findings are set out below:

- a)** The 2017 JHLAS indicates that 406 new homes were completed during the monitoring period 1 April 2016 to 31 March 2017 and that 5046 dwellings have been completed in total during the LDP period 2006 to 2017;
- b)** The 2017 JHLAS indicates that the Council has a housing land supply, assessed against the housing requirement of the Bridgend LDP of 4.0 years;
- c)** To date 1160 affordable dwellings have been provided;
- d)** During the monitoring period 1 April 2016 to 31 March 2017 1.40 hectares of vacant employment land was developed;
- e)** Within Bridgend Town Centre of the 379 commercial properties surveyed 67 were vacant – representing a vacancy rate of 17.68 %;
- f)** Within Porthcawl Town Centre of the 204 commercial properties surveyed 10 were vacant – representing a vacancy rate of 4.90%;
- g)** Within Maesteg Town Centre of the 167 commercial properties surveyed 10 were vacant – representing a vacancy rate of 5.99% ;
- h)** The requirement as to whether the Council will need to identify a Gypsy and Traveller Site is now however determined by the new requirements of the Housing (Wales) Act 2014. The Housing (Wales) Act 2014 requires each local authority in Wales to undertake a Gypsy and Traveller Accommodation Assessment (GTAA) to ensure that needs are properly assessed and planned for. In summary, the GTAA covers the period 2016-2031 and estimates the additional pitch provision needed for Gypsies and Travellers in Bridgend. For the first 5 years of the GTAA plan period, there is no requirement for additional pitches and for the remainder of the GTAA plan period, a further 1 additional pitch is required. This gives a total need for the whole GTAA plan period of 1 additional pitch; and
- i)** The County Borough is making a significant contribution to national renewable energy targets. The generating capacity within an immediately adjacent the refined SSA (north of Evanstown) is 65 MW which is considerably higher than the estimated capacity within the SSA of 31 MW.

**2.1.2** The evidence collected as part of the AMR process indicates that the overall LDP strategy has been broadly successful, delivering many significant benefits for our communities. Most of the housing sites and associated infrastructure allocated in the LDP have been delivered on brownfield land with the exceptions of a few challenging brownfield sites that have stalled due to a combination of viability issues and, in some cases, land ownership issues. However, a number of key housing provision policy targets are not being met which

indicates that these policies are not functioning as intended. The 2017 JHLAS shows that the County Borough has housing land supply, assessed against the housing requirement of the Bridgend LDP, of 4.0 years. It is imperative that the Local Planning Authority progresses with the statutory review of the LDP which will address the shortfall in the housing land supply and facilitate the identification/allocation of additional housing land. The replacement LDP will assist in seeking to avoid 'planning by appeal' and ad hoc development coming forward outside the development plan system and not in accordance with the Plan's strategy.

## **Contextual Changes**

**2.2.1** As reported in the previous Annual Monitoring Reports there have been a number of new Acts in Wales, revisions to Planning Policy Wales, Technical Advice Notes and the publication of new or updated Welsh Government practice guidance that are relevant to the review of the LDP. The most significant of these to inform the review are set out below:

### **National Legislation and Policy**

**2.2.2** Planning (Wales) Act, 2015 - The Act gained Royal assent and became law on 6th July 2015. It sets out a series of legislative changes to deliver reform of the planning system in Wales, to ensure that it is fair, resilient and enables development. The Act addresses 5 key objectives including strengthening the plan led approach to planning with act introducing a legal basis for the preparation of a National Development Framework and Strategic Development Plan, discussed in further detail below.

**2.2.3** Welsh Government National Development Framework (NDF) - The NDF will be the national development plan for Wales and replace the current 20 year 'Wales Spatial Plan - People, Places Futures' 2004 / Updated 2008. The NDF will reflect the seven well-being goals and associated five governance principles of the Well-being of Future Generations (Wales) Act 2015 and Planning Policy Wales (PPW) and draw on national policies covering areas such as natural resources and transport and will help to maximise the potential benefits from funding streams and support the delivery of infrastructure plans. It is expected to cover: the key areas of change for housing; economic development and sector growth and implications for places; renewable energy opportunities; areas of significant natural resources; electrification of rail lines, Cardiff Airport, road schemes and connectivity; infrastructure development of national significance; and the Welsh Language. The NDF will be a 20 year land use framework for Wales, which will:-

- set out where nationally important growth and infrastructure is needed and how the planning system nationally, regionally and locally can deliver it; and
- provide direction for SDPs and LDPs and support the determination of Developments of National Significance.

**2.2.4 WGs National Development Framework: Statement of Public Participation (June 2017) has set the following timetable for the production of the NDF:-**

- publish & consult on the main issues, options and preferred option, supported by environmental reports and assessments (12 weeks: April - June 2018);
- Conduct a 12-week public consultation on the Draft NDF (July - Sept 2019);
- Present a draft NDF to the Assembly for 60 days;

- Have regard to Assembly resolutions / recommendations; and then
- Publish the NDF (September 2020).

**2.2.5** The review of the LDP will have to be in conformity with the NDF.

**2.2.6 Welsh Government Regionalisation Proposals** - The White Paper 'Reforming Local Government: Resilient and Renewed' (Jan 2017) is the Welsh Government's statement of intent about the future of Local Government in Wales. The proposals in this White Paper set out arrangements for regional working; describe a strengthened role for councils and councillors; provide a framework for any future voluntary mergers; and sets out the role of community councils.

**2.2.7** Furthermore, on 13<sup>th</sup> December 2017, the Welsh Minister wrote to the relevant LPAs, inviting them to submit proposals for a Strategic Development Plan (SDP) for South East (Cardiff), Mid & West (Swansea) and North Wales, with no timescale specified (copy attached at Appendix 3). Similarly, the Minister wrote an additional letter to specific groups of LPA's, including Bridgend, RCT and Caerphilly in "South East Wales - West", inviting them to prepare a 'Joint LDP'; with a positive response requested by 28<sup>th</sup> February 2018 (attached at Appendix 4). This matter is considered in later on in this report.

**2.2.8 Well-being of Future Generations Act, 2015** - The Well-being of Future Generations (Wales) Act 2015 - gained Royal Assent and became law on 29 April 2015. The Act strengthens existing governance arrangements for improving the well-being of Wales to ensure "that the needs of the present are met without compromising the ability of future generations to meet their own needs", which is known as the "sustainable development principle". It identifies Seven goals (i.e. a prosperous, resilient, healthier, more equal and globally responsible Wales; and a Wales of cohesive communities, vibrant culture and thriving Welsh Language) to improve the well-being of Wales and introduces national indicators (which have not yet been produced), which will measure the difference being made to the well-being of Wales. It defines "sustainable development" as the process of improving the economic, social, environmental and cultural well-being of Wales by taking action, in accordance with the 'sustainable development principle', aimed at achieving the above well-being goals. Five governance principles are also provided (i.e. long term; integration; collaboration; prevention; and involvement) to aid in the consideration of this work. The LDP was prepared iteratively with a Strategic Environmental Assessment / Sustainability Appraisal (SEA/SA) which accords with sustainable development principles. Therefore the LDP review and emerging Local Well Being Plans under the Act will need to be informed by sustainable development principles and there will be clear linkages between the aims and objectives of respective plans. The potential impact of the Act and Local Well Being Plans for any revised LDP are considered in this report.

**2.2.9 Environment (Wales) Act, 2016** - The Environment (Wales) Act received Royal Assent and became law on 21 March 2016. It puts in place the legislation needed to plan and manage Wales' natural resources in a more proactive, sustainable and joined-up way; and requires Natural Resources Wales (NRW) to report on the principality's natural resources and detail their ability to respond to pressures and adapt to climate change. Therefore NRW published the State of Natural Resources Report (SoNaRR) in September 2016.

**2.2.10** Similarly, the Welsh Government published the National Natural Resources Policy (NNRP) in August 2017; the focus of which is the sustainable management of Wales natural resources, to maximise their contribution to achieving goals within the Well Being of Future Generations Act. The NRP sets out three National Priorities of delivering nature based solutions; increasing renewable energy and resource efficiency; and taking a place based approach. It will set the context for NRW to produce "Area Statements" to ensure that the national priorities for sustainable management of natural resources inform the approach to local delivery. The SoNaRR, NNRP and Area Statement (when produced) will be considered in the review of the LDP.

**2.2.11 Historic Environment (Wales) Act, 2016** - The Act received Royal Assent and became law on 21 March 2016 (with some provisions requiring secondary legislation) and makes important improvements to the existing systems for the protection and sustainable management of the Welsh historic environment. In broad terms, the Act aims to give more effective protection to listed buildings and scheduled monuments; enhance existing mechanisms for the sustainable management of the historic environment; and introduces greater transparency and accountability into decisions taken on the historic environment. It also: provides for a statutory register of Wales' Historic Parks and Gardens; secures a more stable future for Wales' Historic Environment Records (HER); establishes an independent 'Advisory Panel for the Historic Environment in Wales' to advise on historic environment policy and strategy at a national level in Wales; and contains provisions relating to a statutory list of historic place names. The implications of the Act will be considered through the LDP Review process.

**2.2.12 Housing (Wales) Act, 2014** - The Act received Royal Assent in September 2014 and aims to improve the supply, quality and standards of housing in Wales. One of the key provisions of the Act provides a duty on local authorities to provide sites for Gypsy and Travellers where a need has been identified. The Gypsy and Traveller Accommodation Assessment has now been formally approved by Bridgend County Borough Council Cabinet and Welsh Government. In summary, the GTAA covers the period 2016-2031 and estimates the additional pitch provision needed for Gypsies and Travellers in Bridgend. For the first 5 years of the GTAA plan period, there is no requirement for additional pitches, and for the remainder of the GTAA plan period, a further 1 additional pitch is required. This gives a total need for the whole GTAA plan period of 1 additional pitch. It is also noted that the Welsh Government have also consulted upon a draft circular for 'Planning of Gypsy, Traveller and Showpeople Sites' (February 2017) to update several existing Circulars and a draft replacement national strategy 'Enabling Gypsies, Roma and Travellers (September 2017). Therefore, Gypsy and Traveller provision will be given further consideration through the LDP review process.

**2.2.13 Welsh Government 'Prosperity for All: the national strategy'** - takes the commitments of their 5 year programme for government, 'Taking Wales Forward: 2016 - 2021', and places them in a long-term context, and sets out how they will be delivered by bringing together the efforts of the whole Welsh public sector. The four Key Themes of the strategy are the same as those in Taking Wales Forward, which are: 'Prosperous & Secure'; 'Healthy & Active'; 'Ambitious & Learning'; and 'United & Connected'. There are five Priority Areas which have the greatest potential contribution to long-term prosperity and well-being and include: 'Early Years'; 'Housing'; 'Social Care'; 'Mental Health'; and 'Skills & Employability'. It is considered that the Prosperity for All: the national strategy will influence the expected Cardiff Capital Region SDP and Bridgend LDP Review; although much will depend on if it changes WG investment / grant aid priorities.

**2.2.14 Welsh Government Valleys Task Force Our Valleys, Our Future (July 2017)** - This Ministerial Taskforce for the South Wales Valleys has published a high-level action plan which outlines its priorities for the future. The key priorities in the Plan are: good quality jobs and the skills to do them; better public services; and my local community. The Taskforce want to discuss how these priorities can be further developed into more tangible actions and further refine the plan; and public events were also planned. It sets out a range of aims and actions in each of the three priority areas, including: closing the employment gap between the South Wales Valleys and the rest of Wales by getting an additional 7,000 people into work by 2021 and creating thousands of new, fair, secure and sustainable jobs; and exploring the development of a Valleys Landscape Park, which has the potential to help local communities use their natural and environmental resources for tourism, energy generation and health and wellbeing purposes. The Taskforce aims to “Explore all options to target investment and create new strategic hubs in specific areas across the Valleys. These will be areas where public money is focused to provide opportunities for the private sector to invest and create new jobs. The focus of each hub will reflect the opportunities and demand in a particular area and their aspirations for the future.” The hub locations are:

- Pontypridd/Treforest, focusing on residential, office, industrial and retail development;
- Caerphilly/Ystrad Mynach, focusing on residential, office and industrial development;
- Cwmbran, focusing on office, industrial and residential development;
- Merthyr Tydfil, focusing on office, industrial and residential development;
- Neath, focusing on industrial, residential, digital and energy development.
- Northern Bridgend, focusing on employments sites, energy projects, residential developments, tourism and culture.
- Ebbw Vale, focusing on a new automotive technology business park, with the potential to support 1,500 new full-time equivalent jobs.

### **Planning Policy Wales and Technical Advice Notes**

**2.2.15** Since adoption of the LDP in 2013 the three AMR’s have reported on amendments to national planning policy in respect of Planning Policy Wales and associated Technical Advice Notes which have implications for and need to be considered as part of the LDP Review. The key changes since 2013 are set out below:

PPW Amendments:-

- Chapter 1: Introduction (November 2016)
- Chapter 2: Local Development Plans (January 2016 & November 2016)
- Chapter 3: Development Management (November 2016)
- Chapter 4: Planning for Sustainability (July 2014, January 2016 & November 2016)
- Chapter 6: Historic Environment (November 2016)
- Chapter 10: Retail and Commercial Development (November 2016)
- Chapter 14: Minerals (January 2016)

#### **2.2.16** New / Amended Technical Advice Notes:-

- TAN 1: Joint Housing land Availability Studies (January 2015)
- TAN 4: Retail and Commercial Development (November 2016)
- TAN12: Design (July 2014 & March 2016)
- TAN 20: Planning and the Welsh Language (October 2017)
- TAN 21: Waste (February 2014)
- TAN 22: Planning and Sustainable Buildings - Deleted by WG in July 2014
- New TAN 23:Economic Development (February 2014)
- New TAN 24: The Historic Environment (May 2017)

**2.2.17** Draft Planning Policy Wales (10) is currently being consulted upon. The draft PPW has been re-drafted so that the seven well-being goals and five ways of working of the Well Being and Future Generations is fully integrated into policy. Any future amendments of PPW (10) will inform the review process.

**2.2.18 Welsh Language** - Chapter 4 of PPW has been updated to reflect the requirements of the Planning (Wales) Act 2015 relating to the consideration of the Welsh language in the appraisal of development plans. PPW states that LPAs must consider the likely effects of their development plans on the use of the Welsh language in the Sustainability Appraisal of their plans, and should keep their evidence up to date. All local planning authorities should include in the reasoned justifications to their development plans a statement on how they have taken the needs and interests of the Welsh language into account in plan preparation, and how any policies relating to the Welsh language interact with other plan policies. TAN 20 'Planning and the Welsh Language' (October 2017) provides more detailed advice; Part B of which contains 'Practice Guidance' to assist LPAs with the consideration of Welsh language issues during the preparation, monitoring and review of LDPs. This will be undertaken as part of the LDP review.

**2.2.19 The Strategy for Older People in Wales: Living Longer, Ageing Well (2013-2023)** – The Strategy aims to address the barriers faced by older people in Wales today and to ensure that well-being is within the reach of all. This strategy identifies three main priority areas for action: social resources, environmental resources and financial resources. However it also recognises that good physical and mental health, lifestyle factors, access to information and advice, equality and diversity, language needs, and preparation for later life are important issues in each of these priority areas.

**2.2.20 Welsh Government Future Trends Report (2017)** – The report identifies the key social, economic, environmental and cultural trends that could affect Wales in the future, as well as some of the factors that could influence the direction of those trends. The report encourages readers to consider these future trends in combination with each other, and to start to identify and discuss the potential opportunities and challenges they might present for us all.

**2.2.21 The Active Travel (Wales) Act (2015)** - places a requirement on local authorities to continuously improve facilities and routes for walkers and cyclists and to prepare maps identifying current and potential future routes for their use. The Act will also require new road schemes to consider the needs of pedestrians and cyclists at design stage.

## **Regional Context**

**2.2.22 Cardiff City Region Strategic Development Plan (SDP)** - The Planning (Wales) Act 2015 introduces powers for the Welsh Ministers to designate 'strategic planning areas' and for 'Strategic Planning Panels' (SPP) to be established for these areas. An SPP, if established for an area, will then be responsible for preparing a 15-20 year Strategic Development Plan (SDP) that will form part of the formal 'development plan' for that area. These new sub-regional development plans will only apply to cohesive regions of greater than local significance (such as the Cardiff city region). An SDP is expected to cover cross boundary matters of more than local community importance; and could include the strategic elements of LDPs; such as larger housing / employment sites, major transport schemes, etc. Preparation of an SDP is expected to take at least 4 years from commencement and will generally mirror the current LDP process. SDP's will address cross-boundary issues at a regional level and must be in conformity with the NDF. Before the SDP can be prepared the lead 'responsible authority' for the SDP has to submit a 'Proposal' (a map showing the boundaries of the proposed area and a statement of the reasons for proposing that area; with a consultation report) for a 'strategic planning area' to the Welsh Ministers who can then designate the strategic planning area and establish the Panel.

**2.2.23** On 13<sup>th</sup> December 2017 the Welsh Minister wrote to relevant Welsh LPAs inviting them to prepare proposals for three regional SDPs (Bridgend being part of the Cardiff City Region) (attached at Appendix 3). On 6<sup>th</sup> February 2018 the 10 Cardiff Capital Leaders responded to the Cabinet Secretary confirming support by all 10 Leader of the CCR to the principle of preparing a SDP for the South-East region. Their formal response is attached as Appendix 5.

**2.2.24 Cardiff Capital Region City Deal (CCRCD)** - The CCRCD was signed by the 10 constituent Local Authority Leaders (from Blaenau Gwent, Bridgend, Caerphilly, Cardiff, Merthyr Tydfil, Monmouthshire, Newport, Rhondda Cynon Taff, Torfaen and the Vale of Glamorgan), the Secretary of State for Wales, the Chief Secretary to the Treasury and the First Minister on 1<sup>st</sup> March 2017. The CCRCD is a 20 year / £1.28 billion investment programme which aims to achieve a 5% uplift in the Region's GVA (*Gross Value Added* - a measure of the value of the goods produced and services delivered in the area) by delivering a range of programmes which will increase connectivity, improve physical and digital infrastructure, as well as regional business governance. Over its lifetime, local partners expect the CCRCD to deliver up to 25,000 new jobs and leverage an additional £4 billion of private sector investment by 2036. The CCRCD has 6 Objectives:-

1. Connecting the Cardiff Capital Region;
2. Investing in innovation and the digital network;
3. Developing a skilled workforce and tackling unemployment;
4. Supporting enterprise and business growth;
5. Housing development and regeneration; and
6. Developing greater city-region governance across the Cardiff Capital Region.

**2.2.25** The Cardiff Capital Region Transition Plan will detail key activity to be undertaken, including establishing a Regional Office to drive the delivery of the Regional Cabinet's work programme in anticipation of receiving proposals. This includes the creation of a bespoke impact assessment model for those proposals. The investment proposal as part of this key strategic program represents significant opportunity for the wider South East region. Capitalising on the opportunities presented by City Deal will be a key focus of the LDP Review.

**2.2.26 Cardiff Capital Region: Regional Housing Investment Fund** – Regional Housing Investment Fund aims to support house building, ranging from larger builders and developers on stalled housing sites on former industrial sites, through to small builders, community builders, custom builders and regeneration specialists, on small sites across the region. The fund also aims to help stimulate the SME building sector across the region by providing loan development finance and launching a Custom Build Scheme, releasing smaller plots of public sector land with a full package of support for SMEs to deliver new homes in the communities.

**2.2.27 Cardiff Capital Region Sites and Premises Work** – is focusing on identifying Strategic Employment Sites for inclusion in a Strategic Development Plan and also identify employment premises and sites that require public sector investment.

### **Neighbouring LDPs**

**2.2.28** The Vale of Glamorgan LDP was adopted by the Council on 28<sup>th</sup> June 2017 and provides the local planning policy framework up till 2026.

**2.2.29** Neath Port Talbot LDP was adopted by the Council on 27<sup>th</sup> January 2016 and provides the local planning policy framework up until 2026.

**2.2.30** Rhondda Cynon Taf LDP was adopted by the Council on 2<sup>nd</sup> March 2011 and provides the local planning policy framework up until 2021. Based on the statutory review dates of both RCT and Bridgend there is scope to work collaboratively where possible to prepare a shared joint evidence base.

### **Local Context**

**2.2.31** A number of local policy documents, strategies have been prepared or revised since adoption of the LDP.

**2.2.32** Bridgend Local Transport Plan In May 2015, the Welsh Government approved Bridgend County Borough Council's Local Transport Plan (LTP) for adoption. The LTP covers the Bridgend County Borough geographical area and sets out the Council's priorities for transport investment over the next 15 years. The primary focus of the LTP is to address issues relating to local transport and how it can facilitate economic growth and change travel behavior.

**2.2.33** Bridgend Draft Well Being Plan 2018-2023- From 1 April 2016, the Well-being of Future Generations (Wales) Act 2015 introduced statutory Public Services Boards (PSB) across each local authority area in Wales. PSBs will work together to improve the social, economic, cultural and environmental well-being of the board's area. The newly formed PSBs will consist of four

statutory Members:

- The relevant Local Authority
- Health Board
- Fire and Rescue Service
- Natural Resources Wales
- A range of other partners known as 'Invited Participants'

**2.2.34** In line with the Act, each PSB is required to assess the state of well-being across the area as a whole and within its communities to inform the PSB's Well-being Plan. The plan must be published by April 2018 and should set out a series of well-being objectives identifying the priorities the PSB has agreed for the area in order to contribute to achieving seven national well-being goals as set out by the Act. A Local Wellbeing Assessment was published by the Bridgend Public Service Board in May 2017. The final published plan (expected May 2018) and associated background evidence will be used to inform the review of the LDP. Further detail on the implications for the LDP is set out in later in this report.

**2.2.35 Bridgend Band B School Modernisation Programme** – In December 2017 Welsh Government gave 'approval in principle' for a programme funding envelope of £68.2m. In January 2018 Cabinet and Council approved the financial commitment and also for the Band B programme to be included within the capital programme.

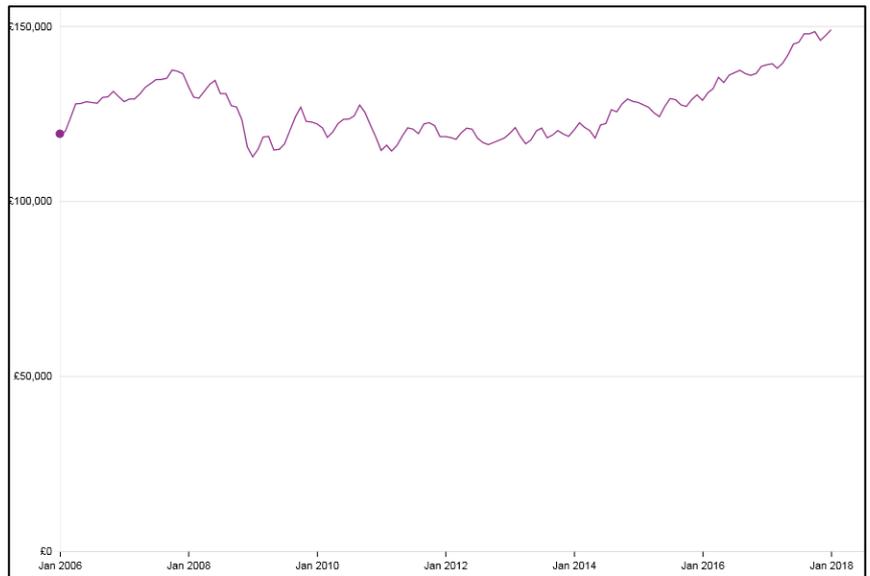
**2.2.36 Aging Well in Bridgend Plan** - The 'Ageing Well in Bridgend' plan is aligned to the objectives of the Local Authority and Local Public Service Board and supports the targeted outcomes for older people in relation to the five priority areas of the National Strategy. BCBC's integrated approach to working with health will support collaborative working within and across the prioritised themes and make progress towards joint ownership of the plan, its outcomes and investment needs. The five 'Ageing Well in Wales' priority themes are:

- Age friendly communities
- Dementia supportive communities
- Falls prevention
- Opportunities for employment and learning
- Loneliness and isolation

**2.2.37 Bridgend Nature Recovery Plan / Local Biodiversity Action Plan (2014)** - This LBAP (Local Biodiversity Action Plan) is an update of the Local Biodiversity Action Plan originally written in 2002. This LBAP considers the wider role that biodiversity plays in providing benefits to Bridgend County Borough. In particular the LBAP should be read alongside the Landscape Character Area (LCA) report by Land Use Consultants (LUC, 2013) which described the different parts of the county and what is unique and special about them.

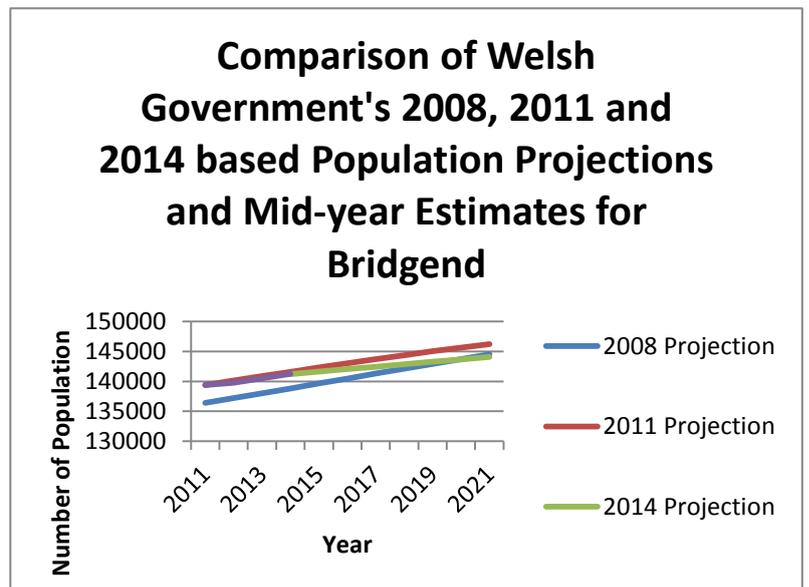
**2.2.1 House Prices** - Latest Bridgend Housing Market Overview - Information below (from the Land Registry UK House Price Index (HPI) information) shows that over the last 12 years, average house prices in Bridgend have risen from £119,008 in January 2006 to £148,951 in January 2018 an increase of 25%.The graph below shows the average House Prices in Bridgend.

**2.2.2** The Land Registry data indicates house sale prices in Bridgend consistently below the national England and Wales sales prices. However, a continued economic recovery; as well as a national housing shortage; and continuing low mortgage rates; with the Government's 'Help to Buy' (NewBuy Cymru) equity loan mortgage scheme are also helping to drive this market growth and house price growth.



**2.2.3 Welsh Government Population and Household Projections** - The LDP is based on the Cambridge Econometrics (CE) Population Projections for Bridgend and Wales which estimated that Bridgend's population would increase from 132,600 to 144,640 between 2006 and 2021. The corresponding household projections indicated a need for an additional 9,690 households to meet this growth in population.

**2.2.4** Since the LDP was adopted, the Welsh Government has released new population projections based on the 2011 census (published 2013), population projections based on mid-year population estimates for 2014 (published 2016) and mid-year population estimates (published annually). The key changes for Bridgend are as follows:

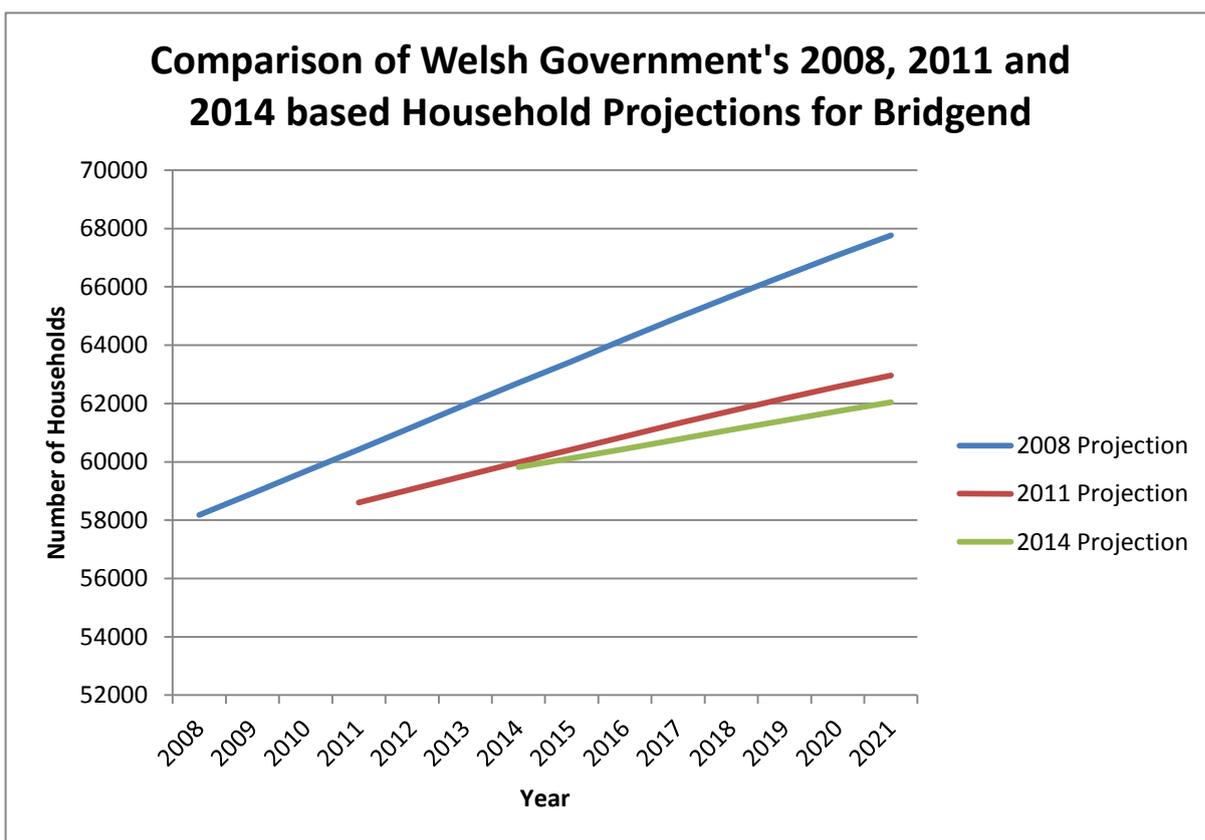


- The 2011 based projections suggest that the population will increase from 139,410 in 2011 to 146,242 by 2021.
- The 2014 based projections indicate that population levels will continue to increase from 141,214 to 144,093 between 2014 and 2021.
- The mid-year estimates for the period 2011 to 2016 identify a steady increase from 139,410 to 143,408, which equates to an increase of 0.57% per year over the last five years.

**2.2.5** Corresponding household projections have also been released by the Welsh Government based on 2011 Census data (published 2014) and the 2014 population projections (published 2017). The key changes for Bridgend are as follows:

- The 2011 based projections estimate that the number of households will increase from 58,601 to 62,965 between 2011 and 2021. This suggests that approximately 436 dwellings will need to be built per year.
- The 2014 based projections estimate that the number of households will increase from 59,820 to 62,040 between 2014 and 2021. This suggests that approximately 317 dwellings will need to be built per year.

**2.2.6** The latest Welsh Government household projections indicate a much lower increase in household numbers than the 2008 based projection which has informed the LDP's Strategy of 'Growth and Regeneration' (see Figure 3 below). The LDP's current housing requirement of delivering 646 dwellings per annum is higher than the 436 and 317 dwellings per annum required by the 2011 and 2014 based projections retrospectively. It is therefore considered appropriate to reconsider the housing requirement as part of the preparation of a revised LDP.



### 3. Assessment of likely changes required to the current adopted LDP

#### 3.1 Review of LDP Vision and Objectives

##### LDP Vision

3.1.1 In order to tackle key issues and guide and manage future development the LDP identified a clear vision of what the County Borough should look like in 2021. Therefore as part of the review of the LDP this needs to be revisited to ensure it remains relevant to local needs and aspirations beyond the plan period. The LDP Vision was developed through stakeholder engagement and informed by a range of key strategies including the Bridgend Community Strategy. It states that:

3.1.2 ***By 2021, Bridgend County Borough will be transformed to become a sustainable, safe, healthy and inclusive network of communities comprising strong, interdependent and connected settlements that can offer opportunities, an improved quality of life and environment for all people living, working, visiting and relaxing in the area. The catalysts for this transformation will be:***

- ***a successful regional employment, commercial and service centre in Bridgend;***
- ***a vibrant waterfront and tourist destination in Porthcawl;***
- ***a revitalised Maesteg;***
- ***a realisation of the strategic potential of the Valleys Gateway; and***
- ***thriving Valley communities***

3.1.3 In 2013 the Community Strategy was replaced by the Single Integrated Plan (SIP): 'Bridgend County Together' replacing four previous statutory plans:

- Community Strategy;
- Social Care and Well Being Plan;
- Children and Young People's Plan; and
- Community Safety Plan.

3.1.4 The SIP identified the following priority areas:

- People in Bridgend County are healthier
- People in Bridgend County are engaged and empowered to achieve their full potential;
- People in in Bridgend County benefit from a stronger and more prosperous economy; and
- Bridgend County is a great place to live, work and visit.

- 3.1.5** The SIP is being replaced by a Local Well Being Plan (Draft currently out for consultation) which a requirement of the Well Being of Future Generations Act (2015).
- 3.1.6** The Well Being and Future Generations Act established Public Service Board for each local authority area in Wales who must improve the economic, social environmental and cultural well-being of its area by working to achieve the well-being goals. The Bridgend PS (established in April 2016) are responsible for preparing and publishing a Local Well Being Plan (LWBP) which sets out its objectives and the steps it will take to meet them. The four statutory members of the PSB are the Local Authority, Local Health Board, Fire and Rescue Authority and Natural Resources Wales; other organisations are also invited. As part of its responsibility the PSB has produced a well-being assessment which assesses the state of economic, social, environmental and cultural well-being in Bridgend. The PSB Draft LWBP has recently been subject to consultation. The draft objectives are set out below and will inform the vision and objectives for the replacement LDP:
- Objective 1 Best Start in Life;
  - Objective 2 Support Communities in Bridgend to be safe and cohesive;
  - Objective 3 Reduce Social and Economic Inequalities; and
  - Objective 4 Healthy Choices in a Healthy Environment.
- 3.1.7** The Act places a duty on public bodies including local authorities to carry out sustainable development and to set objectives which maximise its contribution to achieving each of the seven wellbeing goals namely 'a globally responsible Wales', a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales; a Wales of cohesive communities, and a Wales of vibrant culture and thriving Welsh Language.
- 3.1.8** Planning Policy Wales states that the Local Well Being Plan should provide the overarching strategic framework for all other plans and strategies for the local authority including the LDP. The LDP will need to complement the LWBP and ensure that it expresses in land use terms, those elements of the LWBP that relate to the development and use of land.

### **LDP Objectives**

- 3.1.9** The LDP Vision is delivered through 4 Strategic Objectives (and 23 specific objectives) which seek to address the national, regional and local issues facing the County Borough. These four strategic objectives are at the centre of the LDP: They are:
1. To produce high quality sustainable places;
  2. To protect and enhance the environment;
  3. To spread prosperity and opportunity through regeneration; and
  4. To create safe, healthy and inclusive communities.

## Assessment of the existing LDP Objectives against the Well Being Goals

**3.1.10** The assessment of compatibility between the 4 Strategic LDP Objectives (and 23 specific objectives) and the 7 Well Being Goals indicates that the current LDP Objectives contribute to achieving a range of Well Being goals and individual objectives delivering multiple goals. There is no obvious conflict between the Objectives and the Well Being Goals. However, ensuring the LDP and LWBP Objectives are compatible may require wording amendments to respective objectives going forward.

**3.1.11** The table below provides an assessment of LDP Objectives against Well Being Goals.

| LDP Objectives   | Well Being Goals |                 |                 |                  |                      |   |                            |
|--|------------------|-----------------|-----------------|------------------|----------------------|---|----------------------------|
|  | Prosperous Wales | Resilient Wales | Healthier Wales | More Equal Wales | Wales of cohesive of | Wales of vibrant culture and thriving Welsh | Globally responsible Wales |
| <b>1. To produce high quality sustainable places</b>   |                  |                 |                 |                  |                      |   |                            |
| <i>1a. To promote Bridgend as the key principal settlement of the County Borough where major employment, commercial and residential development is focused.</i>                                  |                  |                 |                 |                  |                      |   |                            |
| <i>1b. To revitalise Maesteg by recognising its role as the principal settlement serving the Llynfi Valley which has the potential capacity and infrastructure to accommodate future growth.</i> |                  |                 |                 |                  |                      |   |                            |
| <i>1c. To realise the potential of Porthcawl as a premier seaside and tourist destination which capitalises on the regeneration of its waterfront.</i>   |                  |                 |                 |                  |                      |   |                            |
| <i>1d. To recognise the strategic potential of the Valleys Gateway to provide for future development and facilities serving the whole of the County Borough.</i>                                 |                  |                 |                 |                  |                      |   |                            |
| <i>1e. To promote sustainable and attractive valley settlements with improved access to jobs and services.</i>   |                  |                 |                 |                  |                      |   |                            |
| <i>1f. To reduce traffic growth, congestion and commuting levels whilst promoting the safe and efficient use of the transport network.</i>   |                  |                 |                 |                  |                      |   |                            |

|   |  |  |  |  |  |  |
|---|--|--|--|--|--|--|
| 1g. To support integrated transport solutions and measures that will encourage modal shift to more sustainable forms of transport for people and freight.   |  |  |  |  |  |  |
| <b>2. To protect and enhance the environment</b>  |  |  |  |  |  |  |
| 2a. To promote, conserve and enhance the natural, historic and built environment of the County Borough.   |  |  |  |  |  |  |
| 2b. To safeguard the quality of water, air and soil and tackle all sources of pollution.  |  |  |  |  |  |  |
| 2c. To manage development in order to avoid or minimise the risk and fear of flooding and enable and improve the functionality of floodplains.  |  |  |  |  |  |  |
| 2d. To meet the Council's regional and local commitments for mineral resources, waste management and waste disposal.  |  |  |  |  |  |  |
| 2e. To contribute towards the energy needs of Wales with a focus on the promotion of renewable energy.  |  |  |  |  |  |  |
| <b>3. To spread prosperity through regeneration</b>   |  |  |  |  |  |  |
| 3a. To build a more diverse, dynamic and self reliant economy and business environment.   |  |  |  |  |  |  |
| 3b. To provide a realistic level and variety of employment land to facilitate the delivery of high quality workspaces and job opportunities.  |  |  |  |  |  |  |
| 3c. To bring the benefits of regeneration to the valley communities by directing new development to those areas at a scale which acknowledges their geographical constraints and infrastructure capacity. |  |  |  |  |  |  |
| 3d. To capitalise upon the environmental assets and tourism potential of Porthcawl to encourage people to visit and stay in the County Borough.   |  |  |  |  |  |  |
| 3e. To enable Bridgend Town to become an attractive and successful regional retail and commercial destination which meets the needs of its catchment.   |  |  |  |  |  |  |

|  |  |  |  |  |  |  |  |  |  |
|--|--|--|--|--|--|--|--|--|--|
| 3f. To support viable town and district centres in the County Borough which are attractive and economically successful.  |  |  |  |  |  |  |  |  |  |
| 3g. To protect and promote the role of smaller shopping centres and freestanding local shops in the County Borough.  |  |  |  |  |  |  |  |  |  |
| <b>4. To create safe, healthy and inclusive communities</b>  |  |  |  |  |  |  |  |  |  |
| 4a. To provide a land use framework that recognises the needs of deprived areas within the County Borough, which affords those communities the opportunities to tackle the sources of their deprivation. |  |  |  |  |  |  |  |  |  |
| 4b. To ensure that there is equality of access to community services for all sectors of the community, addressing the particular needs of children the young, older people and the less able.            |  |  |  |  |  |  |  |  |  |
| 4c. 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.              |  |  |  |  |  |  |  |  |  |
| 4d. To provide for the required quantity and range of accessible leisure, recreational, health, social and community facilities throughout the County Borough.   |  |  |  |  |  |  |  |  |  |

**3.1.12** Overall, however, there is no fundamental conflict with purpose and objectives of the LWBP. Should any changes be made to the Plan, these would have to be devised in accordance with the well-being goals.

## **Review of LDP Regeneration-Led Sustainable Development Distribution Strategy**

- 3.2** 'Regeneration' in the context of the LDP's Regeneration-Led Spatial Strategy, is defined as an overarching and balanced process that delivers investment and opportunity to areas and communities within the County Borough of previous or current decline, to improve their physical, economic and social fabric.
- 3.2.1** In the context of the County Borough, regeneration needs and priorities relate to the development of specific sites that are key to the success of the County Borough, including those that are in need of redevelopment and investment, and sustaining wider communities that are in particular need of regeneration and growth to stem acknowledged and continuing decline.
- 3.2.2** The Regeneration-Led Spatial Strategy puts in place a policy framework that can best deliver the regeneration needs of the County Borough in order for it to prosper and fully realise its potential. The LDP Strategy was developed to provide a land use framework, to help realise the regeneration aspirations and priorities of the Council, and make the most meaningful contribution with respect to securing social, environmental and economic benefits for the communities of the County Borough.

### **Focused Regeneration**

- 3.2.3** Taking into account the spatial distribution of regeneration activities and needs, development is directed to settlements and parts of the County Borough which will benefit the most and where there are opportunities for securing the greatest positive impacts and benefits of growth.
- 3.2.4** In line with the above, four Strategic Regeneration Growth Areas (SRGAs) at:
- Bridgend;
  - Porthcawl;
  - Maesteg and the Llynfi Valley; and
  - The Valleys Gateway
- 3.2.5** together with four Strategic Employment Sites at:
- Brocastle, Waterton, Bridgend;
  - Island Farm, Bridgend;
  - Pencoed Technology Park, Pencoed; and
  - Ty Draw Farm, North Cornelly
- 3.2.6** have been identified which, collectively, will deliver a range of mixed-use developments and facilities. The re-use of brownfield and under-utilised land in this way is viewed by national policy as a key way to creating a more sustainable pattern of development. Therefore the overall preference of the LDP Strategy is for the development of land within urban areas, especially on previously developed 'brownfield' sites, before considering the development of greenfield sites. The level of development and growth identified in the LDP has taken into account how much development would be required to have a significant regenerative effect, the availability of sites for development in that area, existing settlement patterns, having regard to the social and economic function and identity of settlements and to relevant environmental considerations.

### **Strategic Development Distribution**

- 3.2.7** In order to Produce High Quality Sustainable Places, Strategic Policy SP1 aims to ensure that development is distributed according to the LDP's Regeneration-Led Sustainable Development Strategy. To assess how effective the LDP has been is in implementing its

overall Strategy a number of indicators and targets have been devised by the Council that measure the 'spatial distribution' of housing and employment development. Policy Target 1 measures the spatial distribution of housing growth and requires that 85% or more of housing development, on allocated sites takes place within the Strategic Regeneration Growth Areas (SRGAs) by 2021.

- 3.2.8** At a base date of 2009, Housing Policies COM1 and COM2 of the LDP allocated 7,894 housing units across the County Borough. 6,358 of these allocated housing units are located within the 4 SRGAs of Bridgend, Maesteg and the Llynfi Valley, Porthcawl and the Valleys Gateway.
- 3.2.9** At 2017, since the base date of 2009, a total of 2703 housing units have been completed on all allocated sites, 1773 of these units have been completed within the 4 SRGAs – which represents 65.6% of overall completions on allocated sites within the 4 SRGAs. This is below the 85% 2021 target but considerably greater than the 2016 Interim Target of 38%.
- 3.2.10** In distribution terms 'between' the 4 SRGAs, Bridgend and the Valleys Gateway have over performed in terms of delivery, with 43% of completions taking place in Bridgend (compared with a distribution of allocations of 42%) and 17.5 % of completions, within the Valleys Gateway (compared with a distribution of 16% of allocations), Porthcawl (5%) and Maesteg and the Llynfi Valley (0.2%) have underperformed in terms of delivery, which is largely attributed to the delay in bringing forward the Porthcawl Waterfront Regeneration Area and within the Llynfi Valley, where there has been issues of housing market viability and the need to overcome various site constraints by land reclamation and land assembly. (A review of these sites is provided in Appendix 2).
- 3.2.11** Policy Targets 2 and 3 measure the 'distribution' of employment development on allocated employment sites, and the readying of the 4 Strategic Employment Sites respectively. Policy Targets 2 and 3 requires that 80% or more of employment land is developed within employment allocations located within the 4 Strategic Regeneration Growth Areas (SRGAs) and that by 2016 all the Strategic Employment Sites are classified in the Annual Employment Land Review as immediately or short term available.
- 3.2.12** For the monitoring period 1st April 2016 – 31 March 2017, 1.13 hectares of vacant employment land was taken up for development on allocated sites within the SRGAs. The total take up of employment land (including sites outside of SRGAs) totalled 1.40 hectares. This therefore represents 80.7% of overall take with the SRGAs, which meets the monitoring target of 80% and reveals that the spatial distribution is broadly on track, albeit it is accepted that the take up of vacant employment land is low.
- 3.2.13** Policy Targets 1, 2 and 3 have been broadly successful, however the indicators suggest that LDP Policy SP1 is not being effective as it should. In terms of Policy Target 1 the underperformance of Porthcawl, Maesteg and the Llynfi Valley SGRAs in terms of housing delivery are largely attributed to the delay in bringing forward the Porthcawl Waterfront Regeneration Area and within the Llynfi Valley, where there has been issues of housing market viability and the need to overcome various site constraints by land reclamation and land assembly However, this issue will be the subject of rigorous testing during the review process.

## Housing

**3.2.14** Five Policy Targets monitor the performance of whether the LDP is meeting its housing needs by measuring the supply of housing land (Policy Target 25), housing completions, for both market and affordable dwellings (Policy Targets 26 and 29), housing numbers permitted on allocated sites (Policy Target 27), housing density (Policy Target 28) and whether there is a need for a permanent or transit Gypsy and Traveller site (Policy Target 30).

### Housing Land Availability

**3.2.15** Policy Target 25 aims to provide a 5 year supply of housing land for development throughout the plan period. The supply of land for housing is assessed as part of the annual Joint Housing Land Availability Study (JHLAS) which is a statutory document which local planning authorities are required to produce by Welsh Government in accordance with guidance set out in Planning Policy Wales (PPW) and Technical Advice Note (TAN) 1. Supply is assessed against the housing requirements of an adopted development plan.

**3.2.16** The 2017 JHLAS shows that the County Borough has housing land supply, assessed against the housing requirement of the Bridgend LDP of 4.0 years.

| Study Date  | Number of Years of Supply |
|-------------|---------------------------|
| 2007        | 8.1                       |
| 2008        | 6.6                       |
| 2009        | 6.2                       |
| 2010        | 5.2                       |
| 2011        | 5.5                       |
| 2012        | 5.1                       |
| 2013        | 5.7                       |
| 2014        | 6.0                       |
| 2015        | 5.4                       |
| 2016        | 5.1                       |
| <b>2017</b> | <b>4.0</b>                |

**3.2.17** The table above demonstrates that this is the first year since the LDP adoption in 2013 that the land supply has fallen below the 5 year target. Where the land supply is less than 5 years, TAN1 states that local planning authorities should consider the reasons for the shortfall and whether the LDP should be reviewed either in whole or in part.

**3.2.18** It is considered that the most effective way of rectifying this issue is through an early review/revision of the adopted LDP given the importance attached to the land supply issue. However, the statutory 4 year LDP review process will provide the impetus for the LPA to update its evidence base, review the LDP strategy, and rectify the land supply issues by identifying and allocating additional housing land. This would assist in seeking to avoid 'planning by appeal' and ad hoc development coming forward outside the development plan system and not in accordance with the LDP's strategy.

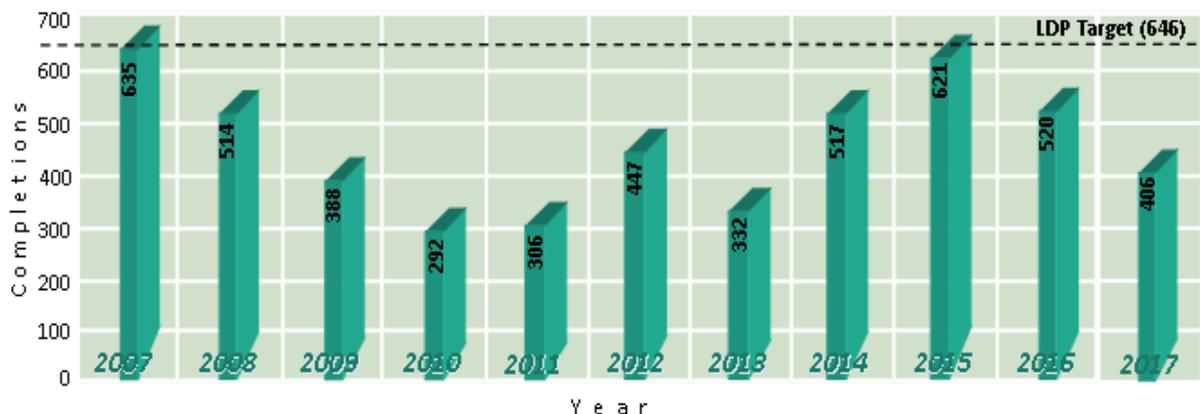
**3.2.19** A review of the AMR’s has shown that the Local Development Plan has performed well delivering many significant benefits for our communities. Most of the housing sites and associated infrastructure allocated in the LDP have been delivered. As expected Bridgend SRGA has delivered the highest proportion of residential units (reflecting the growth strategy of the LDP), in particular Parc Derwen which has delivered 999 residential units. However, it is acknowledged that in the Strategic Regeneration Growth Areas of Maesteg and the Llynfi Valley, Porthcawl and the Valleys Gateway. a number of challenging brownfield sites have stalled due to a combination of viability issues and in some cases land ownership issues albeit that progress is being made in bringing these sites forward. Whilst the LDP’s key housing provision policies have largely been successful, it must be acknowledged that as the plan enters the final stages of its ‘life-cycle’ it is inevitable there would be land supply issues. Nevertheless it is imperative that this issue is addressed as a matter of urgency in the interests of ensuring sustainable growth for the County Borough of Bridgend.

**Housing Completions**

**3.2.20** The LDP (Policy Target 26) aims to provide 9,690 new dwellings by 2021, based on the three, 5 year tranches of delivery set out in Policy SP12 of the LDP. This equates to an average annual completion rate of 646 dwellings per annum which is an ambitious level of growth compared to the level of dwelling completions experienced within the County Borough prior to the start of the plan period in 2006.

**3.2.21** The graph below highlights the annual completions set out in the JHLAS studies from 2013-2017 are consistently below the LDP average completion rate (646 dwellings per annum). The cumulative impact of not achieving the LDP average completion rate has resulted in failure to meet the interim monitoring target to deliver 4,973 residential units by 2016 (this was reported in last year’s AMR).

Dwelling Completions between 2006/07 and 2016/17



**3.2.22** Whilst it is disappointing that target 26 has not been met, the deficit is a reflection of the overall trend in the UK and Wales for housing completions. Last year’s AMR highlighted a deficit of 333 units in terms of the requirement to deliver 4,973 residential units by 2016. The 2017 JHLAS indicates that 406 units were completed since the last study and that 4978 dwellings have now been completed in total, during the LDP period 2006 to 2017. Current data highlights that the LDP has met the 2016 interim target figure albeit a year late.

**Affordable Housing Delivery**

**3.2.23** In terms of the delivery of affordable housing, Policy Target 29 requires the delivery of 1,370 units by 2021 with the interim target to provide 703 affordable dwellings by 2016. Analysis of the housing data indicates that at 2016, 1014 affordable units had been delivered which met

the interim target to provide 703 affordable dwellings by 2016. For the period 2016-2017 an additional 136 affordable housing units were delivered, which provides a total of 1150. As such, it is considered that affordable housing delivery has been relatively successful and the LDP is on track to deliver 1,370 units by 2021.

### **Affordable Housing Policy**

**3.2.24** Policy COM5 of the LDP sets differential affordable housing percentage rates which are sought across three housing sub-market areas within Bridgend:

- Western Settlements, Ogmere Vale, Garw & Upper Llynfi (15%);
- Bridgend, Pencoed and Hinterland (20%); and
- Rural and Porthcawl (30%)

**3.2.25** The affordable housing strategy, housing sub-market areas and percentages sought will be reviewed as part of the overall strategy and aspirations of the revised LDP and updated viability evidence.

### **Gypsy and Traveller Site Provision**

**3.2.26** Policy Target 30 requires that the Local Planning Authority monitors the need for a Gypsy and Traveller Site by recording the annual number of authorised and unauthorised encampments in the County Borough. The interim target is that there is no increase in the average of 3 unauthorised Gypsy and Traveller Sites within 1 year, as recorded in the Gypsy and Traveller Caravan Count and/or the Council's Gypsy and Traveller Protocol. An increase above 3 unauthorised encampments for 2 consecutive years would trigger the requirement to identify a site.

**3.2.27** The Housing (Wales) Act 2014 requires each local authority in Wales to undertake a Gypsy and Traveller Accommodation Assessment to ensure that needs are properly assessed and planned for. An assessment was required to be submitted to Welsh Government by February 2016 with a statutory duty placed on local authorities to make provision for site(s) where an assessment identifies an unmet need.

**3.2.28** The Gypsy and Traveller Accommodation Assessment was formally approved by Bridgend County Borough Council Cabinet and Welsh Government in 2016. In summary, the GTAA covers the period 2016-2031 and estimates the additional pitch provision needed for Gypsies and Travellers in Bridgend. For the first 5 years of the GTAA plan period, there is no requirement for additional pitches, and for the remainder of the GTAA plan period, a further 1 additional pitch is required. This gives a total need for the whole GTAA plan period of 1 additional pitch.

**3.2.29** Therefore, Gypsy and Traveller provision will be given further consideration through the LDP review process. In terms of transit sites, it is considered that these would best be considered on a regional basis, requiring collaboration with neighbouring local authorities through the LDP revision and SDP process. In terms of the existing policy framework, Policy COM6 – Gypsy and Sites - appears to be functioning effectively. However the policy may need to be revised to align with the latest legislation. This issue will be given further consideration in the LDP revision process.

### **Employment Land Development**

**3.2.30** The Local Development Plan's employment land is safeguarded for employment purposes, by Policies SP9 and REG 1. The future prosperity of the local economy is facilitated by ensuring that the County Borough can offer a range and choice of employment sites and premises for employment uses.

- 3.2.31** To achieve the objective of a prosperous local economy Policy Target 19 aims to develop 72.5 ha of employment land during the Plan period up to 2021 and Policy Target 20 aims to ensure that the identified employment allocated by Policy SP9 and REG 1 is readily available. Policy Targets 19 and 20 are monitored by an annual employment land survey which monitors the take-up of vacant land on all of the County Borough's allocated employment sites together with the land's status in terms of availability.
- 3.2.32** The monitoring target associated with Policy Target 19 is that 6.3 hectares of employment land is developed annually on allocated sites. During the monitoring period 01 April 2016 to 31 March 2017 a total of 1.52 hectares of vacant employment land was developed. During the preceding year 0.45 ha of employment land was developed. The AMRs have highlighted that the LDP's strategic aim of delivering 6.3 ha of employment land per annum allocated by Policies SP9 and REG1 per annum has not been partially met for 3 consecutive years with respect to Policy Target 21; therefore further analysis is required to determine why the LDP has not delivered 6.3ha of employment land.
- 3.2.33** In this context it is important to note that the amount of land allocated for employment purposes in the LDP exceeded the need identified in the Employment Land Review (2010). This approach was adopted to reflect that national planning policy advocated at the time adopting a positive, flexible approach to employment land provision which would provide a simple policy framework for private sector enterprise to operate within, giving a range and choice of sites across the County Borough. This approach also supported the Local Planning Authority in implementing the regeneration-led spatial strategy of the LDP.
- 3.2.34** Whilst the County Borough of Bridgend has one of highest rates of employment land in South East Wales it is important to recognise that the amount of employment land allocated has not frustrated the population and housing growth aspirations of the Plan. Employment land provision was aligned, to the strategic spatial distribution of this growth. In the context of a regeneration-led strategy, it was considered important that employment land provision should not be tied to, and limited by, population growth, but should reflect the economic regeneration objectives of the plan; helping to assist the Council and its partners in tackling some of the existing economic deprivation which currently exists in the County Borough in a positive, flexible manner.
- 3.2.35** In recognition of the need for the borough to have a range and choice of employment sites which are attractive and flexible enough to potential investors, LDP Policy SP9 allocated 38 hectares of strategic employment land at the following locations:
- SP9(1) Brocastle, Waterton, Bridgend 20 Hectares
  - SP9(2) Island Farm, Bridgend 11 Hectares
  - SP9(3) Pencoed Technology Park 5 Hectares
  - SP9(4) Ty Draw Farm, North Cornelly 2 Hectares
- 3.2.36** The strategic sites are distinguished from other employment sites on the basis of their physical and locational characteristics, particularly their prominent locations adjacent to areas of countryside, and their proximity to the strategic road network. They represent the greatest assets to Bridgend and the region in terms of their potential to generate high levels of jobs but it must be acknowledged that the allocation of these sites skew the figures in terms of the amount land allocated for employment purposes exceeding the need identified in the Employment Land Review (2010).
- 3.2.37** Considerable progress is also being made with 'readying' the 4 Strategic Employment Sites for development, however it is important to recognise that these sites require substantial investment in infrastructure and will have long-lead in times but as the economy improves (albeit slowly) and market demand improves it is predicted that these strategic sites are likely

to be delivered at the end of the plan period / post 2021.

- 3.2.38 SP9(4) Ty Draw Farm** – The site benefits from a planning consent, P/12/796/FUL – granted 22/01/14, for 94 dwellings associated access, open space, with B1 employment use for the remainder of the site. On the basis that the residential part of the site is now complete, the B1 part of the site is considered to be available for development in the short term. The applicant is seeking to vary the S106 to extend the time limit for delivering the employment element of the scheme. The site is currently being marketed and it is anticipated that development will start in 2018. However, as a result of the LPA not maintaining its 5 year housing land supply it is expected that the LPA will come under pressure to release this site for new residential development.
- 3.2.39 SP9(2) Land at Island Farm, Bridgend** – The site benefits from an outline planning application, P/08/1114/OUT, granted for mixed-use sport, leisure, commercial and offices on 14/03/12. P/14/824/RES – Highway infrastructure, green bridge and drainage infrastructure, was also granted on 12/06/15 at Island Farm. The infrastructure will enable the B1 part of this approved mixed-use, leisure led development to come forward. A further planning application, P/15/318/NMA has been approved for amendments to conditions relating to P/08/1114/OUT, to enable ecological mitigation to take place. HD limited has started work on site and are in the process of delivering the key infrastructure for the site including roads and drainage. The developer has provided a timescale of two years for the delivery of the Tennis Academy followed by the commercial part of the scheme.
- 3.2.40 SP9(1) Brocastle, Waterton** – Planning permission has been granted for a development of up to 71,441sq.m of B1, B2 and B8 employment floorspace, including access, car parking, diversion of public rights of way, site remediation, drainage, landscaping and associated engineering operations. The approved development complies with the Council's planning policies and will deliver national and local policy objectives of achieving a sustainable development by minimising impact on ecology and habitats, supporting existing green infrastructure and using the site's natural features to provide a layout that responds to its semi-rural location thus creating a high quality development. The development will also support inclusive access and active travel and provide connectivity to Bridgend Town Centre and links to the Vale of Glamorgan. Furthermore, the development can be designed to minimise its potential visual impact and any impacts on the amenity of those residents that adjoin the site (Planning application reference P/16/549/OUT refers). It is hugely positive that planning permission is in place and it is considered that this site is available for employment development in the medium term.
- 3.2.41 SP9(3) – Pencoed Technology Park** is also owned by Welsh Government. The site straddles the eastern administrative boundary of Bridgend and RCT. The site is identified and the focus of High Quality Life Sciences and manufacturing and is already the home of a number of high profile investments. Welsh Government have extended their ownership at the site by acquiring the brownfield former Sony land holding and are also in the process of acquiring a small land parcel in the Council's ownership. Substantial infrastructure is in place, including 'road stubs' to undeveloped parcels, including the land within Bridgend's administrative area, and the site is considered to be immediately available for development. In January 2017 planning permission was granted to NHS Wales for a change of use of the former Sanken Power Systems building to create a National Imaging Academy offering a state of the art facility to train Consultant Radiologists and ancillary office work space (planning application P/17/39/FUL refers). This site was chosen by the NHS for its strategic location in the heart of 'South Wales' and proximity to the strategic road network. The creation of National Academy is extremely positive as it demonstrates that the Technology Park is in the right location to attract new business but also has the potential to become a

hub for office headquarters for both the public and private sectors.

- 3.2.42** Also, in the context of 'City Deal' and a future Strategic Development Plan for SE Wales; Bridgend and RCT local planning authorities have had initial discussions regarding the potential of a wider Pencoed / Llanilid growth area that could deliver significant levels of high quality residential and employment land for the Cardiff Capital Region. This site could make a significant contribution to the employment element of such a growth area.
- 3.2.43** The LDP recognises that if Bridgend is to retain its competitive industrial base it is imperative that the area is able to offer a broad portfolio of sites. In addition to those Strategic sites identified and safeguarded under Policy SP9, Policy REG1 also identifies a variety of employment sites suitable for all types of employment uses of varying size and type.
- 3.2.44** In addition to identifying established employment sites, Policy REG1 also includes those employment areas which have vacant land for development for employment purposes and therefore have an important contribution to make in fulfilling the LDP Strategy. The remaining areas of vacant land on existing industrial estates collectively offer opportunities for investment for employment purposes whilst not frustrating the population and housing growth aspirations of the Plan.
- 3.2.45** Many of the sites listed in the policy also form parts of much larger regeneration or mixed-use sites additionally allocated by Policy PLA3. The development of these sites for employment purposes as part of much wider schemes containing other uses will help to create sustainable mixed use areas within existing communities, helping to facilitate the physical regeneration of the site and acting as enabling development to the delivery of the employment element, thereby improving the socio-economic regeneration of the wider area.
- 3.2.46** The current low take-up of employment land on REG1 and PLA3 sites is attributed to the fact that because of the considerable loss of industrial and business capacity that took place during the recession, most new employment activity is actively being taken up within existing vacant buildings and/or extensions on allocated employment sites rather than on new sites. Effectively the lost capacity as a result of recession is being regained before new take-up accelerates as the economy improves.
- 3.2.47** The failure of the LDP to meet Policy Target 19 for a third consecutive year is of concern to the LPA but is not a true reflection of what is happening in the real economy, where between 2016 to 2017 the number of people in employment increased. Data indicates that the number of small to medium sized enterprises in Bridgend is increasing at a quicker rate than for Wales as a whole. Collectively, this demonstrates that the expansion in business stock in Bridgend is continuing to improve albeit at a slower pace than previously predicted.
- 3.2.48** Contextual indicators and comparisons with other local authorities show that notwithstanding the low take up of employment land the 'real' economy is relatively buoyant and that the failure to meet this target is the result of the recent very deep recession and the regaining of previous lost capacity. The Council's Economic Development Section has highlighted that few empty units remain on the boroughs industrial estates and there is pent up demand for small to medium sized units. Bridgend retains its locational advantages for business and can expect higher levels of employment land take-up in the latter part of the Plan period. A formal review of policy will be undertaken during the statutory LDP review process.
- 3.2.49** It is reiterated that the amount of employment land allocated in the context of a regeneration-led strategy has not frustrated the population and housing growth aspirations of the Plan. Whilst the LDP monitoring target has not been met, the effects of the recession on South-east Wales and Bridgend must be given due consideration when determining the reasons as to why the development of vacant, allocated employment land has not occurred at the long-

term average rate of 6.33 hectares per annum. It is considered that the employment allocations and strategy in the LDP remain broadly sound but will be the subject of rigorous testing during the statutory LDP review.

### **Reconsideration of the LDP Strategy**

- 3.2.50** The inability to meet the adopted LDP's housing requirement and the resulting failure to maintain a 5 year housing land supply indicates that either additional housing sites are required or the level of housing growth required by the LDP's strategy will need to be reconsidered as part of a revision of the LDP. In addition, all undelivered housing allocations will need to be re-assessed to ensure that they remain viable and deliverable. This could result in existing housing allocations being removed from the LDP and new sites allocated.
- 3.2.51** In addition to considering the current proposed level of housing growth, the revision of the Plan will also need to consider the implications of an extended Plan period. The current Plan runs to 2021, any revised Plan is likely to extend to 2033. Extending the Plan period will result in a revised dwelling need and a requirement for new sites for both market and affordable dwellings. It will need to take account of the latest population and household projections and a revised Local Housing Market Assessment, as well as other updates to the evidence base. Consideration will also need to be given to the policy aspirations linked to the Cardiff Capital Region City Deal, together wider contextual matters.
- 3.2.52** These updates and issues will need to be thoroughly considered and addressed as part of the Plan revision process which cumulatively could result in a change to the Plan's strategy. In view of this, it is considered that the spatial strategy will need to be reviewed as part of the LDP revision process.

## **Review of Policies**

**3.3** The LDP policies have been reviewed having regard to the following:

- Findings of the three LDP Annual Monitoring Reports;
- Significant contextual changes that have occurred since the Plan's adoption, including changes in national policy and legislation; and
- Internal consultation with development management officers and other specialist officers, including housing, green infrastructure, heritage and economic development officers. Topic based officer working groups were established to discuss policy implementation, with consideration given to how policies are functioning/being implemented.

**3.3.1** A summary of the policy review assessment is set out in Appendix 2. This gives an overview of whether a policy/allocation is functioning effectively, whether any amendments are likely to be needed and whether any policies should be removed as part of the Plan revision process. The policy assessment undertaken to date is not considered to be definitive and further consideration will be given to the need to revise the Plan's policies as part of the revision process.

**3.3.2** The key policies that are considered likely to require amendment based on the policy review assessment are discussed in more detail below.

### **Housing and Site Allocations**

**3.3.3** As evidenced in the Annual Monitoring Reports, to date the adopted Bridgend LDP has not delivered the level of housing growth identified in the Plan which has resulted in a shortfall in the housing land supply. As part of the revision process consideration will, therefore, need to be given to the appropriate level of housing growth for the County over an extended Plan period. In addition, consideration will be given to adopted spatial strategy to determine whether it remains 'fit for purpose', having regard to wider policy aspirations associated with Cardiff Capital Region and Bridgend Well-Being Plan. Accordingly, it is anticipated that policies SP1 (Regeneration-Led Development – Spatial Distribution of Growth) will need to be revised to rectify the shortfall in housing land.

**3.3.4** In addition LDP Policy COM1 (Residential Allocations in the Strategic Regeneration Growth Areas) will need to be reviewed as part of the revision process. This will provide the opportunity for the LPA to assess and potentially reconsider undelivered housing allocations to ensure that they remain viable and deliverable which could result in existing allocations being removed from the replacement Plan. It will also be necessary to allocate additional deliverable and viable sites to meet the County's housing requirement over an extended Plan period.

**3.3.5** A detailed review of LDP Housing Allocations is set out in Appendix 2.

### **Open Space**

**3.3.6** The existing open space and accessible natural green space policies contained in the LDP were informed by the Bridgend Outdoor Sports Audit (2010) and Children's Playing Space Audit (2010) and Allotments Audit (2009).

**3.3.7** The evidence base identified deficiencies in the quantity and quality of existing provision in relation to the Fields in Trust Six Acre Standard adopted in the LDP. It is considered that in general the Plan's recreation and open space policies are functioning effectively in safeguarding existing recreation facilities and public open space and in securing provision of

new facilities in connection with new residential development in accordance with the adopted standards.

**3.3.8** Whilst there have been no contextual changes to national planning policy or TAN16: Sport, Recreation and Open Space (2009) since adoption of the Plan, Fields in Trust produced new guidance in 2017, 'Guidance for Outdoor Sport and Play: Beyond the Six Acre Standard.' This guidance, while retaining the same headline rates of provision as the original "Six Acre Standard", draws out new recommendations for accessibility, for flexible application of standards and the minimum dimensions of formal outdoor space. The revision of the guidelines also introduces benchmarking for informal open space not involving organised sport and play and includes parks and gardens and natural and semi-natural habitats. The amendments to the guidance do not result in a requirement to make modifications to current LDP standards as the TAN promotes evidence based locally generated standards. However, the revised recommended benchmark guidelines for both formal and informal outdoor space will be considered as part of the LDP revision process.

### **Retail**

**3.3.9** The overall aim of Strategic Policy SP10 is to focus and direct new retail, commercial and leisure developments within the County Borough Retail and Commercial Centres in order to maintain and protect their vitality and viability. A key strand of the LDP's Sustainable Regeneration-Led Spatial Strategy is to promote the County Borough's 3 main town centres as part of the LDP Vision, which seeks to create a successful regional employment, commercial and service centre in Bridgend, a vibrant waterfront and tourism destination in Porthcawl and a revitalised Maesteg.

**3.3.10** The Adopted LDP was informed by a retail needs planning study and subsequent update (2010) prepared by CACI. This evidence will need to be updated as part of the LDP revision process.

### **Town Centre Vacancy Rates**

**3.3.11** In order to measure how successful Policy SP10 is in directing appropriate new retail and leisure development to the County Borough's town and district centres to maintain their vitality and **viability** the monitoring framework looks at 3 Policy Targets relating to vacancy rates of commercial properties within town centres (Policy Target 21), the integrity of the Primary Shopping Streets within the town centres (Policy Target 22) and progress on the regeneration of key sites within the town centres (Policy Target 23).

**3.3.12** The annual monitoring target for Policy Target 21 is to ensure that the vacancy rates of commercial properties within the 3 town centres of Bridgend, Porthcawl and Maesteg remain below 15% throughout the plan period.

**3.3.13** The latest annual retailing and commercial centre survey indicates that:-

- Within Bridgend Town Centre of the 379 commercial properties surveyed 67 were vacant – representing a vacancy rate of 17.68%;
- Within Porthcawl Town Centre of the 204 commercial properties surveyed 10 were vacant – representing a vacancy rate of 4.90%; and
- Within Maesteg Town Centre of the 167 commercial properties surveyed 10 were vacant – representing a vacancy rate of 5.99%.

- 3.3.14** The LDP's strategic aim of maintaining and protecting the vitality and viability of town centres has not been partially met for the monitoring period 1st April 2016 to 31st March 2017 with respect to Policy Target 21. Whilst the monitoring target has only been marginally missed for Bridgend, further investigations are required. This issue will be scrutinised in detail during the statutory LDP review process where a comprehensive assessment of town centre policies combined with an updated 'Retail Needs Assessment' will provide clarity on the appropriate policy direction.
- 3.3.15** The annual monitoring target relating to Policy Target 22, to maintain the integrity of the Primary Shopping Frontages of Bridgend, Porthcawl and Maesteg is to ensure that 60% or more units are in A1 (Retail) use. The latest annual retailing and commercial centre survey indicates that:-
- Within Bridgend Town Centre of the 111 units within the Primary Shopping Frontages 67 were in A1 use – representing 60.36%.
  - Within Porthcawl Town Centre of the 95 units within the Primary Shopping Frontages 62 were in A1 use – representing 65.26%.
  - Within Maesteg Town Centre of the 85 units within the Primary Shopping Frontages 52 were in A1 use – representing 61.18%.
- 3.3.16** Data collected as part of last year's retailing and commercial survey highlighted that the proportion of Maesteg town centres' primary shopping frontages had fallen below the annual target for two consecutive years. However, the current data highlights a marginal improvement in the vacancy rates (61.18%) which means that the annual target has been met. Considering the current economic climate this data is very encouraging but will need to be considered in greater detail during the LDP Review to ensure this upwards trajectory.
- 3.3.17** The proportion of units occupied by A1 uses in Porthcawl's primary shopping frontages has increased from 63.16% to 65.26% which reflects the increasing number of tourists visiting Porthcawl. Conversely, whilst Monitoring Target 22 has been achieved, Bridgend town centre recorded a decrease in the number of units located in the Primary Shopping Frontage occupied by A1 uses for the third consecutive year. As such it is considered that further investigation is required to understand and action where further measures are required to limit further losses. This analysis will be combined with an update of the 'Retail Needs Assessment' (as part of the statutory LDP Review).
- 3.3.18** To mitigate against the tough economic conditions currently being experienced and to ensure the vitality of the County Borough's town centres, the Council has chosen to exercise sufficient flexibility when applying LDP Policy REG6 to allow changes of uses to non-A1 uses in Primary Shopping Frontages where an applicant can provide robust evidence to demonstrate that there is insufficient demand for A1 units and its loss would not materially dilute the continuity of the Primary Shopping Frontage. It is the view of this authority that permitting a small number of changes of uses is more conducive to sustaining the viability of the town centre rather than allowing empty units to stand idle.
- 3.3.19** A number of contextual changes to national planning policy have occurred since the preparation and Adoption of the LDP. Welsh Government have published a revised version of Chapter 10 of PPW and TAN4 (Retail and Commercial Development) in November 2016. These documents have been updated to reflect the Welsh Government's revised national planning policy for retailing and commercial development. The main areas of change include revised objectives for retail planning policy, stronger emphasis on the need for retail policies to be framed by a retail strategy in LDPs (complemented by masterplans and place plans to assist in the delivery of the strategy), a requirement for LDPs to set out a locally

derived hierarchy of centres and revised policies for dealing with new uses/centres undergoing change and a consistent approach to terminology. However, the policy requirement to consider retail and commercial centres first for retail and complementary uses remains, as do the requirements for retail need, sequential tests and impact assessments, where appropriate. The amendments to national policy do not result in a requirement to make modifications to current LDP policies; however, the revised guidance will be taken into account in the LDP revision process.

**3.3.20** A new Retail Study will be undertaken in order to inform the revised LDP. This study will provide an update of the retail expenditure forecasts for comparison and convenience retail for the County Borough. The purpose of a new retail study will be to provide comprehensive data and information on the current performance of the retailing and commercial centres and to provide an up-to-date assessment of retail expenditure capacity within the County Borough and identify capacity for comparison and convenience goods. This updated study will inform the Plan revision in terms of retail strategy, retail policies and LDP allocations.

### **Planning Obligations**

**3.3.21** LDP Strategic Policy S14 'Infrastructure' seeks to ensure that new development is accompanied by an appropriate level of infrastructure to assist in providing for sustainable communities. The policy is being delivered through the development management process. Contributions are being secured through the use of planning obligations, as set out in Section 106 of the Town and Country Planning Act 1990. Planning obligations seek contributions from developers to enhance the quality of a development, provide community benefits and infrastructure, and mitigate any negative impacts that may arise as a consequence of the development.

**3.3.22** The Council decided not to commence work on CIL following adoption of the LDP in 2013. Whilst this would have provided an alternative means of providing the necessary infrastructure to support development in the LDP, the view was taken that the LDP strategic sites could be delivered without the need for CIL as each site had specific infrastructure requirements that could be dealt with through a standard Section 106 legal agreement.

**3.3.23** The current policy is functioning effectively and contributions are being received (subject to viability considerations) to off-set the impacts of new development and help provide necessary infrastructure such as recreation and open space, community facilities, sustainable transport and education.

**3.3.24** Based on the dwellings that have been delivered by the Local Development Plan, since adoption, the following S106 contributions have been collected by the Council and used to help improve the lives of our residents:

- Affordable Housing £1,818,858
- Public Open Space £529,400
- Transport Infrastructure £754,000
- Education £1,924,934
- Miscellaneous £671,037

Total £5,698,229

Financial Value of S106 Agreements completed since Oct 2013 (LDP adoption)

**3.3.25** The LDP Review Process, however, will need to consider the most effective method of providing infrastructure to support development in the LDP.

### **Renewable Energy**

**3.3.26** The monitoring aim of Strategic Policy SP8 is to ensure that development proposals within the County Borough contribute to meeting national renewable energy efficiency targets. The Monitoring Framework sets out 3 targets (16, 17 and 18) to measure how effective the Plan has been in achieving this aim.

**3.3.27** Policy Target 16 requires that all major planning applications assess the potential for on-site renewable/low carbon energy technologies and this is measured by analysing whether each major application is accompanied by a renewable/low carbon energy assessment – this is a requirement of Policy ENV17. Of the ‘qualifying’ developments no major planning applications submitted (and granted) for the monitoring period 1st April 2016 to 31st March 2017 were accompanied by a ‘specific’ energy assessment. Successive AMRs demonstrate that the Council has failed to meet the requirements of monitoring target 16 however it must be recognised that energy efficiency in new development is achieved by strict adherence to Building Regulations. Nevertheless further investigation is required to understand and action where further measures are required to ensure compliance with the provisions of LDP Policy ENV17. This issue will be scrutinised in detail during the statutory LDP review process and consideration given as to whether the policy approach needs to be amended.

**3.3.28** Notwithstanding the fact that not all major planning applications have been accompanied by an Energy Assessment the Council has achieved its ‘interim target’ of producing an Energy Opportunities Plan SPG by 2014. The Council originally produced its Energy Opportunities Plan in November 2011 and this has been updated and subsequently been incorporated into the Sustainable Energy SPG adopted by Council on 2nd May 2014.

**3.3.29** The LPA is committed to ensuring that the County Borough contributes towards the country’s renewable energy requirements and is both disappointed and concerned that Policy Target 16 has not been met. However, the issue of ‘renewable energy’ has had its profile raised following the selection of two demonstrator schemes:- the Bridgend Town Heat Network and the Upper Llynfi Valley Heat Network (Caerau Minewater) Projects. The Caerau Minewater Heat Project was recently announced in August 2017 as the third prize winner in the NEA and British Gas Energy Impact Awards 2017-18. Bridgend CBC is working with the Energy Technology Institute (ETI) who is developing an Energy Path Networks tool which will identify the most cost-effective local energy systems (heat and power) for Bridgend to a lower carbon energy system as part of a Low Carbon Transition Plan. Acting as a catalyst for energy project investment in the Bridgend borough, the heat network projects SSH Programme has attracted additional studies to be carried out such as an analysis of the Bridgend Gas Network by Wales and West Utilities to inform the future of the gas debate, identifying opportunities for Community Renewable Energy Schemes in Rural Bridgend.

**3.3.30** The aim of Policy Target 17 is to increase the amount of energy produced in the County Borough from Renewable Sources in the County Borough. Success is judged by monitoring whether there has been an annual increase in the permitted or installed capacity of renewable electricity and heat projects.

**3.3.31** During the Monitoring Period 1st April 2016 to 31st March 2017 2.5 mw of renewable electricity capacity was permitted. The scheme approved relates to 1 Wind Turbine on land at Parc Stormy (planning application P/15/868/FUL refers) which represents an increase of 3.1% on last year’s figures. It is worth noting that during the Monitoring Period 1st April 2015 to 31st March 2016 78.4mw of renewable electricity capacity was permitted. The schemes approved

comprised an Anaerobic digestion facility for 30yr period at Parc Stormey Down Airfield; Biomass Power Station of 25 mw electric output; 12 Wind Turbines and Pant-y-Wal Farm, East of Ogmre Valley; Solar Photovoltaic Farm at Stormy Down and Electric Energy Storage Facility also at Stormy Down.

- 3.3.32** The LDP is therefore annually increasing the amount of energy produced from renewable source and is meeting Policy Target 17.
- 3.3.33** Policy Target 18 aims to generate 35MW of renewable energy within the refined Strategic Search Areas (SSAs) by 2021. Parts of Bridgend County Borough lie within the Strategic Search Area (SSA) for large scale wind energy projects outlined in TAN8. As part of a consortium, Bridgend County Borough carried out a refinement exercise in these areas in 2006. The refinement carried out by Ove Arup and partners, calculated the generation capacity of parcels of land, included in the SSA. For those 'refined' areas of the SSA in Bridgend County Borough the capacity was calculated as:-
- Zone 20 North East of Maesteg 19MW
  - Zones 31-34 North of Evanstown 31MW
- 3.3.34** During the Monitoring Period 1st April 2016 to 31st March 2017 no applications have been approved within the refined Strategic Search Areas (SSAs). However, it is important to note that within zones 31-34 the Council has already consented planning applications at Pant Y Wal and Fforch Nest wind farms totalling 35MW – thereby exceeding this capacity. All of this capacity is already installed and operational. It should be noted that Zone 20 was excluded from the capacity assessment on the basis of the operational Ffynon Oer wind farm in Neath Port Talbot. The Plan has therefore met its target with respect of the generation of 35MW of renewable energy by the end of the Plan period.
- 3.3.35** In addition the Pant Y Wal extension, comprising of an additional 10 wind turbines with a generating capacity of 3MW each was consented on 28/02/15. Although not located within the refined SSA boundary, the turbines are located immediately adjacent to it and within the wider SSA and will contribute an additional 30 MW of renewable energy capacity. As such the generating capacity from large-scale wind turbines (within and immediately adjacent to the refined SSA) is 65 MW. As such the County Borough is making a significant contribution to national renewable energy targets.
- 3.3.36** Welsh Government produced a revised version of the Renewable Energy Toolkit for Planners in September 2015. The update includes an additional section relating to how local planning authorities assess the potential for solar farm developments. The revised toolkit provides a methodology to assist in the production of Renewable Energy Assessments (REAs) and additional advice on how to translate the results of the REAs into the LDP evidence base and resulting policies. Local authorities are expected to undertake a proactive approach to all forms of renewable and low carbon energy generation and the revised LDP will, nevertheless, need to consider the revised Toolkit and address the additional requirements set out within the toolkit.
- 3.3.37** In addition the publication of the revised Toolkit, Welsh Government has provided further emphasis that Local Planning Authorities should utilise their REAs to inform policies, areas of search and allocations for local authority scale renewable energy schemes or, other low carbon technologies. Welsh Government suggest that the LDP consultation process should provide communities with the opportunity to identify suitable locations for renewable energy developments, meaning that such development can be guided to the most appropriate locations. Accordingly, the Plan's renewable energy evidence base will need to be updated and areas of search for local authority scale renewable energy explored through the LDP revision process to support carbon reduction targets and to mitigate climate change.

## Waste

- 3.3.38** The LDP Waste policies were prepared in the context of the South East Wales Regional Waste Plan (RWP) – First Review 2008 that identified an indicative capacity for Bridgend County Borough to be between 185,000 and 228,000 tonnes, equating to between 3 and 4 new in-building sites on between 707 – 11.9 hectares.
- 3.3.39** Strategic Policy SP7 aims to make provision for new waste treatment facilities to meet regional (and local) waste treatment needs. Strategic Policy SP7 identifies 5 sites where waste facilities will be favoured at Heol y Splott, South Cornelly, Brynmenyn Industrial Estate, Village Farm Industrial Estate, Brackla/Litchard Industrial Estate and Waterton Industrial Estate in order to satisfy regional and local demand. In addition, Waste proposals on other appropriate sites or land allocated for industrial purposes may also be permitted, provided the proposal meets the criteria set out in Policy ENV16 of the LDP.
- 3.3.40** Target 15 requires the availability of 7.7 to 11.9 hectares of land (or land consented for that purpose), on the ‘favoured’ sites set out in SP7.
- 3.3.41** At the monitoring date of 31st March 2017, the table below illustrates that 29.36 hectares of land remained available on SP7 sites. At the monitoring date of 31st March 2017, the table below illustrates that 29.36 hectares of land remained available on SP7 sites.

| LDP Policy Ref | Site   | Available land remaining (ha) |
|----------------|--|-------------------------------|
| SP7 (1)        | Land at Heol-y-Splott, South Cornelly          | 0.0                           |
| SP7 (2)        | Brynmenyn Industrial Estate, Brynmenyn         | 7.16                          |
| SP7 (3)        | Village Farm Industrial Estate, Pyle           | 2.83                          |
| SP7 (4)        | Brackla / Litchard Industrial Estate, Bridgend | 7.71                          |
| SP7 (5)        | Waterton Industrial Estate, Bridgend           | 11.66                         |
| <b>Total</b>   |  | <b>29.36</b>                  |

- 3.3.42** RWPs, however, no longer have effect and as such a re-write of national planning policy on waste was necessary to reflect the new waste policy context introduced through EU legislation.
- 3.3.43** Directive on Waste (2008/98/EC), the Waste Strategy for Wales, ‘Towards Zero Waste, June 2010 and the underpinning suite of waste sector plans, in particular the Collections, Infrastructure and Markets Sector (CIMS) Plan, June 2012. PPW, therefore, was amended in February 2014 (Edition 6) and a revised TAN21 issued. The revised PPW and TAN21 no longer require the preparation of RWPs. The general approach of the CIMS Plan has been to move away from land-take based calculations to an approach where the need for waste management facilities is expressed by future capacity in tonnes. As stated in Welsh Government Policy Clarification Letter CL-01-12, technology development has led to the potential for smaller, more dispersed facilities to be developed (more flexible, able to take advantage of niche opportunities). It has also led to the possibility of larger facilities being

developed to reflect economies of scale and reduce expenditure by businesses and local authorities on the management of their residual waste. The end result of this is that it is now more difficult to ascribe a value to an 'average facility' – and as such, area-based land-take calculations have become less applicable.

**3.3.44** The CIMS Plan describes the waste management framework considered to provide the best solutions to meet environmental, social and economic needs in Wales to 2050. Waste assessments contained within the CIMS Plan do not have to be repeated by local planning authorities at a regional or local level. However, monitoring needs to be carried out through voluntary co-operation at a regional level to inform decision making in future LDPs and in dealing with planning applications for waste. The regional monitoring work has resulted in the first Waste Planning Monitoring Report (WPMR) for South East Wales (April 2016). This concluded that the regional position was:

- There is no further need for landfill capacity within the South East region.
- Any proposals for further residual waste treatment should be carefully assessed to ensure that the facility would not result in overprovision.

Therefore, there is no current need for residual waste facilities in County Borough of Bridgend, although PPW (edition 6, paragraph 12.6.2) requires that the identification of suitable locations for sustainable waste management facilities should be considered as part of LDP preparation. PPW (paragraph 12.6.1) also requires that development plans should demonstrate how national waste policy, and in particular the CIMS Plan, along with any updated position adopted in the waste planning monitoring reports and any other form of waste management priorities relevant to its local area have been taken into account.

**3.3.45** Given the findings of the LDP AMRs and the South East Wales WPMR it is considered that there is no pressing need to revise the LDP strategic and site allocation waste policies. Any LDP Revision, however, should reconsider these policies to take account of current government guidance and the change of approach to waste planning away from area-based land-take calculations.

### **Minerals**

**3.3.46** The LDP Minerals policies were prepared in the context of the Regional Technical Statement (RTS) of the South Wales Regional Aggregates Working Party (SWRAWP) (October 2008).

**3.3.47** Strategic Policy SP6 aims to provide a contribution to national, regional and local demand for a continuous supply of minerals. LDP Policy Targets 13 and 14 have a particular focus on monitoring whether the LDP maintains a minimum landbank for aggregates (Policy Target 13) and also safeguarding against permanent sterilising development within mineral buffer zones and mineral safeguarding areas (Policy Target 14).

**3.3.48** Policy Target 13 specifically requires the maintenance of a minimum 10 year aggregate landbank throughout the plan period within the County Borough. The latest SWRAWP Annual Report calculates the 10 year aggregate landbank as 70 years. As such the LDP is meeting its target of providing a minimum 10 year supply.

**3.3.49** There is no pressing need, therefore, to revise Policy SP6, however, any future LDP revision should reconsider this policy to take account of changes in government guidance and any updated regional position.

## Transport

**3.3.50** Policy Target 8 monitors the schemes set out by Policy PLA7 against the delivery timetable of the Regional Transport Plan (RTP). However, since the LDP was adopted in September 2013, the Regional Transport Plan (RTP) has been replaced by Bridgend's Local Transport Plan (LTP) 2015-2030, and the various schemes included within Policy PLA7 have been 're-set' accordingly.

**3.3.51** A number of 'rail' proposals included within Policy PLA7, relating to improvements to the capacity of the Maesteg – Bridgend Railway line and a new railway station at Brackla, are now investment proposals reserved for the Welsh Government, and not the LTP. Welsh Government are now the coordinating body for investment in all railway related matters, including all new rail services, rail infrastructure and railway stations.

**3.3.52** Walking and Cycling Schemes included within the new Phase 1 LTP programme, up to 2021 are:-

- PLA7(2) – Improved links to the National Cycle Network in the Vale of Glamorgan;
- PLA7(4) – Bridgend and Pencoed (which is financed and programmed for implementation before the end of 2016);
- PLA7(7) – Bridgend and Designer Outlet at Junction 36 of the M4 (the middle section of which could be secured by S106 funding); and

**3.3.53** In terms of highway schemes:-

- PLA7(25) – Improvements to A4063 between Sarn and Maesteg is programmed for delivery up to 2021 in the LTP.

**3.3.54** All remaining proposals included within Policy PLA7 have been re-scheduled within the LTP, and fall for delivery beyond the LDP Plan period. Notwithstanding this, all of the proposals remain valid and could be implemented earlier should there be further changes to investment decisions or assisted by Section 106 infrastructure

**3.3.55** Further consideration will be given to the policy/land use implications of the transport schemes identified in the LTP, as well as any updates to the LTP, as part of the LDP revision process.

**3.3.56** Consideration will also be given to the policy/land use implications of the Cardiff Capital City Region South East Wales Metro proposals in the Plan revision process. The Metro proposals seek to improve transport connectivity across the region which is integral to achieving wider economic and social outcomes for South East Wales.

**3.3.57** The Active Travel (Wales) Act 2013 requires local authorities in Wales to produce active travel maps and deliver year on year improvements in active travel routes and facilities. The LTP identifies Active Travel Network schemes for each of the County's towns which propose the development and implementation of active travel plans for these areas. In terms of implications for the revised LDP, any new or amended proposals for active travel routes and facilities, especially for walking and cycling, may be considered for safeguarding through the LDP revision process where they are within a programme, supported by funding and likely to be delivered in the Plan period.

## **Supplementary Planning Guidance**

**3.3.58** Following the LDP's adoption a number of supplementary planning guidance documents have been prepared to support existing LDP policies:

- SPG 12 – Sustainable Energy (May 2014)
- SPG 13 – Affordable Housing (October 2015)
- SPG 19 – Biodiversity and Development (July 2014)
- SPG 20 – Renewables in the Landscape
- SPG21 – Safeguarding Employment Sites (June 2015)

**3.3.59** A review of the existing SPG including ones recently amended and adopted will be undertaken as part of the LDP Revision process with amendments to a number of these likely to be required.

### **Proposals Map and Constraints Map**

**3.3.60** The form and content of the LDP Proposals Map will require changes as part of the LDP Review to reflect any changes to the plan.

**3.3.61** The LDP Constraints Map contains designations that are not directly proposals of the LDP but are constraints to development created by legislation or other mechanisms outside of the LDP process such as Flood Risk Areas, Conservation Areas, SSSI's, etc. The printed Constraints Map for the LDP represents a point in time and includes a number of designations particularly flood risk areas that have been updated since adoption of the LDP and therefore it is out of date. Going forward it is likely that the Constraints Map will be produced in an electronic form with public access that will allow for it be updated as necessary.

## 4.0 Future LDP Evidence Base Requirements

4.1 To inform the review of the LDP there will be a need to update various elements of the evidence base that informed the current Local Development Plan which expires in 2021 as well as taking into account any contextual or policy changes that have occurred since adoption of the plan. A sample of the evidence base studies required to inform the LDP are provided below:

- **Population & household forecasts** – to provide estimates of the future numbers of households and of the numbers of people who live in them, which will inform the LDP's dwelling requirement.
- **Local Housing Needs Assessment** - to identify how many homes are required of each tenure: open market housing and 'affordable housing' (e.g. shared ownership or social rented housing).
- **Sustainable Settlement Hierarchy** –to provide analysis on the role and function of settlements in Bridgend County Borough
- **Settlement Boundary Review** – to define clear, defensible boundaries around settlements in the form of 'settlement boundaries'.
- **Employment Land Review Update** – to identify the county borough's employment land requirements for the LDP period and to assess the quality of the main employment areas for continued use, and identify potential new land to meet future requirements for all employment sectors.
- **Affordable Housing Viability Assessment** – to provide advice on achievable and viable targets and thresholds for affordable housing.
- **Gypsy and Traveller Accommodation Needs Assessment** – to identify local need.
- **Bridgend Town Centre Flood Risk Assessment** – to identify areas at risk of flooding.
- **Retail Study Update** –to identify the requirements of retail need, including the need for more land and floorspace.
- **Public Open Space Audit** – to identify local needs for a range of open spaces including for sport and play.
- **Landscape Character Assessment** - to describe the characteristics of the local landscape and which may include guidelines for development.
- **Renewable Energy Assessment** – to provide a robust Renewable Energy evidence base; and
- **Transport Assessment** – to assess the impact of the scale and distribution of development detailed in the emerging Local Development Plan.

4.2 The above is not a definitive list and additional evidence base update requirements may emerge as plan revision progresses. There are number authorities in South-east Wales who are currently in the process of considering reviewing their Local Development Plans on the basis that their current plans expire at the end of 2021. This presents an opportunity for collaboration including the preparation of a shared evidence base.

## **Sustainability Appraisal including Strategic Environment Assessment**

- 4.3** A requirement of the LDP process is that Sustainability Appraisal (SA) incorporating Strategic Environmental Assessment (SEA) informs preparation of the LDP. The SA/SEA process is integral to the development of the LDP to ensure the policies in the LDP promote Sustainable Development through integration of the key economic, environmental, social and cultural objectives in the development of the LDP policies and proposals and take account of any significant effects on the Environment. The SA/SEA has been an iterative process throughout preparation of the LDP and policies and proposals in the LDP reflect this.
- 4.4** SA monitoring of the Sustainability Appraisal Objectives is undertaken on an annual basis and reported through the LDP Annual Monitoring Report. This enables the Council to assess the extent to which the LDP is contributing to the achievement of sustainable development and to identify any concerns. To inform the review of the LDP it will be necessary to revisit and update the environmental, social and economic baseline information, along with the review of relevant plans policies and program. The SA Monitoring Framework including the SA Objectives will need to be reviewed to ensure this remains up to date, and this will include considering whether the methodologies need revising due to changes in legislation.

## **Habitats Regulations Assessment**

- 4.5** The LDP was informed by Habitats Regulations Assessment (HRA), the purpose of which is to assess the impacts of a land use plan, in combination with the effects of other plans and projects, against the conservation objectives of internationally important European sites of nature conservation importance such as Special Areas of Conservation and Special Protection Areas (designated for their ecological status) and to ascertain following screening what needs Appropriate Assessment (AA). As part of the review of the LDP the HRA will need to be reviewed.

## **Opportunities for Collaboration**

- 4.6** As part of the review process, consideration will be given to opportunities to work collaboratively with neighbouring authorities on updating key areas of the evidence base. The regional planning group SEWSPG is already facilitating joint work to develop a regional evidence base in the form of Task and Finish Groups. This includes: Retail, Housing and population, Sustainable settlement appraisals, Employment and Candidate Sites Assessment. Bridgend is contributing to this work and will inform the LDP preparation process.

## 5.0 The LDP Review Options

### Joint LDPs and Joint Working

- 5.1** The Welsh Government's recent White Paper<sup>11</sup> sets out its commitment to reforming local government in Wales. The paper proposes regional working in many areas of local government, including land use planning. A Local Government Bill is expected to be introduced into the Assembly in 2018 to give effect to these proposals, including a mandate for Strategic Development Plans (SDP).
- 5.2** On 13 December 2017 the Cabinet Secretary for Energy, Planning and Rural Affairs wrote to the Leader and Chief Executive inviting this Council to give serious consideration to preparing a Joint Local Development Plan (JLDP) with other Local Planning Authorities within the South East Wales – West Area (comprising Bridgend, RCT and Caerphilly).
- 5.3** Bridgend County Council supports cross boundary working and is committed to exploiting these opportunities in collaboration with the region in a positive fashion, however, the 'size' and complexity of such a large and diverse Joint LDP area, encompassing RCT, Caerphilly and Bridgend presents many challenges and could overly complicate and hinder continuous plan coverage proceeding in a timely manner and reduce the ability of the planning system to deliver 'effective planning outcomes'.
- 5.4** Therefore, in order to determine the most appropriate way forward for this Council to maintain up-to-date development plan coverage, a number of 'realistic options' have been tested, to determine their impact on a range of planning outcomes. The planning outcomes considered relate to:
- Continuous plan coverage;
  - Housing delivery (including affordable housing delivery);
  - S106 contributions;
  - Dealing with strategic infrastructure issues;
  - Dealing effectively with cross-boundary issues;
  - Impact on a future SDP;
  - Preparing a sound evidence base;
  - Spatial coherence; and
  - Planning certainty & investor confidence
- 5.5** With respect to these planning outcomes, the following 'realistic' options were considered:-
- Option 1: Local Planning Authorities in the region prepare a SDP only and forego individual reviews of their respective LDPs until the SDP is adopted;
  - Option 2: An individual review of Bridgend's LDP whilst simultaneously working collaboratively with the region to prepare a SDP;
  - Option 3: Collaboration 'Plus' (an individual review of Bridgend's LDP whilst simultaneously working collaboratively with RCT (& other LPAs) to prepare a joint evidence base and with the region to prepare a SDP;
  - Option 4: Joint Local Plan (incorporating Caerphilly, RCT & Bridgend) whilst simultaneously working collaboratively with the region to prepare a SDP; and
  - Option 5: Joint Local Plan (Incorporating RCT & Bridgend) whilst simultaneously working

collaboratively with the region to prepare an SDP.

- 5.6** The following section summarises Bridgend County Borough Council's formal response (attached as Appendix 6) to the Cabinet Secretary, which was sent on 28<sup>th</sup> February 2018.
- 5.7** **Option 1: Local Planning Authorities in the region prepare a SDP and forgo individual reviews of their respective LDPs.** Bridgend County Borough Council supports the preparation of a SDP to provide a regional spatial framework for the future development and use of land. However, from a Bridgend perspective, Option 1 presents a significant 'risk' of a 'policy vacuum' for this Authority. Whilst it has been suggested that an SDP could be adopted as soon as 2022, in reality, given that this is a new and untested process, building and maintaining a political consensus and establishing fair and effective governance is likely to delay the adoption of the SDP until at least 2023 and in a worst case scenario 2024. This would leave a period of 2-3 years where Bridgend LPA has a policy vacuum. Furthermore, a relaxation of the plan's end-date (which is also being presented as a solution to avoid a potential policy vacuum by LPAs in the region) beyond 2021 would not provide a temporary solution for Bridgend until such time as a SDP is adopted. Bridgend's LDP has been very successful in delivering a substantial element of its allocated sites and there is an imperative to produce a new plan as soon as possible to replenish housing and investment opportunities and maintain housing delivery, which is an objective of the Welsh Government.
- 5.8** **Option 2: An individual review of Bridgend's LDP whilst simultaneously working collaboratively with the region to prepare an SDP; and**
- 5.9** **Option 3: Collaboration 'Plus' An individual review of Bridgend's LDP whilst simultaneously working collaboratively with RCT (& other LPAs) to prepare a joint evidence base and with the region to prepare a SDP.** Options 2 and 3 would be a relatively simple and 'quick-fix' solution to avoid a policy vacuum in Bridgend post 2021. In essence both options would involve a relatively straight forward refresh of the existing evidence base and identification of new allocations. In the case of 'Collaboration Plus' there would be the opportunity to share evidence base studies with RCT and other LPAs as part of the wider collaboration agenda, substantially reducing the duplication of work and in theory resulting in financial savings.
- 5.10** In the scenario that a SDP is progressed more expediently than expected, work being undertaken to review the Bridgend LDP, could be utilised to prepare a LDP 'Lite'. This would be achievable as the evidence base used to prepare the SDP will be the predominantly the same as the Bridgend LDP Review.
- 5.11** **Option 4: Joint Local Plan (Incorporating Caerphilly, RCT & Bridgend) whilst simultaneously working collaboratively with the region to prepare a SDP and**
- 5.12** **Option 5: Joint Local Plan (Incorporating RCT & Bridgend) whilst simultaneously working collaboratively with the region to prepare a SDP.** Option 4 requires Bridgend (CBC) to prepare a joint LDP with Caerphilly and RCT and Option 5 with RCT (CBC) only. In theory, both options are achievable. However, the practicalities and potentially lengthy timescales involved in setting up and preparing such a large LDP requires further consideration. Although there are planning merits to working at such a scale, there are undoubtedly practical and logistical issues that could take a considerable time to resolve. For example, establishing a Joint Planning Board or determining alternative suitable governance

arrangements, aligning political differences and Officer working practices. It is the view of Bridgend County Borough Council that the benefits of a larger scale footprint to resolve cross-boundary issues should be fully exploited at the SDP regional scale and not at a sub-regional level of Bridgend/RCT and Caerphilly only. Option 5 would face similar issues as Option 4 however, by virtue of only having one partner the logistical practicalities and political differences would, in theory, be easier to align and manage.

- 5.13** In view of the concerns raised above it is unlikely that a joint LDP on the footprint proposed could be adopted by 2021, therefore, undermining full plan coverage and subsequently resulting in a policy vacuum for Bridgend with all the associated negative planning outcomes that such a situation would result in. Neither would a relaxation of the plan's end date beyond 2021 be an acceptable temporary solution for Bridgend until such time as a new joint LDP is in place.

*Why would a relaxation of the plan's end date beyond 2021 be problematic?*

- 5.14** Firstly, the evidence that underpins the strategy and policies would also be out of date and could easily be challenged by developers resulting in a situation of 'planning by appeal'. Secondly, the recently published 2017 JHLAS shows that the County Borough has a housing land supply, assessed against the housing requirement of the Bridgend LDP, of 4.0 years. Where the land supply is less than 5 years, TAN1 states that local planning authorities should consider the reasons for the shortfall and whether the LDP should be reviewed either in whole or in part. It is considered that the most effective way of rectifying this issue is through an early review/revision of the adopted LDP given the importance attached to the land supply issue.

*Why is the 'land supply' issue so important for Bridgend?*

- 5.15** In respect of Bridgend, the Annual Monitoring Report evidences that the LDP has been successful in terms of the implementation of the plan's regeneration-led spatial strategy and bringing forward and delivering development sites and opportunities, especially for housing. The housing land supply has only recently fallen below the TAN1 5 year requirement and the current 4 year supply, set against the fact that there is less than 4 years remaining in the plan period is a reasonable position that emphasises that the existing LDP has been successful but also highlights the need to replace the LDP as expediently as possible.

*What happens if we don't identify new sites?*

- 5.16** The absence of an early LDP Review (which puts in place a replacement plan by 2021) resulting in a policy vacuum, up until either a new joint LDP or SDP is adopted, combined with the lack of 5 years housing land supply based on the fact the majority of LDP housing allocations have been delivered (rather than viability issues) would be ruthlessly exploited by the development industry. There would be significant pressure to release greenfield sites in unsustainable locations and the potential situation of 'Planning by Appeal'. Such a position will result in highly negative planning outcomes which will needlessly divert staff resources and have the potential to undermine a future underlying strategy associated with the SDP.

- 5.17** With a consensus from the region to prepare an SDP, the need for a joint LDP requiring a new evidence base, vision and land-use strategy (a sub-regional approach to planning) is considered unnecessary, unlikely to achieve better planning outcomes and would be a

significant distraction from the agreed goal of establishing joint regional working arrangements and governance to facilitate preparation of the SDP. Also, in the context of the wider Local Government Re-organisation agenda a joint plan area incorporating Caerphilly, RCT and Bridgend would also encompass 3 separate Health Boards – ABM, Cwm Taff and Aneurin Bevan, which is not logical and could present difficulties in alignment and engagement in the joint LDP preparation process.

- 5.18** A scenario where a policy vacuum exists when the current LDP expires in 2021 presents the most significant threat to Bridgend. A relaxation of the plan's end date beyond 2021 would not be a temporary solution for Bridgend until such time as a new 'joint LDP' or the 'SDP' is in place. This authority has always had 'Development Plan' coverage and, as per the Cabinet Secretary's requirements, it is imperative that this is not compromised.
- 5.19** The most appropriate way forward that responds to local issues, maintains plan coverage and delivers the best planning outcomes, is to proceed immediately with a review and replacement of Bridgend's existing LDP (whilst simultaneously working collaboratively with our neighbours and with the region on the SDP), wherever possible sharing a joint evidence base.
- 5.20** On the 29<sup>th</sup> March 2018 the Cabinet Secretary wrote to the Leader of Bridgend County Borough Council permitting the LPA to submit its Delivery Agreement to Welsh Government for approval.
- 5.21** The benefits of working much closer with our neighbouring Councils is accepted and meetings have already been held at officer level to identify areas where we can work jointly to better manage resources, ensure a consistent evidence base, remove duplication and waste, share data, and utilise common methodologies. Significant work is already progressing via the South East Wales Strategic Planning Group (SEWSPG) to agree common methodologies for use across the Cardiff Capital Region. To this end, and in addition to the current SEWSPG collaboration, we will be proposing closer liaison/collaboration with those authorities who wish to review their LDP at the current time, including a shared evidence base for key topics. However, each Council will need to ultimately maintain control over timing and governance to responsibly manage the risk of no Plan coverage.

## **6.0 LDP (2013) Draft Review Report: Public Consultation**

- 6.1** A statutory review of the Bridgend Local Development Plan (LDP) commenced in 2017, the first stage being the publication of the Draft Review Report which was subject to a four week stakeholder consultation period commencing Monday 30 April 2018 until 5pm Friday 25 May 2018.
- 6.2** The Draft Review Report was accompanied by an official comments form that included the following five questions and an opportunity to provide additional comments if required:
- Q1. Does the Review Report identify all the key contextual issues to be considered in the review of the LDP?
  - Q2. Does the existing LDP Vision & Objectives remain appropriate for a Revised Plan?
  - Q3. Do you agree that the existing LDP Regeneration-Led Spatial Strategy needs to be reviewed?
  - Q4. Does the Review Report identify the policies that are likely to need changing in the Revised Plan?
  - Q5. Does the Review Report identify the most appropriate revision procedure to prepare a Revised Plan and whether the Review should be undertaken individually or jointly?
- 6.3** The LPA received 11 consultation responses. A summary of the key issues raised in relation to the questions on the Draft Review Report and the LPA's response is attached at Appendix 7.

## **7.0 Conclusions: What Form of Plan Revision is Required?**

### **7.1 Recommendation**

- 7.2** The primary functions of a Review Report are to determine the appropriate procedural route and key issues to be considered when taking the existing LDP forward.
- 7.3** In terms of 'procedural route', in the case of Bridgend, the plan is already the subject to a statutory required 4 year full review, and as such all aspects of the plan will need to be assessed to consider if they remain sound and fit for purpose. This will include the LDP vision, objectives, spatial strategy, policies and land-use allocations, broadly following the same preparation process and stages as the original plan.

## Appendix 1: Summary of LDP Policy Review

The following section details the initial findings of the review of the LDP Policies in order to identify if they are functioning effectively, whether any changes are likely to be required and if relevant should be considered for removal as part of the plan review process. The assessment is outlined in the table below.

| Strategic Policies |   | Commentary   |
|--------------------|---|--|
| SP1                | Regeneration-Led Development                            | Revise as necessary to reflect reconsideration of the spatial strategy over extended plan period. Amendments are likely to be required in response to the Officer / Member Groups, evidence and public consultation. These will be considered as part of the LDP revision process. |
| SP2                | Design and Sustainable Place Making                     | Functioning effectively – amendments may be required to reflect contextual changes, updated legislation and national planning policy.  |
| SP3                | Strategic Transport Planning Principles                 | Functioning effectively – amendments may be required to reflect contextual changes, updated legislation (such as the Active Travel Act 2015) and national planning policy.   |
| SP4                | Conservation and Enhancement of the Natural Environment | Functioning effectively – amendments may be required to reflect contextual changes, evidence, updated legislation and national planning policy.  |
| SP5                | Conservation of the Built and Historic Environment      | Functioning effectively – amendments may be required to reflect contextual changes, evidence, updated legislation and national planning policy.  |
| SP6                | Minerals  | Functioning effectively – amendments may be required to reflect contextual changes, evidence, updated legislation and national planning policy.  |
| SP7                | Waste Management  | Functioning effectively – amendments may be required to reflect contextual changes, evidence, updated legislation and national planning policy.  |
| SP8                | Renewable Energy  | Amend to reflect changes in national renewable energy policy and to support carbon reduction targets to mitigate climate change.   |
| SP9                | Employment and the Economy                              | Revise to reflect the findings of the Employment Land Review update, emerging CCR evidence, overall development strategy and changes in national policy.   |
| SP10               | Retail and Commercial Hierarchy                         | Revise to reflect any change in approach to town centres and updated retail requirements over an extended plan period and changes in shopping patterns and habits. In addition any revision to the policy will need consider emerging CCR evidence.                                |
| SP11               | Tourism   | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| SP12               | Housing   | Revise as necessary to reflect reassessment of the spatial strategy over the revised plan period. Amendments are likely to be required in response to the Officer / Member Groups, evidence and public   |

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|------|---------------------------------|--|
|      |                                 | consultation. These will be considered as part of the LDP revision process.  |
| SP13 | Social and Community Facilities | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.                         |
| SP14 | Infrastructure                  | Functioning effectively –amendments may be required to reflect the latest viability evidence, contextual changes and updated national planning policy. |

| Development Management Policies |  | Commentary   |
|---------------------------------|--|--|
| PLA1                            | Settlement Hierarchy and Urban Management                  | Revise as necessary to reflect reconsideration of the spatial strategy over an extended plan period. Amendments likely to be required in response to the Officer / Member Groups, latest evidence and public consultation. These will be considered as part of the LDP revision process.     |
| PLA2                            | Implementation of Regeneration Strategies                  | Functioning effectively – however, this policy will need to be reconsidered to reflect the revised spatial strategy.   |
| PLA3                            | Regeneration and Mixed Use Development Schemes             | Revise as necessary to reflect reconsideration of the spatial strategy over an extended plan period. Amendments are likely to be required in response to The Officer / Member Groups, latest evidence and public consultation. These will be considered as part of the LDP revision process. |
| PLA4                            | Climate Change and Peak Oil                                | Functioning effectively –revise to reflect contextual changes and updated national planning policy.  |
| PLA5                            | Development in Transport Corridors                         | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.  |
| PLA6                            | Development West of the Railway Line, Pencoed              | Functioning effectively.   |
| PLA7                            | Transportation Proposals                                   | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.  |
| PLA8                            | Development Led Improvements to the Transportation Network | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| PLA9                            | Development affecting Public Rights of Way                 | Functioning effectively.   |
| PLA10                           | Safeguarding of Disused Railway Infrastructure             | Functioning effectively.   |
| PLA11                           | Parking Standards  | Functioning effectively.   |
| ENV1                            | Development in the Countryside                             | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation updated national planning policy and to accommodate any future changes to the spatial strategy.  |
| ENV2                            | Development in Green Wedges                                | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation  |

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|-------|---|---|
|       |   | updated national planning policy and to accommodate any future changes to the spatial strategy.   |
| ENV3  | Special Landscape Areas                         | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation updated national planning policy and to accommodate any future changes to the spatial strategy.                         |
| ENV4  | Local/Regional Nature Conservation Sites        | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation updated national planning policy and to accommodate any future changes to the spatial strategy.                         |
| ENV5  | Green Infrastructure                            | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV6  | Nature Conservation                             | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV7  | Natural Resource Protection and Public Health   | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV8  | Heritage Assets and Regeneration                | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV9  | Development in Mineral Safeguarding Areas       | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV10 | Development within Mineral Buffer Zones         | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV11 | Mineral Development                             | Revise to reflect most up-to-date Regional Technical Statement.   |
| ENV12 | Coal Extraction Operations                      | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV13 | Unstable Land                                   | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV14 | Inert Waste                                     | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV15 | Waste Management in New Development             | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV16 | Commercial and Industrial Waste                 | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy.   |
| ENV17 | Renewable Energy and Low/Zero Carbon Technology | This is the third consecutive year that the Council has failed to meet the requirements of monitoring target 16. Therefore, further investigation is required to understand and action where further measures are required to |

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|       |   | <p>ensure compliance with the provisions of LDP Policy EN17. In this respect consideration will need to be given to promote the requirement to submit Energy Assessments with planning applications and to promote this requirement as part of the planning application validation process. This issue will be the subject of rigorous testing during the statutory LDP review that will commence in early 2018.</p> <p>Amend to reflect changes in national renewable energy policy and to support carbon reduction targets to mitigate climate change.</p> |
| ENV18 | Renewable Energy Developments                                     | Amend to reflect changes in national renewable energy policy and to support carbon reduction targets to mitigate climate change.   |
| REG1  | Employment and the Economy  | Revise as necessary to reflect findings of Employment Land Review, emerging evidence from the CCR Employment Group and overall development strategy. Amendments may be required to reflect changes in national policy.   |
| REG2  | Employment Sites  | Revise as necessary to reflect findings of Employment Land Review, emerging evidence from the CCR Employment Group and overall development strategy. Amendments may be required to reflect changes in national policy.   |
| REG3  | Protection of Identified Employment Sites                         | Functioning effectively – Revise as necessary to reflect findings of Employment Land Review, emerging evidence from the CCR Employment Group and overall development strategy. Amendments may be required to reflect changes in national policy.   |
| REG4  | D2 Class Uses on Employment Sites                                 | Functioning effectively – minor amendments may be required to reflect contextual changes, legislation and updated national planning policy (subject to monitoring)   |
| REG5  | Local Retailing and Commercial Development                        | Amend and revise as necessary to reflect revised retail strategy and capacity figures for the town centres.  |
| REG6  | Primary Shopping Frontages  | Revise to reflect any change in approach to town centres and updated retail requirements over an extended plan period.   |
| REG7  | Non A1, A2 and A3 Uses Outside of Primary Shopping Frontages      | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| REG8  | Control and Exclusion of Uses in Retailing and Commercial Centres | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| REG9  | Development Sites in Retail and Commercial Centres                | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| REG10 | Existing Retail Development Outside of Retailing and              | Functioning effectively – minor amendments may be required to reflect contextual changes and updated   |

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|       | Commercial Centres  | national planning policy.  |
| REG11 | New Bulky Goods Retail Development Out of Centre Retail Development Sites | Functioning effectively – revise subject to updated evidence base.   |
| REG12 | New or Extended Tourist Facilities, Accommodation and Attractions         | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| REG13 | Protection of Existing Tourist Accommodation                              | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| COM1  | Residential Allocations in the Strategic Regeneration Growth Areas        | Revise as necessary to reflect reconsideration of the spatial strategy over extended plan period. Amendments are likely to be required in response to the Officer / Member Groups, evidence and public consultation. These will be considered as part of the LDP revision process. |
| COM2  | Residential Allocations Outside the Strategic Regeneration Growth Areas   | Revise as necessary to reflect reconsideration of the spatial strategy over extended plan period. Amendments are likely to be required in response to the Officer / Member Groups, evidence and public consultation. These will be considered as part of the LDP revision process. |
| COM3  | Residential Re-Use of a Building or Land                                  | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| COM4  | Residential Density   | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| COM5  | Affordable Housing  | Revise as necessary to reflect reconsideration of strategy, updated viability evidence and affordable housing requirements.  |
| COM6  | Gypsy and Traveller Sites   | Functioning effectively – minor amendments may be required to reflect legislation, contextual changes and updated national planning policy.  |
| COM7  | Protection of Social and Community Facilities                             | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| COM8  | Provision of Health and Well-Being Facilities                             | Functioning effectively – minor amendments may be required to reflect, legislation, contextual changes and updated national planning policy.   |
| COM9  | Provision of Community Buildings  | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| COM10 | Provision of Educational and Training Facilities                          | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |
| COM11 | Provision of Outdoor Recreation Facilities                                | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy.   |

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| COM12 | Provision of Playing Fields  | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy. |
| COM13 | Provision of Accessible Natural Greenspace (including public open space) | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy. |
| COM14 | Provision of Allotments and Community Food Networks                      | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy. |
| COM15 | Provision of Cemeteries  | Functioning effectively – minor amendments may be required to reflect contextual changes and updated national planning policy. |

## Appendix 2: LDP Site Allocation Review

- 1.1 The following provides an assessment of each of the individual site allocations in respect of their implementation to be considered as part of a review of the LDP.
- 1.2 **North East Bridgend (Parc Derwen) COM1(1)** This site is located 1.5 km to the north of Bridgend town centre and south of Junction 36 of the M4 and is allocated in the LDP for 1,515 residential units, a new school, local retailing and associated community facilities. Development is ongoing on this strategic allocation (Persimmon Homes and Taylor Wimpey). Whilst considerable progress has been made on this site with 1185 units delivered to date, progress has been slower than anticipated largely attributable to the slow housing market and wider economic conditions. The remaining 330 units will be built out by 2021 which is broadly consistent with the phasing of development schedule set out in the LDP.
- 1.3 **North East Brackla Regeneration Area COM 1(2)** The Site forms part of the North East Brackla Regeneration Area which is allocated as a mixed-use regeneration scheme accommodating an estimated 550 new dwellings together with commercial and recreation facilities to serve the new community, the industrial estate, the village of Coity and the wider residential community of Brackla to the south. A Development Brief has been approved to provide a planning policy document to guide a phased development of the land. Lync Cymru has already completed 99 affordable housing units on the eastern part of the site. The western portion of the site benefits from a recent consent for 220 units, 12 of which will be affordable being developed by Persimmon. The eastern part of the site also benefits from consents for 239 dwellings being developed by Taylor Wimpey. It is accepted that progress has been slow than expected largely due to market conditions. The agreed JHLAS (2017) forecasts the site to deliver the remaining 459 units from 2017 to 2021 which is broadly consistent with the phasing of development schedule set out in the LDP.
- 1.4 **Parc Afon Ewenni COM 1(3)** Parc Afon Ewenni is a significant brownfield and underutilised employment site which stretches along the A473 corridor from the residential area of Waterton in the east to Waterton Roundabout in the west. The proposed mixed-use development of the Parc Afon Ewenni Site represents an opportunity to build a viable and more sustainable community at Waterton, which is currently isolated, by accommodating additional residential development served by a commercial hub, community and recreation facilities. The site is subject to a flexible development framework that will deliver future residential, commercial and business space. A planning application was approved for the construction of up to 240 residential units, 1123 sq m of A1/A2/A3/D1/D2 development, public open space and highway works in 2015 (application P/15/368/OUT refers). There have been a number of landowner and S106 issues that have now 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 2<sup>nd</sup> March 2018. Access arrangements have now been clarified for the site and the Council is finalising a development brief to bring forward a development for up to 200 dwellings in the eastern most part of the site. A recent meeting with South Wales Police has provided a new time-line for the release of their Waterton Site in phases from now until 2019. The new strategy entails early disposal of Waterton to fund rationalisation relocation of existing facilities and new facilities of their existing Headquarter site on Cowbridge Road. 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.

- 1.5 Coity Road Sidings COM 1(4)** This 6.4 hectare brownfield site, in private ownership, is located less than 1 km north of Bridgend Town Centre. The site is substantially vacant despite its prime location, close to the town centre. The site offers the opportunity for a mix of uses including residential, a retained area of employment, recreation (including the possible expansion of adjacent allotment facilities) and a proposed park & ride facility, in connection with the existing Wildmill Railway Halt. This site, formerly owned by the British Railways Residuary Board, is now in private ownership with temporary consent for a limited storage facility. However the Council is still seeking to achieve residential development on the site. The site is in a highly sustainable location, close to the town centre and also benefits from a railway station. A small part of this mixed-use site has planning consent for a self-storage facility. The residential element and implementation of the proposed park & ride facility is likely to come forward during the latter part of the five year period. Uncertainty regarding the site in terms of whether the part landowner Dainton may expand their commercial operations on the site has recently been clarified by an appeal decision which upheld the Council's decision to refuse an incompatible energy use and underlined the site's suitability for housing purposes, within the medium term (application P/15/279/FUL refers). However, there has been no positive dialogue with the landowners to bring the site forward for residential development and it has been agreed (as part of the JHLAS 2018 process to be submitted to WAG) that the site should not form part of the 5 year land supply, with a view to reconsidering the landowner's intentions as part of the replacement LDP review of existing sites.
- 1.6 Land at Waterton Lane COM 1(7)** The site is approximately 1.2 hectares in area and lies directly south of the A473, one of the principle highway arteries into Bridgend which links the town with M4 Junction 35 at Pencoed. Bridgend Town Centre lies approximately 2.6 kilometres to the west. The site lies between the A473 and Waterton Lane. Waterton Lane is accessed via a 'left in, left out' junction as the A473 is a dual carriageway road. The junction currently serves the Council Maintenance Depot immediately to the south and west, and the Wicks Van Rental and Lee and Turner sites. In addition, it also serves approximately 25 dwellings at the recent Barratt development – Clos Waterton. Pre-application meetings and design parameter advice have taken place with Development Control Officers and agents representing the land-owner, on the basis of developer interest in the site from a volume house builder. The land has recently changed hands and is now in the ownership of Phillip Jenkins (Wick Van Hire). Discussions indicate that the landowner would be willing to discuss offers and proposals going forward. The agreed JHLAS (2017) forecasts that development of the 42 remaining units proposed by COM1(7) will take place during 2020.
- 1.7 Jubilee Crescent COM 1(8)** This site represents an underutilised greenfield site within the existing urban area of Bridgend and forms part of the Bridgend SRGA with good public transport links and access to local services. Planning permission for 48 dwellings was approved by Development Control Committee on the 7th January 2016. The S106 agreement has been signed and 39 units are under construction.
- 1.8 Brocastle Estate COM 1(10)** the site is located to the east of Brocastle House and A48, some 1.8 Km to the south east of Bridgend Town Centre. The site is at an extremity of the Bridgend County Borough on the boundary with the Vale of Glamorgan Borough. The site is being developed by Hafod Care Association for assisted living units for the elderly in conjunction with the 78 bed nursing home. The remaining 30 units represent the second phase of the development project and involves the construction of an articulated row of units located to the east of the existing new buildings. No issues have been raised in respect of the proposed architecture, ecological matters or other technical matters. Hafod

Care Association has advised that they are going to bring forward the remaining 30 units for assisted living accommodation with start on site programmed within the five year period. The agreed JHLAS (2017) forecasts that this site will be built out between 2020 – 2021 which is slower than anticipated in the phasing of development schedule set out in the LDP.

- 1.9 South Wales Police COM 1(5)** The site lies to the north of the A473, Cowbridge Road, which is a principal route into Bridgend Town Centre, approximately 1.2 kilometres to the North West. The junction of the A48 (Bridgend By-Pass) and A473 Waterton Road, at Waterton Cross roundabout, lies 500 metres to the south east of the site. The site effectively comprises the north-western part of the current Police Headquarters complex, which is accessed via a traffic light controlled junction which also serves Bridgend Retail Park and the Tesco superstore opposite. This site is brownfield, in the Bridgend SRGA located close to the main transport routes and within reasonable walking distance of Bridgend town centre with access to a range of social and community facilities. Recent discussions with the Police has revealed that the site now forms a critical part of their rationalisation programme and will be retained for Police operations and as such will not be released for residential purposes.
- 1.10 Land at Waterton Manor And Waterton Lane COM 1(11) & COM 1(14)** The most recent planning application for 39 dwellings was approved at development control committee of 3rd September 2015. The permission combines housing allocations. The Section 106 agreement was signed on the 9 November 2016 and discussions with the landowner indicates that work on site is expected to commence later this year. The agreed JHLAS (2017) forecasts that this site will be built out between 2019 – 2020 which is slower than anticipated in the phasing of development schedule set out in the LDP.
- 1.11 Parc Farm COM 1(13)** The site is located in the Bridgend SRGA and is a predominantly brownfield in the grounds of the former Parc Farm agricultural buildings. The site benefits from outline consent and a prior notification submission for demolition of the existing buildings. The site has been acquired by Wales and West Housing Association and an application for 24 affordable dwellings is pending. The agreed JHLAS (2017) forecasts that this site will be built out between 2018 – 2019 which is broadly consistent with the phasing of development schedule set out in the LDP.
- 1.12 Land at Llangewydd Road COM 2(6)** This site lies on the western edge of the wider Cefn Glas area of Bridgend. Greenfield in nature, this site has good access to a variety of services locally and public transport links. The site was promoted by Redrow Homes at the LDP Examination which included the submission of a conceptual masterplan for the site. Outline planning application for 165 units has been granted, subject to resolution of a S106 agreement (planning application P/15/358/OUT refers). The agreed JHLAS (2017) forecasts that this site will be built out between 2018–20222 which is broadly consistent with the phasing of development schedule set out in the LDP.
- 1.13 Ysgol Bryn Castell COM 2(7)** The release of this site is as a result of the school modernisation programme. The existing school and grounds will become surplus to requirements and provides the opportunity for its comprehensive redevelopment for residential purposes. This site is within the urban area of Bridgend, within walking distance of public transport hubs and social and community facilities. A Master Plan has been prepared to guide the future development of the site. Planning application from Barratt Homes for Phase 1 of the site for 67 dwellings, accessed off Cefn Glas Road was approved in September 2015 and development has commenced (planning application P/15/25/FUL refers). GVA Grimley has recently completed a Development and Planning Brief for Phase 2 of the site and has identified capacity for 130 dwellings supported by an access appraisal

undertaken by Vectos. The site is scheduled for disposal in early 2018. The agreed JHLAS (2017) forecasts that this site will be built out between 2018 – 2020 which is broadly consistent with the phasing of development schedule set out in the LDP.

- 1.14 Former Washery Site, Maesteg COM 1(16)** The site is located immediately north-east of the town centre and comprises of mixed-use development including educational, residential and recreational uses. Part remediation of the wider Washery site has resulted in the construction of the new Maesteg Comprehensive School and three development plateaux are earmarked for residential development. Two of these areas (as well as land at Llwynderw off Bridgend Road) already benefit from access arrangements but require an element of additional remediation to make them suitable for development. Welsh Government Land Reclamation monies of £2.5m have been approved and drawn down to enable the required remediation and development, (as well as land at Llwynderw off Bridgend Road) with marketing and implementation of the land envisaged within 3 years. ARUP have been engaged to design a detailed scheme for remediation and will oversee the SI works which are scheduled to take place in 2017/18. The remediation scheme will provide an ‘development-ready’ site and marketing will be undertaken in parallel. The agreed JHLAS forecasts that development will start in 2020-2021 reflecting that challenging nature of this site.
- 1.15 Ewenny Road COM 1(17)** This 7.7 hectare site, which was formerly occupied by Cooper Standard and Budelpak Cosi now represents one of the most strategically sited development opportunities in the Llynfi Valley. Located within the urban area of Maesteg adjacent to the Oakwood Estate, which is a renewal priority for V2C Housing. The site is owned, in part, by the County Borough Council, and has been identified as suitable for funding from the Western Valleys Strategic Regeneration Area (WVSRA). The strategic and sustainable location of the site, adjacent to a rail halt on the Maesteg to Bridgend line, means that this regeneration opportunity could have benefits for the whole of the Llynfi Valley. The significance of this opportunity has been recognised by the Llynfi Valleys Area Regeneration Plan (VARP) which earmarks the future development of the area as a Strategic Project. The LDP strategy promotes the site as a flexible regeneration opportunity to create a new mixed-use neighbourhood that can deliver much needed development space for small businesses, new market and affordable housing, and related commercial and social facilities set within a pleasant environment that can capitalise on its riverside setting. Outline planning application P/13/808/OUT for a mixed use development, including 115 dwellings and a 50 unit residential extra-care facility (165 units total) was presented to Development Control Committee in June 2014. This has been amended to 138 dwellings. This revision of the Masterplan and the Heads of Terms of the Section 106 Agreement was presented to Committee in May 2016 and the S106 is soon to be finalised with just minor issues to be resolved. The Council have agreed to dispose of their interest to Clowes (Pontardawe Coal and Metals Co. Ltd) at such time that the decision notice is issued. Clowes intend to dispose of the housing element immediately but retain the commercial element and build this out themselves. Volume builders are showing active interest in acquiring the site. The agreed JHLAS (2017) forecasts that this site will be built out between 2018 – 2021 which is broadly consistent with the phasing of development schedule set out in the LDP.
- 1.16 Coegnant Reclamation Scheme COM 1(18)** This is a large development site in the upper Llynfi Valley comprising of a linear site of approximately 15 hectares of brownfield land, located immediately to the east of the communities of Caerau and Nantyyffyllon. Previously allocated solely for employment and recreational uses it is now recognised that the comprehensive development of the whole area represents a significant opportunity to

enhance the environment, improve access to the countryside for the benefit of tourism and deliver a mixture of uses, including new market and affordable housing, open-space, more formal recreation facilities and local employment opportunities and social enterprises. At its northern end the site integrates well with the new primary school in Caerau and is currently the focus of recreation facilities and a new leisure park, including a BMX track. At its southern extremity, the site has the potential to link via a dedicated walking and cycling route to the Maesteg Washery Site and the newly opened Maesteg Comprehensive School, which is located less than 1.5km to the south. The site is seen as having scope for a mixed-use scheme for residential / employment and leisure uses. The agreed JHLAS (2017) forecasts that this site will be built out in the latter part of the plan period between 2020 – 2022 in recognition that market conditions and land values will slowly improve in the upper valley areas. This forecast is broadly consistent with the phasing of development schedule set out in the LDP.

- 1.17 Crown Road, Maesteg COM 1(19)** This is a brownfield site within the urban area of Maesteg with good public transport links and access to local services. This site is located in close proximity to the Former Maesteg Washery Site and part of the Maesteg & Llynfi Valley SRGA and provides an opportunity for the development of additional housing close to local amenities. Whilst there is not any planning consent for site at present, discussions have taken place with landowners where they indicated that they intend to either develop the site themselves on a plot by plot basis but are also considering releasing the site to a local developer. There are no significant known site constraints that would prevent this site from coming forward. The agreed JHLAS (2017) forecasts that 10 units are anticipated to be delivered in 2019 and 2020 with the remaining units post 2020 which is broadly consistent with the phasing of development schedule set out in the LDP. In addition, the adjacent Bryneithin Home site has been sold to a developer and the Prior Notification of the demolition of the former care home was approved in July 2015 and demolition has been carried out, which provides an additional incentive for development.
- 1.18 Y Parc COM 1(21)** This residential allocation is a brownfield (but partly regenerated) site within the existing urban area of Maesteg with good public transport links and access to local services. Highways issues constrain the development of the site to an area capable of accommodating only 51 units which the allocation reflects. The site is sustainably located within walking distance of Maesteg Town Centre. The site is relatively flat and there are not any known significant site constraints. Slow market conditions has contributed to this site not be brought forward for development, however it is encouraging that the site is being marketed by Cooke & Arkwright who confirm that there is considerable interest from developers in the site. The agreed JHLAS (2017) forecasts that 20 units are anticipated to be delivered in 2019 and 2020 with the remaining 31 units post 2020 which is broadly consistent with the phasing of development schedule set out in the LDP and reflective of the slow market conditions in Maesteg & Llynfi Valley SRGA. However, as part of the 2018 JHLAS process (yet to be finalised) it has been agreed that the site should not contribute to the 5 year land supply because there is as yet no developer on board.
- 1.19 Porthcawl Regeneration Area COM 1(25)** The Porthcawl Waterfront Regeneration site (48 ha) is the main focus of existing and future development opportunities in Porthcawl in the adopted LPD and provides a unique opportunity to create a vibrant new focus that will bring social, economic and environmental benefits including flood protection measures to the Town itself and the wider area. This 48 hectare brownfield waterfront site provides a significant opportunity through comprehensive regeneration to transform Porthcawl into a premier seaside resort. The entire Waterfront area has the benefit of an existing Masterplan (the Seven Bays Project Supplementary Planning Guidance (SPG)) which was adopted by

the Council in November 2007. The Bridgend Local Development Plan (LDP) adopted in 2013 reaffirmed the general planning policy outlined in the SPG by allocating the site as a Mixed-Use Regeneration Scheme under Policy PLA3(8). The LDP proposes 1050 new dwellings for the whole of the Porthcawl Waterfront up to 2021, with an additional 300 dwellings anticipated to be delivered beyond the plan period. New retail, leisure and commercial development are also proposed, although the scale of this is not prescribed or confirmed in the plan. In addition, there was an outline planning consent obtained on the Harbourside site on 13th May 2013 (which has now expired). Since 2008 there have been several attempts by the owners to deliver development on the site. The first round was thwarted by the financial crises and subsequent moves to deliver a superstore and smaller retail units reached positions whereby Tesco, Morrison's and Sainsbury's were at advanced stages in negotiation but all subsequently withdrew. These retail operators have concluded that the large superstore which was originally to be the main driver of the scheme is undeliverable. However, evidence accumulated as part of this process suggests that a smaller scale food store should be achievable, alongside various other commercial, leisure and community uses. The residential market has continued to improve and the unique qualities of this site make it a valuable residential commodity. In recognition on the need to deliver this key regeneration scheme, Nathaniel Lichfield and Partners were appointed in September 2015 by the landowning partnership (Bridgend County Borough Council and the Evans Family, represented by Cooke and Arkwright) to prepare a new Masterplan and supporting guidance to be a catalyst for delivery of the first phase of the Seven Bays Project. The new Porthcawl Harbourside Masterplan (2016) only considers the first phase of the Seven Bays Project SPG (2007) and is known as Porthcawl Harbourside which covers the area between the town centre and the Eastern Promenade. The site has a gross area of approximately 17 acres. The purpose of the new Masterplan (2016) was to revise the land-use section of the 'Western Development Area'. The reason for this was to reflect the changing market conditions particularly in the retail sector which is now significantly different than was anticipated in 2007. There is also a need to reconsider the infrastructure requirements in order to ensure that these do not present a financial barrier to development. The Masterplan proposes 559 residential units in a number of discrete commercial and residential parcels, suitable for take-up by a range of developers.

- 1.20** Bridgend County Borough Council have purchased the phase 1 site from the Evans Family and the and the landowners agreement (that has been one of the main barriers to the site's delivery) is now null and void. Looking forward, the regeneration of the site and Phase 2 may also benefit from a potentially successful bid to the Welsh Government Coastal Risk Management Programme funding of major flood defence works across Wales, where £125m is allocated for spend between 2018 – 2021.
- 1.21** The LPA recognises that the site is unlikely to be delivered in its entirety during the existing plan period. The agreed JHLAS (2017) forecasts that 50 units are anticipated to be delivered in 2018 and 2019 and 500 units delivered between 2019 and 2022 which is slower than anticipated in the phasing of development schedule set out in the LDP.
- 1.22** **Albert Edwards Prince of Wales Court COM 1(28)** This site is a committed brownfield site within the urban area of Porthcawl, close to the town centre with good access to public transport and local services. RMBI have invested in the existing care home and have brought back a rear wing into use, part of which, serves an increasing need to provide for people with Dementia. Therefore they are no longer looking to re-develop the existing care home. The most recent communication with the RMBI'S Development Team Manager is that there are no programmed plans to release part of the site for alternative residential development.

- 1.23 Land off Maesteg Road COM 1(31)** Land off Maesteg Road COM 1(31) is a mixed-use Regeneration Area in Tondu measuring approximately 43 hectares of land, which has already delivered the Tondu Ironworks Heritage Centre and a new Waste Transfer Station, serving the whole of the County Borough. Llanmoor Homes are developing the southern part of the site and to date 226 units have been delivered on this site which is hugely positive in tough market conditions, however, delivery rates have been slower than expected. Merthyr Mawr Estates proposes to market the remainder of the site with the benefit of an outline planning consent, and introduce other developers on site. There is positive interest from other volume builders and planning application P/16/366/OUT is expected to be presented to Development Control Committee in November 2017. Planning permission has also been granted for additional retail / commercial development within the designated commercial hub in the southern part of the site (planning application P/15/322/FUL refers). The agreed JHLAS (2017) forecasts the site to deliver the remaining 474 units over the next six years.
- 1.24 Parc Tyn Y Coed COM 1(32)** to date Barratt South Wales have developed 264 residential units on site with development ongoing. The eastern part of site is in alternative ownership and access from Parc Tyn y Coed development exists together with developer interest. A recent planning application (P/16/251/OUT refers) has been submitted to the LPA with a resolution to grant planning permission subject to a S106 agreement for 16 dwellings with public open space and associated infrastructure on land accessed via Heol Leyshon. The agreed JHLAS (2017) forecasts that 16 units are anticipated to be delivered in 2018-2019 with the remaining 106 units in 2019-2020 which is broadly consistent with the phasing of development schedule set out in the LDP.
- 1.25 Gateway to the Valleys COM 1 (34)** The comprehensive school is now operational and the new primary school is under construction. Linc Cymru have been granted planning permission for the development of 15 bedspace care unit & 25 apartment extra care combined with communal ancillary facilities, 15 No. 2 bed 4 person and 4 No. 3 bed 5 person served by adopted access road (P/16/600/FUL refers). Linc Cymru are expected to start development imminently. A pre-requisite of the new school and the Linc Cymru development is for an access road to be built to adoptable standards delivered up to the boundary of the private land to the east which is currently land locked. This new road will able this 7 acre site to be released for development. The Private landowners are in contact with Bridgend Council's Property Department and are keen to progress when the necessary infrastructure is in place. Housing delivery is anticipated from 2018 onwards on this part of the site to dovetail with primary school completion. The build programme for the 25 extra-care apartments by Linc Cymru is scheduled for completion by October 2017 and Linc Cymru's additional housing element of 20 units will follow on immediately. Given that the school is also programmed to open in 2018 it is reasonable to assume the whole site will be delivered in the five year period. The landowner is in discussion with the Council and a pre-application meeting recently took place and there is active interest from volume builders.
- 1.26** The agreed JHLAS (2017) forecasts that housing delivery is anticipated from 2018 onwards to dovetail with primary school completion.

## Summary

- 1.27 It is recognised that there are a few challenging allocations that have progressed slower than anticipated but significant progress has been made in bringing these sites forward with Masterplans and Development Briefs in place. In addition, planning applications relating to many of these sites are substantially advanced demonstrating private sector interest and that the LDP strategy has broadly been successful. It must be recognised that many of these sites have only not come forward due to viability and market conditions. The delays in them coming forward, however, have implications for other monitoring targets and triggers and the need for any further action is being considered in connection with those particular indicators. Given the importance of delivering COM1 and COM2 sites, particularly in terms of their contribution to the 5 year land supply, the Local Planning Authority recognises the need to address this issue immediately through the statutory LDP Review process and will continue to monitor their progress closely.

### **Appendix 3 & 4: Invitation to prepare Joint Local Development Plan and invitation to Local Planning Authorities to prepare a Strategic Development Plan.**

<https://democratic.bridgend.gov.uk/documents/s14761/Appendix%20%20Invitation%20to%20prepare%20Joint%20Local%20Development%20Plan%20and%20invitation%20to%20Local%20Planning%20Auth.pdf>

### **Appendix 5: Cardiff Capital Region Joint Cabinet response to the Cabinet Secretary supporting the principle of a SDP for the Cardiff Capital Region.**

<https://democratic.bridgend.gov.uk/documents/s14759/Appendix%20%20-%20Cardiff%20Capital%20Region%20Joint%20Cabinet%20response%20to%20the%20Cabinet%20Secretary.pdf>

### **Appendix 6: Bridgend County Borough Council's formal response to the Cabinet Secretary in relation to preparing Joint Local Development Plans and Report to Council (28<sup>th</sup> February 2018).**

<https://democratic.bridgend.gov.uk/documents/s14758/Appendix%201%20-%20BCBC%20response%20to%20Lesley%20Griffiths%20AM.pdf>

Report to Council: 28<sup>th</sup> February 2018

<https://democratic.bridgend.gov.uk/documents/s14757/FULL%20COUNCIL%2028%20FEB%202018%20-%20JOINT%20LDPs%20SDP%20BCBC%20RESPONSE.pdf>

Accompanying Options Appraisal

<https://democratic.bridgend.gov.uk/documents/s14762/Appendix%205%20-%20Options%20Appraisal.pdf>

## **Appendix 7 – LDP (2013) Draft Review Report: Public Consultation Report – Summary of Key Issues Raised**

- 1.1** A statutory review of the Bridgend Local Development Plan (LDP) commenced in 2017, the first stage being the publication of the Draft Review Report which was subject to a four week stakeholder consultation period commencing Monday 30 April 2018 until 5pm Friday 25 May 2018.
- 1.2** The Draft Review Report was accompanied by an official comments form that included the following five questions and an opportunity to provide additional comments if required:
- **Q1. Does the Review Report identify all the key contextual issues to be considered in the review of the LDP?**
  - **Q2. Does the existing LDP Vision & Objectives remain appropriate for a Revised Plan?**
  - **Q3. Do you agree that the existing LDP Regeneration-Led Spatial Strategy needs to be reviewed?**
  - **Q4. Does the Review Report identify the policies that are likely to need changing in the Revised Plan?**
  - **Q5. Does the Review Report identify the most appropriate revision procedure to prepare a Revised Plan and whether the Review should be undertaken individually or jointly?**
- 1.3** The LPA received 11 consultation responses. A summary of the key issues raised in relation to the questions on the Draft Review Report is provided in the table below:

| Consultation Question  | Representor                                     | Comment  | LPA Response    | Recommendation                           |
|--|---|--|-----------------|--|
| Q1. Does the Review Report identify all the key contextual issues to be considered in the review of the LDP? | The Glamorgan Gwent Archaeological Trust Ltd    | None.  | None.           | No change required to the Review Report. |
|  | Natural Resources Wales                         | <p>Thank you for consulting Cyfoeth Naturiol Cymru / Natural Resources Wales on the above LDP draft review report, which we received on 24 April 2018.</p> <p>We welcome the consultation, and we agree that a full revision appears logical. We would like to take the opportunity to offer our support, including informal engagement throughout the LDP review process.</p> <p>The review document appears to highlight all relevant policy and legislative changes that require consideration in the context of the review. From a Biodiversity perspective, the new Section 6 duty introduced by the Environment Act and the wellbeing goals set out in the Wellbeing of Future Generations Act must be key considerations of the revised LDP in delivering sustainable development.</p> <p>With regard specifically to paragraph 2.2.8 'The Wellbeing of Future Generations Act 2015', we feel it is important to raise and emphasise that a 'resilient' Wales refers to the 'resilience of ecosystems'. This links directly with the newly enhanced duty of public authorities to 'maintain and enhance biodiversity wherever possible within the proper exercise of their functions.' This enhanced duty should be a core issue as part of the review.</p> | Comments noted. | No change required to the Review Report. |
|  | National Grid                                   | None.  | None.           | No change required to the Review Report. |
|  | Merthyr Mawr Community Council                  | None.  | None.           | No change required to the Review Report. |
|  | South Wales Police, Designing Out Crime Officer | None.  | None.           | No change required to the Review Report. |

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|  | The Coal Authority              | None.  | None.  | No change required to the Review Report. |
|  | Mrs M C Wilkins                 | Bridgend County Borough Council has gone against Policy ENV2, development of Green Wedge. Development which causes or contributes to the (coalescence) of settlements or reduces openness (the openness) of land between settlements will not be permitted.  | The comments received from Mrs M C Wilkins are noted. This matter will be considered as part of the Replacement LDP process.   | No change required to the Review Report. |
|  | Cllr Dr Venables                | Yes.   | None.  | No change required to the Review Report. |
|  | Home Builders Federation        | Yes.   | None.  | No change required to the Review Report. |
|  | Barratt Homes (BDW Trading Ltd) | <p>It is agreed that the review report captures all of the key contextual issues to be considered as part of the LDP review.</p> <p>Whilst the report documents the potential changes in Welsh Government Population and Household Projections, there is a need to ensure that, going forward, any changes in projections are considered in the round with other factors which will influence land use requirements and aspirations. Population and household projection figures should only be considered as starting points in setting housing land requirements and allocations within LDP's.</p> <p>Whilst the current LDP strategy for growth and regeneration currently allows for a higher level of allocations than the latest population projections suggest might be necessary, any global figure for housing allocations will need to factor in the fact that Bridgend CBC is signed up to the Cardiff Capital Region City Deal and; the need to make an allowance for flexibility and the current backlog in housing land supply.</p> <p>The Council has recently confirmed its support for the City Deal in agreeing to sign up to the proposed budget for the next 5 years (April 2018). The LDP review report correctly identifies the City Deal as a key</p> | <p>The comments received from Barratt Homes (BDW Trading Ltd) are noted.</p> <p>The level of housing growth required will be a matter considered as part of the Replacement LDP process.</p> <p>Officers of BCBC will be working simultaneously with other LPAs to prepare an SDP (subject to political approval) thus ensuring coherence and a regional approach. This would ensure that Bridgend LDP does not prejudice or compromise a future SDP</p> | No change required to the Review Report. |

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|  |                                    | <p>factor in the LDP review, which will need to capitalise on the opportunities that will be presented and the implications this will have on the need to deliver new housing.</p> <p>Bridgend CBC includes land in strategically important locations to make the best opportunity to capture growth to come out of the city deal and this should be recognised and capitalised on through a growth strategy.</p> <p>To summarise, the report does identify all of the contextual issues, but it is important in future stages to give each of the contextual issues appropriate weight, whilst maintaining a growth strategy for the borough.</p> | strategy whilst maintaining up-to-date development plan coverage. |  |
|  | Edenstone Homes Ltd (DPP Planning) | Yes.   | None.   | No change required to the Review Report. |

| Consultation Question  | Representor                                     | Comment  | LPA Response  | Recommendation                           |
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| Q2. Does the existing LDP Vision & Objectives remain appropriate for a Revised Plan? | The Glamorgan Gwent Archaeological Trust Ltd    | None.  | None.   | No change required to the Review Report. |
|  | National Grid                                   | None.  | None.   | No change required to the Review Report. |
|  | Natural Resources Wales                         | We feel that nature based solutions should be embedded as a cross cutting objective within both the LDP and the local Wellbeing Plan and form part of the vision for the revised plan. Appropriate mechanisms are also required to secure delivery of green infrastructure within development and consider habitat connectivity on a landscape scale.<br><br>Undelivered allocated sites should be re-assessed using up to date environmental constraints e.g. revised flood map information. We can provide advice on existing constraints. | Comments noted.   | No change required to the Review Report. |
|  | Merthyr Mawr Community Council                  | None.  | None.   | No change required to the Review Report. |
|  | South Wales Police, Designing Out Crime Officer | None.  | None.   | No change required to the Review Report. |
|  | Welsh Water (dwrcymru)                          | None.  | None.   | No change required to the Review Report. |
|  | The Coal Authority                              | None.  | None.   | No change required to the Review Report. |
|  | Mrs M C Wilkins                                 | The LDP vision has already been (overturned) with large scale over development of land for houses by Bridgend County Borough Council Planning Committee giving permission.   | The comments received from Mrs M C Wilkins are noted. The LDP Vision will be reviewed as part of the Replacement LDP process. | No change required to the Review Report. |
|  | Cllr Dr Venables                                | Yes.   | None.   | No change required to the Review Report. |

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|  | Home Builders Federation           | <p>In terms of the Vision this may need to be amended to take account of the proposed regional working including, SDP and City Deal. The direction of travel these are setting would suggest the role of the LPA in the wider context has to be given greater consideration. In terms of the 4 Strategic Objectives the HBF would note that no.2 is clearly protective, whilst the other three do not as clearly support development. The HBF suggests that the wording should be re- considered for at least one of the Strategic Objectives so that it talks about the wider benefits of development both in terms of meeting housing need but also supporting economic growth and prosperity.</p>  | <p>The comments received from the HBF are noted. The LDP Vision and Objectives will be reviewed as part of the Replacement LDP process.</p>                         | <p>No change required to the Review Report.</p> |
|  | Barratt Homes (BDW Trading Ltd)    | <p>It is considered that the existing LDP Vision and Objectives remain appropriate for the revised plan, however, there is a need to introduce additional objectives as follows:</p> <p>To recognise the need to rectify the current shortage in housing land supply and provide for a more flexible and robust supply throughout the new plan period. This could be included by adding an objective to ‘deliver a range and choice of housing sites in order to maintain a flexible and robust housing land supply.’ To recognise the role that Bridgend CBC will need to play in capturing the benefits of the City Deal by adding an objective to ‘support the objective of the Cardiff Capital Region City Deal by adopting a growth strategy for employment and housing land’.</p> <p>This would accord with the well-being goals of creating a prosperous, resilient and more equal Wales, without compromising any of the other goals.</p> | <p>The comments received from Barratt Homes (BDW Trading Ltd) are noted. The LDP Vision and Objectives will be reviewed as part of the Replacement LDP process.</p> | <p>No change required to the Review Report.</p> |
|  | Edenstone Homes Ltd (DPP Planning) | <p>In general terms, it is considered that the overall LDP Vision and Objectives remain appropriate for the revised Plan, however, it is considered that some tweaking is necessary and appropriate to ensure the Authority continue to try and meet their housing delivery targets. Bridgend’s location relative to the Cardiff Capital Region is a key factor, and it is considered that BCBC should place more weight on the role it has in delivering much needed housing across this region, rather than assessing the requirements within the confines of its own boundary. The use of population growth figures alone in determining housing targets should not be slavishly adhered to, and whilst it is acknowledged that some reduction in the number of homes the Authority need to deliver over</p>   | <p>The comments received from Edenstone Homes Ltd are noted. The LDP Vision and Objectives will be reviewed as part of the Replacement LDP process.</p>             | <p>No change required to the Review Report.</p> |

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|  | <p>the plan period is likely to occur, given its wider role the Authority should seek to be aspirational in its target.</p> <p>The Authority should take full advantage of its location and view this as being a key economic opportunity to bring jobs and wealth to the area from other parts of the region, where it would otherwise not have benefitted.</p> <p>The four overall Strategic Objectives should also reflect a more positive attitude towards development. Further comment is made below in respect of the regeneration led spatial strategy, however, in our view this hasn't worked to its fullest, and therefore Strategic Objective 3 should be amended to not only refer to 'regeneration', but also include 'development' more generally as a tool to spread prosperity and opportunity.</p> |  |  |
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| Consultation Question  | Representor                                  | Comment   | LPA Response   | Recommendation                           |
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| Q3. Do you agree that the existing LDP Regeneration-Led Spatial Strategy needs to be reviewed? | The Glamorgan Gwent Archaeological Trust Ltd | None.   | None.  | No change required to the Review Report. |
|  | Natural Resources Wales                      | <p>Yes, we would suggest that this should be reviewed in line with the principles of Sustainable Management of Natural Resources as set out in the Environment Act. We would raise the opportunities for collaboration on green infrastructure projects with neighbouring authorities as species and habitats connectivity should be considered on a landscape scale.</p> <p>We also wish to emphasise the opportunities within the review to consider priorities for habitat connectivity for key species at a landscape scale. In particular, the county of Bridgend is a key area for dormouse, with established populations in a number of areas, including two of the listed strategic employment sites (Island Farm and Brocastle).</p> | Comments noted.  | No change required to the Review Report. |
|  | National Grid                                | None.   | None.  | No change required to the Review Report. |
|  | Merthyr Mawr Community Council               | None.   | None.  | No change required to the Review Report. |
|  | Welsh Water (dwrcymru)                       | None.   | None.  | No change required to the Review Report. |
|  | The Coal Authority                           | None.   | None.  | No change required to the Review Report. |
|  | Mrs M C Wilkins                              | No.   | None.  | No change required to the Review Report. |
|  | Cllr Dr Venables                             | Yes.  | None.  | No change required to the Review Report. |
|  | Home Builders Federation                     | Yes.  | None.  | No change required to the Review Report. |
|  | Barratt Homes (BDW Trading Ltd)              | The review report acknowledges that the LDP regeneration led spatial strategy needs to be reviewed. It is evident that the reliance upon regeneration sites has, in part, led to the current difficulties in housing land supply, albeit there are other external factors for this including market   | The comments received from Barratt Homes (BDW Trading Ltd) are noted. The Spatial Strategy will be | No change required to the Review Report. |

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|  |   | <p>difficulties. To address such issues, the Council should seek to allow substantial greenfield developments to sustain existing communities throughout the county. It is essential that the LDP delivers a range and choice of housing sites to maintain flexibility in housing land supply and to provide a robust LDP strategy for delivering them. Porthcawl is recognised as a strategic centre and this should be maintained within the new strategy.</p> <p>As well as the shortfall in housing land supply across the entirety of BCBC, it is evident that there is a localised acute shortfall in supply in the Porthcawl Strategic Regeneration Growth Area. The 2016 JHLAS confirmed that only 91 units (of those sites listed in the JHLAS) have been built in Porthcawl to date, with only 38 of these having been built since the 2015 JHLAS. Those units that have been built have come forward across a number of smaller residential LDP allocations and windfalls from sites within settlement boundaries. No units have been delivered at the Waterfront Regeneration Area allocation, which accounts for 87% of allocated units within the Porthcawl Strategic Regeneration Growth Area. There is a need to reduce the reliance in meeting Porthcawl's housing need on the Waterfront Regeneration Area through sustainable housing allocations, which will also be necessary to provide for a choice of family homes as well as the (likely) supply of flatted development within the waterfront regeneration. Alternatively, as advocated in paragraph 3.35 of the draft PPW 10, such sites should be allocated but not count towards the overall LDP housing supply. Porthcawl and Pyle are ideally located close to junction 37 of the M4 in order to capture benefits from the City Deal, whilst building upon existing available infrastructure.</p> | <p>reviewed as part of the Replacement LDP process.</p>  |   |
|  | <p>Edenstone Homes Ltd (DPP Planning)</p> | <p>Yes – particularly in the Porthcawl regeneration area. The reliance BCBC have placed on the Seven Bays project in delivering housing and regeneration in this area has been challenged on several occasions, and whilst it is acknowledged that steps have been taken by BCBC to now bring the site(s) forward for development, there remains doubt that the allocation will deliver the necessary benefits, and more importantly housing to meet the housing targets.</p> <p>Accordingly, it is considered that the regeneration led strategy for the Porthcawl Area needs to be reviewed more closely to ensure that over the</p>  | <p>The comments received from Edenstone Homes Ltd are noted. The Spatial Strategy will be reviewed as part of the Replacement LDP process.</p> | <p>No change required to the Review Report.</p> |

next plan period the housing needed to achieve the regeneration objectives in this area are met. Accordingly, BCBC should seriously consider the allocation of other land in this area that could come forward without delay and have less obstacles to its delivery – thereby enabling BCBC to meet their regeneration aspirations for this area.

The focus for these allocations should be around the M4 corridor – around Kenfig Hill / North Cornelly / Pyle. Such allocations would also support the employment allocations in the area, which have been more successful in this location.

| Consultation Question  | Representor                                  | Comment   | LPA Response | Recommendation                           |
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| Q4. Does the Review Report identify the policies that are likely to need changing in the Revised Plan? | The Glamorgan Gwent Archaeological Trust Ltd | None.   | None.        | No change required to the Review Report. |
|  | National Grid                                | None.   | None.        | No change required to the Review Report. |
|  | Natural Resources Wales                      | <p>We note the summary of the proposed LDP policy review which refers to possible amendments to policy SP4 – Conservation and Enhancement of the Natural Environment. We would support this and would suggest that this Policy could be strengthened to provide further consideration to opportunities for green infrastructure and improvements to habitat connectivity on a landscape scale.</p> <p>We would wish to reiterate the fundamental change to maintain and enhance under Section 6 of the Environment Act which needs to be considered in the LDP review. In addition, we wish to reiterate the focus towards ecosystem resilience which is a key goal of the Principles of Sustainability within the Wellbeing of Future Generations Act 2015 which also needs to be given consideration as part of the LDP review.</p> | Agreed.      | No change required to the Review Report. |
|  | Merthyr Mawr Community Council               | None.   | None.        | No change required to the Review Report. |
|  | Welsh Water (dwrcymru)                       | None.   | None.        | No change required to the Review Report. |
|  | The Coal Authority                           | I have reviewed the Draft Review Report and note that most of the policies which are of interest to the Coal Authority are noted as being functioning effectively with only minor amendments required to reflect contextual changes, legislation and updated national planning policy. It is noted however that changes are proposed to Policy ENV11 to reflect the most up to date Technical Guidance.   | None.        | No change required to the Review Report. |

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|  |                                    | On the basis of the changes proposed in the Draft Review Report the Coal Authority has no specific comments to make at this early stage.   |  |  |
|  | Mrs M C Wilkins                    | “Policy ENV3 - No change. Except more conservation areas and Special Landscape Areas Court Colman Farm. This includes Penyfai Common that must be protected from encroachment.   | The comments received from Mrs M C Wilkins are noted. This matter will be considered as part of the Replacement LDP process.   | No change required to the Review Report. |
|  | Cllr Dr Venables                   | Yes.   | None.  | No change required to the Review Report. |
|  | Home Builders Federation           | Yes subject to the comments below.<br><br>The HBF suggests that under Housing and Site Allocations more weight needs to be given to the review of previously undeveloped allocated sites. Also the importance of giving greater consideration to the viability of sites needs to be identified in line with both the recent Arcadis report for WG and the draft PPW10.   | All existing undeveloped ‘brownfield’ allocations in the existing LDP will be reviewed as part of the Replacement LDP process. | No change required to the Review Report. |
|  | Barratt Homes (BDW Trading Ltd)    | Appendix 1 documents each of the policies within the LDP and makes a comment on whether there is a need to revise each of the policies depending on how effectively they are functioning present. The appendix identifies that the vast majority of the policies are functioning effectively but minor amendments may be required to reflect contextual changes and updated national planning policy.<br><br>BDW supports a recognition that the policies SP1, PLA1 COM1 and COM2 require revision to address the housing land supply shortage and to ensure a more robust and flexible housing land supply going forward. | None.  | No change required to the Review Report. |
|  | Edenstone Homes Ltd (DPP Planning) | Yes, however, it is evident from the Review Report that ownership and viability of sites remain a key obstacle in delivery of housing sites. This is, we believe, a direct result of the regeneration based strategy that relies too heavily on either previously developed land, or sites with complicated ownership structures.<br><br>Accordingly, such sites should be accompanied by ‘simpler’ or ‘cleaner’ sites, i.e. greenfield, that are generally free from such restrictions and are likely to come forward quickly.  | All existing undeveloped ‘brownfield’ allocations in the existing LDP will be reviewed as part of the Replacement LDP process. | No change required to the Review Report. |

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|  |  | In addition, we believe greater scrutiny should be made of previously undeveloped allocated sites, and in particular their viability prior to their allocation/re-allocation in any revised plan. |  |  |
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| Consultation Question  | Representor                                     | Comment  | LPA Response  | Recommendation                           |
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| Q5. Does the Review Report identify the most appropriate revision procedure to prepare a Revised Plan and whether the Review should be undertaken individually or jointly? | The Glamorgan Gwent Archaeological Trust Ltd    | None.  | None.   | No change required to the Review Report. |
|  | Natural Resources Wales                         | It would be beneficial if a joint LDP was undertaken with neighbouring authorities. Many of our strategic planning interests are better considered on a cross boundary level. This will also fit in with the Area Statements.<br><br>However, we appreciate the difficulties you may have undertaking a joint LDP. | NRW are referred to sections 5.1 – 5.21 of the Review Report which sets out the justification for BCBC preparing a replacement of its existing LDP.   | No change required to the Review Report. |
|  | National Grid                                   | None.  | None.   | No change required to the Review Report. |
|  | Welsh Water (dwrcymru)                          | None.  | None.   | No change required to the Review Report. |
|  | South Wales Police, Designing Out Crime Officer | None.  | None.   | No change required to the Review Report. |
|  | The Coal Authority                              | None.  | None.   | No change required to the Review Report. |
|  | Mrs M C Wilkins                                 | No review should take place or revised plan. Bridgend and communities have had enough of large scale over development of land for houses and small scale development taking the green wedge land between settlements (Policy ENV2)   | An up-to-date LDP is an essential part of a planned planning system in Wales. In order to ensure that there is a regular and comprehensive assessment of whether plans remain up-to-date the Council is statutorily required under Section 69 | No change required to the Review Report. |

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|  |                                    |   | of the Planning and Compulsory Purchase Act 2004 to undertake a full review of the adopted LDP at intervals not longer than every 4 years from the date of adoption. As such, a full review of the adopted LDP was triggered in September 2017. |  |
|  | Cllr Dr Venables                   | Yes.  | None.   | No change required to the Review Report. |
|  | Home Builders Federation           | Yes the HBF considers a full review as recommended by the report the most appropriate revision procedure.<br><br>The HBF has no preference on whether or not the review is undertaken individually or jointly.  | None.   | No change required to the Review Report. |
|  | Barratt Homes (BDW Trading Ltd)    | Full support is given to the preferred option of an individual review of the Bridgend LDP, whilst simultaneously working collaboratively with the region to prepare an SDP.<br><br>This is considered to be the quickest and most reliable way forward to achieve new allocations to address the housing land supply shortage, as well as addressing identified issues with the employment allocations within the LDP. The complexity of engaging in a joint local plan would most likely lead to substantial delays in producing an adopted plan and a potential policy vacuum going forward.<br><br>Relying upon an SDP and foregoing an individual LDP would also carry the same risk, i.e. the high potential for significant delays in producing and SDP (which has yet to be attempted anywhere in Wales) will inevitably lead to a policy vacuum in the short term. BDW therefore support option 2, which is to proceed immediately with an individual review of the Bridgend LDP. | None.   | No change required to the Review Report. |
|  | Edenstone Homes Ltd (DPP Planning) | Yes, a full review as recommended by the report i.e. Option 2 or 3, is the most appropriate revision procedure given the need to look at the delivery of housing more widely.   | None.   | No change required to the Review Report. |

## Further Comments

| Representor                                  | Comment  | LPA Response  | Recommendation                           |
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| The Glamorgan Gwent Archaeological Trust Ltd | The historic environment is an important part of Bridgend CBC's area, and includes statutorily designated historic assets of both areas and structures, as well as non-designated historic assets. The range of these includes areas such as the Mesolithic flint scatters at Merthyr Mawr Warren, shrunken Medieval villages, and the historic core of Bridgend, with its Medieval bridge, castle and church, industrial minerals extractive and transporting landscapes, RAF Stormy Down, as well as information on isolated finds of all periods, all of which contribute to the distinctive heritage and current form of the area. We are also able to provide information on the policies and procedures that have been adopted for development in other local authorities: for Bridgend, eleven areas have been delineated as Archaeologically Sensitive Areas in an Archaeology and Archaeologically Sensitive Areas SPG which has been supplied to you in draft in 2017 and is awaiting approval. The historic environment should not be seen as any constraint to development, but viewed with the Well-being of Future Generations (Wales) Act, contribute substantially to the well-being goals relating to culture and community, and by understanding and enhancement to the remaining goals. The Draft Review Report notes in 2.2.11 that the Historic Environment (Wales) Act 2016 has become law, giving more effective protection to the historic environment in Wales. There is a suite of relevant supporting policy (Planning Policy Wales 9, 2016 Chapter 6: The Historic Environment, technical advice notes (TAN24: The Historic Environment) and best practice guidance, some of which is still emerging. Inclusion of these in a revised Plan would acknowledge current legislation and support current professional standards. | The comments received from the Glamorgan Gwent Archaeological Trust Ltd are noted.                  | No change required to the Review Report. |
| National Grid                                | National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.   | The comments received from National Grid are noted.<br><br>No change required to the Review Report. | No change required to the Review Report. |
| Merthyr Mawr Community Council               | Thank you for providing the information regarding Bridgend Local Development Plan (2013) - Consultation on Draft Review Report & Draft Replacement Local Development Plan Delivery Agreement. This was noted by Merthyr Mawr Community Council during their meeting on Monday 14th May 2018. Merthyr Mawr Community Council are satisfied with the way the review is being undertaken at present.  | The comments received from Merthyr Mawr Community Council are noted.                                | No change required to the Review Report. |
| Welsh Water                                  | Thank you for consulting Welsh Water on the Draft Review Report. We have no specific comments to make on the content but are keen to be involved in the  | The comments received from Welsh Water are noted. The   | No change required to the Review Report. |

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|   | early stages of the Replacement LDP.  | LPA will liaise with Welsh Water as part of the Replacement LDP process.   |   |
| South Wales Police, Designing Out Crime Officer | In respect of the above, I would like to pass comment at the appropriate time, as the Designing out Crime Officer for the Bridgend County Borough Council Area, to strengthen the subject topic of Community Safety within the Local Development Plan.  | The comments received from South Wales Police (Designing Out Crime Officer) are noted. The LPA will liaise with South Wales Police on this issue as part of the Replacement LDP process.   | No change required to the Review Report.  |
| Mrs M C Wilkins                                 | Bridgend County Borough is suffering from over intensification of large housing developments; this is putting a strain on our communities and causing the highway structure to become grid locked. The LDP is against over intensification of houses and this is adopted by Bridgend County Borough Council.  | The comments received from Mrs M C Wilkins are noted. The Spatial Strategy will be reviewed as part of the Replacement LDP process.  | No change required to the Review Report.  |
| Cllr Dr Venables                                | <p>1. On page 24 it discusses how Brocastle is a strategic employment site and refers to brownfield site. However I would presume that Brocastle, although identified for this purpose is a greenfield site.</p> <p>2. On page 27 it discusses the affordable housing policy and how there are different rates in different areas. However there is no explanation of why these are different and how they were determined.</p> | <p>The comments received from Cllr Dr Venables are noted.</p> <p>In response to comment 1, it is accepted that Brocastle is a 'greenfield' site. However, paragraph 3.2.6 of the Review Report merely reflects the supporting text in the current LDP that states that the overall preference of the LDP Strategy is for the development of land within urban areas, especially on previously development 'brownfield' land.</p> <p>In response to comment 2, Cllr Venables is referred to Background Paper 8: Affordable Housing that was prepared to inform the Bridgend LDP (2013). This background paper</p> | <p>No change required to the Review Report.</p> <p>No change required to the Review Report.</p> |

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|  | <p>3. On page 39 there is a discussion of waste policies. In particular it states that several areas will be favoured including Waterton Industrial Estate. However this area is very near to residential properties in the village of Treoes, Vale of Glamorgan and Waterton and Parc Afon Ewenni, I would need reassurance that this was not going to impact on residential properties or quality of life for the area.</p> <p>4. On page 57 there is a discussion of Parc Afon Ewenni. My understanding was that PAE was from the council depot to the South Wales Police. However on page 58 there is a discussion of Land at Waterton Lane. This seems to include the council depot and seems to be a sub section of PAE and not a separate section. It refers to 666 units, but surely these are part of Parc Afon Ewenni and it should be discussed as so.</p> | <p>sets out the evidential basis from which the affordable housing policies contained in the LDP have been developed. For information purposes, the critical evidence base studies that will be required to support the Replacement LDP will include a <b>Local Housing Needs Assessment</b> – to identify how many homes are required of each tenure: open market housing and affordable housing and a <b>Affordable Housing Viability Assessment</b> – to provide advice on achievable and viable targets and thresholds for affordable housing.</p> <p>In response to comment 3, any potential or future waste facility would require a formal planning application to be submitted where issues such impact upon residential amenity would be fully considered.</p> <p>In response to comment 4, the land allocated as COM1(3) Parc Afon Ewenni in the Bridgend LDP (2013) includes the BCBC Highway Depot in the East and extends to the Waterton Roundabout in the West, incorporating the South Wales Police site. Land at Waterton</p> | <p>No change required to the Review Report.</p> <p>Typographical error: Review Report amended to refer to 42 units allocated under LDP Policy COM1(7).</p> |
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|                                 | <p>5. Also in this section there is inclusion of a current residential area, Clos Waterton, but there is no inclusion of the residential area of Waterton Lane. It would seem that the hamlet of Waterton should now be included in this discussion and the development of community facilities and other infrastructure.</p> | <p>Lane is a separate site and is allocated for 42 units COM1(7). The reference to 666 units on page 58 is a typographical error and should refer to the 42 units allocated under COM1(7).</p> <p>In response to comment 5, the reference to Clos Waterton is made in the context of development served off the 'left in, left out' junction from the A473. The residential area of Waterton Lane is accessed from Brocastle Avenue, as is the land allocated as COM1(11) &amp; COM1(14). The policies of the existing Bridgend LDP ensure that the need for additional or improved community services and facilities created by new development is addressed through the planning application process.</p> | <p>No change required to the Review Report.</p> |
| <p>Home Builders Federation</p> | <p>The HBF suggests that some additional commentary is added with regard to cross boundary issues with the three neighbouring Authorities, particularly as two of them have recently adopted their LDP's.</p>   | <p>Section 5.19 states that the most appropriate way forward that responds to local issues, maintains plan coverage and delivers the best planning outcomes, is to proceed immediately with a review and replacement of Bridgend's existing LDP whilst simultaneously working collaboratively neighbouring authorities and the region on the SDP, wherever possible sharing a joint evidence base. In addition the Delivery</p>   | <p>No change required to the Review Report.</p> |

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|  | <p>Although not explicit the plan at para. 2.2.3 – 2.2.6 contains a lot of data relating to population projections, this suggests that Bridgend Council see this as the main driver behind housing need. This section should include additional wording relating to the potential economic aspirations of the plan and the wider region which may be used to support the proposed housing requirement within the plan.</p> | <p>Agreement consultee list now includes all of the LPAs in the Cardiff Capital Region to reflect the importance of collaborative working and the importance of strategic cross-boundary issues.</p> <p>It is not considered necessary to insert additional text as requested by the HBF because the new development strategy will be informed and developed using a refreshed evidence base.</p> | <p>No change required to the Review Report.</p> |
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# LDP Review Report 2018

## Bridgend Local Development Plan 2006-2021

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