

# BRIDGEND COUNTY BOROUGH COUNCIL

## REPORT TO DEVELOPMENT CONTROL COMMITTEE

1 FEBRUARY 2018

### REPORT OF THE CORPORATE DIRECTOR - COMMUNITIES

#### Update on the response to the Cabinet Secretary's letter regarding Joint Local Development Plans and a regional Strategic Development Plan

#### 1. Background

- 1.1 On 13 December 2017 the Cabinet Secretary for Energy, Planning and Rural Affairs wrote to the Leader and Chief Executive with an invitation to give serious consideration to preparing a Joint Local Development Plan (JLDP) with other Local Planning Authorities within the South East Wales comprising Bridgend, RCT and Caerphilly. A separate letter inviting Local Planning Authorities to give serious consideration to preparing a Strategic Development Plan (SDP) was also sent on the same day. The letters are attached at **Appendix 1**.
- 1.2 The Cabinet Secretary has invited positive responses to the JLDP letter to be submitted back to Welsh Government by 28 February 2018 and until such time Welsh Government will not agree to any plan progressing individually.
- 1.3 As the content of the letters will potentially have a wide reaching impact on the Council progressing with its own LDP, it is appropriate to report the matter to Council and a more detailed report and appraisal is due to be reported to Council on 28 February 2018.
- 1.4 The purpose of this report is to update the Development Control Committee on the preparation of Bridgend County Borough Council's response to the Cabinet Secretary.

#### Joint Local Development Plans

- 1.5 On 13 December 2017 the Cabinet Secretary for Energy, Planning and Rural Affairs wrote to the Leader and Chief Executive inviting the Local Planning Authority to give serious consideration to preparing a Joint Local Development Plan with other Local Planning Authorities within the South East Wales - West Area (comprising of Bridgend, RCT and Caerphilly). This letter is attached at **Appendix 1**. The Council's response is required to be reported back to Welsh Government by 28 February 2018 and until such time Welsh Government will not agree to any plan progressing individually.
- 1.6 The timing of the Cabinet Secretary's letter has significant implications for this Authority given the imperative to start work on the review of its LDP as a matter of urgency to maintain up-to-date policy coverage post 2021 when the current LDP expires.
- 1.7 The rationale for the Cabinet Secretary's invitation is outlined in the letter and is based on the premise that a JLDP will deliver improved planning outcomes as well as sharing resources and encouraging collaboration. No evidence to support this position has been submitted however, the Council will need to consider both the potential outcomes as well as the process of how they will be achieved as part of its response.

#### ***What are the implications of preparing a 'Joint LDP'?***

- 1.8 The Bridgend Local Development Plan expires in 2021 which effectively means that the

County Borough will not have an up-to-date statutory development plan in place to guide sustainable development and prevent inappropriate forms of development. It is therefore imperative that work commences on a replacement LDP as soon as possible, however, the Cabinet Secretary's invitation to prepare a 'Joint LDP' must be given due consideration and, as such, substantive work on a replacement LDP has been put on hold.

- 1.9 In order to determine the most appropriate way forward for this Council to maintain up-to-date development plan coverage when the current Bridgend LDP expires in 2021 it is imperative that all the realistic 'options' are considered, tested and risk assessed and this is intended to inform this Council's response to the Ministerial letter. The following options are being considered:-
- Option 1: Local Planning Authorities in the region prepare a SDP only and forgo 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 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.
  - Option 5: Joint Local Plan (Incorporating RCT & Bridgend) whilst simultaneously working collaboratively with the region to prepare an SDP.

- 1.10 These options are discussed in more detail below and will be included in the report to Council on 28 February 2018.

### **Strategic Development Plan (SDP)**

- 1.11 Strategic Development Plans were introduced in the Planning Wales Act 2015 and are intended to provide a regional spatial framework for the future development and use of land within a defined region. In this case Bridgend forms part of the Cardiff Capital Region and there is broad agreement that this be taken forward as the basis for the footprint of a SE Wales SDP. This would allow larger than local issues, such as housing and infrastructure, which cut across Local Planning Authorities boundaries to be considered in a comprehensive way.

- 1.12 The SDP is currently being considered by the Leaders of the 10 South East Wales Authorities and any update on this position will be included in the report to Council on 28 February 2018.

### ***Option 1: Local Planning Authorities in the region prepare a SDP and forgo individual reviews of their respective LDPs.***

- 1.13 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 push back the adoption of the SDP until 2023 and in a worst case scenario 2024, thus potentially leaving a period of 2-3 years where Bridgend LPA could have a 'policy vacuum'. In addition a relaxation of the plan's end-date (which is also being presented as a solution to avoiding 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 most 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.

***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 to prepare a joint evidence base and with the region to prepare a SDP.***

- 1.14 Options 2 and 3 would be relatively simple and 'quick-fix' solution to avoiding a policy vacuum in Bridgend. 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.

***Option 4: Joint Local Plan (Incorporating Caerphilly, RCT & Bridgend) whilst simultaneously working collaboratively with the region to prepare a SDP & Option 5: Joint Local Plan (Incorporating RCT & Bridgend) whilst simultaneously working collaboratively with the region to prepare a SDP.***

- 1.15 Options 4 requires this Authority to prepare a Joint LDP with Caerphilly and RCT and Option 5 with RCT only. The perceived rationale for a 'Joint LDP' incorporating Caerphilly, RCT and Bridgend is based upon the respective LDPs expiring in 2021. Welsh Government makes the case that to create such an administrative planning boundary with 'cross-boundary issues' can be dealt with more effectively.
- 1.15 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. For example establishing a 'Joint Planning Board' or determining alternative suitable governance arrangements, aligning political differences and Officer working practices could take up to 2 years. Although there are planning merits to working at such a scale, as proposed by the Cabinet Secretary, there are undoubtedly practical and logistical issues that could take a considerable time to resolve. It is the view of Officers 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 basis of Bridgend/RCT and Caerphilly only.
- 1.16 In view of the governance issues described above and the delay this could create, a Joint LDP incorporating Caerphilly, RCT and Bridgend is unlikely to be adopted by 2021 therefore undermining full plan coverage and subsequently resulting in a 'policy vacuum'. Neither would a relaxation of the plan's end date beyond 2021 be a temporary solution for Bridgend until such time as a new 'Joint Plan' is in place.

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

- 1.17 Firstly, the evidence that underpins the strategy and policies would also be out of date and could easily be challenged by developers likely resulting in a situation of 'planning by appeal'.
- 1.18 Secondly, the recently published 2017 JHLAS shows that the County Borough has housing land supply, assessed against the housing requirement of the Bridgend LDP, of 4.0 years. 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. 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.

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

- 1.19 Both RCT and Caerphilly are also in a position of not having a 5 year housing land supply, however, in the case of RCT, they have a substantive number of undeveloped housing sites however, viability issues mean that it is challenging for larger developments especially in the north of RCT to proceed. Development sites are available but they are generally considered unviable.
- 1.20 In respect of Bridgend, the Annual Monitoring Report evidences that the LDP has been successful and, as such, the majority of allocations have been delivered with the exception of some challenging brownfield sites in primarily in our valley communities that have stalled due to viability issues. Effectively this means the LDP exhausted deliverable housing sites. The majority of the County Borough of Bridgend is considered as a viable location to develop by housebuilders and as such significant pressure exists from the development industry for the Council to identify new sites for residential development.

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

- 1.21 There is a significant 'risk' of an ad-hoc approach leading to a flurry of speculative planning applications from the development industry seeking to exploit the current shortfall in land supply.
- 1.22 The LPA would be in a situation of 'planning by appeal' which will have a significant impact on the Communities Directorate's budget as staff resources will be diverted and concentrated on fighting appeals. This will also lead to a lack of co-ordination of S106 monies and a risk of receiving no Section 106 monies at appeal.
- 1.23 Bridgend Local Planning Authority will have significantly less control of its planning function and Councillors will have a reduced ability to influence the future strategy for growth in the County Borough. In reality, this means that developers will be deciding where development and new homes should be built and not the Local Planning Authority. It is the Local Planning Authority's role to direct growth - to the preferred and most sustainable locations.

***Option 5: Joint Local Plan (Incorporating RCT & Bridgend) whilst simultaneously working collaboratively with the region to prepare a SDP.***

- 1.24 Option 5 (involves preparing a Joint LDP with RCT and Bridgend) 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.
- 1.25 Both Options 4 and 5 would create a geographically large LDP area covering a significant part of South East Wales. In theory, such a large administrative area would allow for 'cross-boundary' issues to be managed more effectively however, it is the role of a SDP to deal with regional wide strategic planning matters and in the interim 'cross-boundary' issues could be managed effectively through a review of the respective LDPs.
- 1.26 With a likely consensus from the region to prepare a SDP, the need for a Joint LDP incorporating RCT, Caerphilly and Bridgend requiring a new evidence base, vision and land-use strategy (sub-regional approach to planning) is considered unnecessary and unlikely to achieve better planning outcomes in the short to medium term.

- 1.27 Also, in the context of the wider Local Government Re-organisation agenda a joint plan area of Caerphilly, RCT and Bridgend would also encompass 3 separate Health Boards – ABM, Cwm Taff and Aneurin Bevan which is not considered logical and could present difficulties in alignment and engagement in the Joint LDP preparation process.

***The main 'risk' for Bridgend***

- 1.28 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 Plan' or the 'SDP' is in place.
- 1.29 An overview of all the financial and social 'risks' that are posed to both the LPA and our communities, in the short to medium term, by not having an up-to-date Local Development Plan in place by 2021 is attached as **Appendix 2**.

**2. Current Situation**

- 2.2 Discussions in respect of the Joint Local Development Plan are on-going between the respective authorities, the outcomes of which will be reported to Council on 28 February 2018.
- 2.1 Leaders of the 10 South East Wales (CCR) Authorities are considering the prospects of progressing a Strategic Development Plan and any outcomes will be reported to Council on 28 February 2018.

**3. Next Steps**

- 3.1 Officers will continue to work on the options assessment and prepare a response to the Cabinet Secretary's letter, the contents of which will be presented to Council on 28 February 2018.

**4. Recommendation**

- 4.1 That the contents of this report be noted.

**Mark Shephard**  
**Corporate Director - Communities**  
**1 February 2018**

**Contact Officer:** Susan Jones  
Development Planning Manager

Richard Matthams  
Development Planning Team Leader

**Telephone:** (01656) 643162

**E-mail:** [richard.matthams@bridgend.gov.uk](mailto:richard.matthams@bridgend.gov.uk)

**Postal Address** Development Planning, Communities Directorate  
Civic Offices, Angel Street  
BRIDGEND CF31 4WB

**Background documents**

None

## **Appendix 1 –**

**Copy of the Cabinet Secretary for Energy, Planning and Rural Affairs letter to the Leader and Chief Executive inviting Local Planning Authorities to give serious consideration to preparing a Strategic Development Plan (SDP) and for this Local Planning Authority to give serious consideration to preparing a Joint Local Development Plan.**

**Lesley Griffiths AC/AM**  
**Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig**  
**Cabinet Secretary for Energy planning and Rural Affairs**



Llywodraeth Cymru  
Welsh Government

Ein cyf : Our ref : QA1282787

Cllr Huw David and Mr Darren Mepham  
Leader and Chief Executive of  
Bridgend County Council  
Civic Offices  
Angel Street  
Bridgend  
CF31 4WB

B December 2017

*Dear Huw and Darren*

**Invitation to prepare a Joint Local Development Plan (LDP) South East Wales - West**

It is almost 14 years since the Planning and Compulsory Purchase Act (2004) introduced the requirement for Local Planning Authorities to prepare, monitor and keep review Local Development Plans. Progress has been made with 20 adopted LDPs in place.

The latest round of LDP Annual Monitoring Reports, submitted in October, has demonstrated mixed success for plans adopted between 2010 and 2015. This is particularly evident for critical planning outcomes, including supporting the delivery of housing in sustainable locations. With this in mind, it is right to pause and reflect on the correct path to take to maintain effective LDP coverage ahead of adoption of a Strategic Development Plan (SDP) for the region. It is also necessary to provide a robust framework for the delivery of the land use implications of the Cardiff Capital Region City Deal proposals.

The role of the planning system in delivering excellent outcomes for Wales at national, regional and local levels has never been more prominent. Our newly adopted National Strategy: Prosperity for All acknowledges the key role the planning system must play by recognising planning decisions as a critical lever to deliver the central goal of prosperity for all. It notes planning decisions affect every area of a person's life. They determine where homes are built, where services are provided, the quality of the local environment, the promotion of sustainable economic growth and access to open space. The right planning system is critical in delivering the objectives of the strategy – this includes ensuring better LDPs are produced in the future.

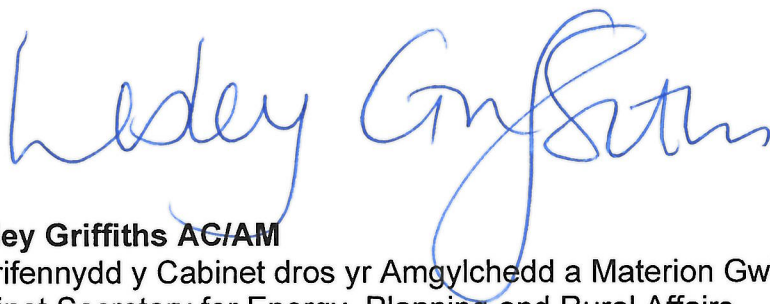


Our vision for LDPs is not just to have full plan coverage, but achieve this in the most effective and efficient way, whilst also making a real difference for people and places. This does not mean replicating the procedures of the past, such as preparing plans on an individual basis. Often this has led to lengthy timescales for preparing plans, numerous delays in the process, a lack of effective consideration for issues transcending administrative boundaries and a difficulty in demonstrating the benefits of the system. The average time taken to prepare a first generation LDP was almost 6½ years which is totally unacceptable and cannot be replicated in the future. Evidence for the Planning (Wales) Bill demonstrated the cost of preparing a LDP to be between £1.4 and £2.2 million. Since then local government expenditure on planning services declined by 53% between 2009/10 and 2016/17 as a result of the UK Government austerity programme imposed on Wales with many of these reductions borne by your LDP teams. I do not believe many authorities currently have the capacity, capability or resilience necessary to progress LDPs on an individual authority basis.

For the reasons identified above we must approach the future with a new outlook, embracing the benefits from undertaking Joint LDPs. Maximising efficiency savings, both staffing and financial; delivering better outcomes on a more consistent basis; reaping the financial benefits through economies of scale and avoiding the pitfalls of duplication and repetition are all there to be seized. For the South East Wales - West area there are significant opportunities and challenges which are best addressed through the preparation of Joint Local Development Plans. These include maximising the take up of brownfield land to strengthen communities, minimising green field site releases and ensuring comprehensive planning of development opportunities on local authority boundaries. Realising the benefits provided by new infrastructure, such as the Metro, taking advantage of increased connectivity, accessibility and resilience of public transport corridors by identifying and implementing an area wide sustainable settlement strategy will be important considerations.

This approach aligns with emerging Local Government Reform proposals and stated intention of local government to work more collaboratively in the future. For the compelling reasons set out in this letter. I invite you to give serious consideration to improving the effectiveness of the planning system by preparing a Joint Local Development Plan. I am seeking positive responses to this invitation by the **28 February 2018**. Until such time I will not agree any plan progressing individually.

Yours sincerely,



**Lesley Griffiths AC/AM**

Ysgrifennydd y Cabinet dros yr Amgylchedd a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs

Leader and Chief Executive Caerphilly County Council  
Leader and Chief Executive Rhondda Cynon Taff County Borough Council



**Lesley Griffiths AC/AM**  
Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs



Llywodraeth Cymru  
Welsh Government

Ein cyf : Our ref : QA1282787

Leader and Chief Executive of the Council

13 December 2017

Dear Colleague,

### **Invitation to Local Planning Authorities to prepare a Strategic Development Plan (SDP)**

The Planning (Wales) Act 2015 included the legislation necessary to produce Strategic Development Plans (SDPs). SDPs allow larger than local issues such as housing, employment and infrastructure which cut across a number of Local Planning Authorities (LPAs) boundaries to be considered in an integrated and comprehensive way.

The role of the planning system in delivering excellent outcomes for Wales at national, regional and local levels has never been more prominent. Our new National Strategy: Prosperity for All acknowledges the key role the planning system must play by recognising planning decisions as a critical lever to deliver the central goal of prosperity for all. It notes planning decisions affect every area of a person's life. They determine where homes are built, where services are provided, the quality of the local environment, the promotion of sustainable economic growth and access to open space. The right planning system is critical in delivering the objectives of the strategy – this includes ensuring better LDPs and SDPs are produced in the future.

SDPs have the potential to reduce complexity and repetition currently contained in LDPs and make more effective use of resources. The ability to pool resources, reduce preparation costs, undertake more joint technical work, utilise existing skills and expertise and rationalise issues crossing administrative boundaries should not be lost. SDPs are also necessary to provide a robust framework for the delivery of the land use implications of existing and emerging City Deal and Growth Deal proposals.

My vision for the development plan system is to achieve the most expedient way of maintaining LDP coverage through the production of Joint LDPs, while encouraging and facilitating a strategic approach through SDPs to deal with issues of regional importance. This is not about setting up parallel or competing plans, rather a streamlined suite of plans that complement and integrate as one.

To date, no proposals have been forthcoming. I consider preparing SDPs on a consistent basis for each of the three regions of South East, Mid and West and North Wales will ensure the most efficient use of resources, maintain an effective decision making framework and deliver high quality planning outcomes. **I am therefore inviting proposals for SDPs, based on the 3 regional footprints, to come forward.**

Yours sincerely,



**Lesley Griffiths AC/AM**

Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs



Ein cyf : Our ref: QA1282787

Arweinydd a Phrif Weithredwr y Cyngor

B Rhagfyr 2017

Annwyl Gyfaill,

### **Gwahoddiad i Awdurdodau Cynllunio Lleol baratoi Cynllun Datblygu Strategol**

Roedd Deddf Cynllunio (Cymru) 2015 yn cynnwys y ddeddfwriaeth angenrheidiol i greu Cynlluniau Datblygu Strategol. Mae'r Cynlluniau yn caniatáu i faterion mwy na materion lleol megis tai, cyflogaeth a seilwaith sy'n cynnwys nifer o ffiniau Awdurdodau Cynllunio Lleol i gael eu hystyried mewn dull integredig a chynhwysfawr.

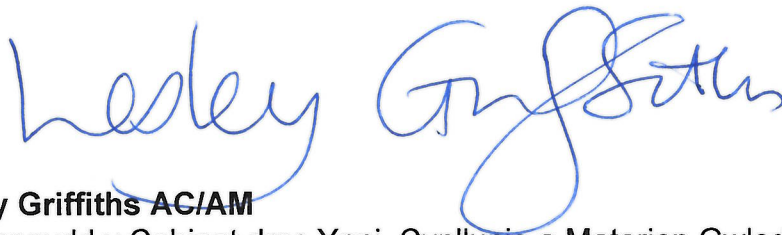
Nid yw swyddogaeth y system gynllunio wrth ddarparu canlyniadau rhagorol i Gymru ar lefelau cenedlaethol, rhanbarthol a lleol erioed wedi bod mor amlwg. Ein Strategaeth Genedlaethol newydd: Mae Ffyniant i Bawb yn cydnabod y swyddogaeth allweddol sydd gan y system gynllunio i gydnabod penderfyniadau cynllunio fel dull hollbwysig o ddarparu'r nod canolog o ffyniant i bawb. Mae'n nodi bod penderfyniadau cynllunio yn cael effaith ar bob agwedd ar fywyd person. Maent yn penderfynu ble y caiff tai ei hadeiladu, ble y darperir gwasanaethau, ansawdd yr amgylchedd lleol, hyrwyddo twf economaidd cynaliadwy a mynediad i fannau agored. Mae'r system gynllunio iawn yn hollbwysig wrth ddarparu amcanion y strategaeth - mae hyn yn cynnwys sicrhau bod Cynlluniau Datblygu Lleol a Chynlluniau Datblygu Strategol yn cael eu datblygu ar gyfer y dyfodol.

Mae gan Gynlluniau Datblygu Strategol y posibilrwydd o leihau y cymhlethdod a'r ail-adrodd sydd o fewn Cynlluniau Datblygu Lleol i wneud defnydd mwy effeithiol o adnoddau. Ni ddylid colli'r gallu i gronni adnoddau, lleihau costau paratoi, cynnal mwy o waith technegol ar y cyd, defnyddio sgiliau ac arbenigedd presennol a rhesymoli materion sy'n mynd ar draws ffiniau gweinyddol. Mae Cynlluniau Datblygu Strategol yn angenrheidiol hefyd er mwyn cynnig fframwaith cadarn ar gyfer darparu goblygiadau defnydd tir cynigion presennol a newydd Bargeinion Dinesig a'r Bargeinion Twf.

Fy ngweledigaeth ar gyfer y system cynllunio datblygiadau yw sicrhau'r dull mwyaf hwylus o gynnal Cynlluniau Datblygu Lleol drwy gynhyrchu Cynlluniau Datblygu ar y Cyd, tra'n annog a hwyluso dulliau strategol drwy'r Cynlluniau Datblygu Strategol i ddelio gyda materion sydd o bwys rhanbarthol. Nid yw hyn yn golygu sefydlu cynlluniau ar y cyd neu gynlluniau sy'n cystadlu, yn hytrach, cyfres syml o gynlluniau sy'n ategu ac yn integreiddio fel un.

Mae pedwar prosiect wedi'u cymeradwyo hyd yma. Rwy'n teimlo y bydd paratoi Cynlluniau Datblygu Strategol yn gyson ar gyfer pob un o'r tri rhanbarth, y De-ddwyrain, y Canolbarth a' Gogledd a'r Gorllewin a Gogledd Cymru yn sicrhau y defnydd mwyaf effeithiol o adnoddau, gan gynnal fframwaith effeithiol ar gyfer gwneud penderfyniadau a sicrhau canlyniadau cynllunio o safon uchel. **Rwyf felly'n gwahodd cynigion ar gyfer Cynlluniau Datblygu Lleol, yn seiliedig ar y 3 model rhanbarthol.**

Yn gywir,



**Lesley Griffiths AC/AM**

Ysgrifennydd y Cabinet dros Ynni, Cynllunio a Materion Gwledig  
Cabinet Secretary for Energy, Planning and Rural Affairs

## **Appendix 2 –**

Risks associated with not having an up-to-date Local Development Plan in place by 2021.

## **Appendix 2 – Risks associated with not having an up-to-date Local Development Plan in place by 2021.**

### Less control for Bridgend Local Planning Authority

- Bridgend Local Planning Authority will have significantly less control of its planning function and Councillors will have a reduced ability to influence the future strategy for growth in the borough. In reality this means that developers will be deciding where new homes should be built and not the Local Planning Authority. It is the Local Planning Authority's role to direct growth - to the 'right' place and not be dictated to by developers.

### Inappropriate development

- The Local Development Plan is in the final stage of its 'life-cycle' and as a result the county borough does not have a 5 year housing land supply (2017 JHLAS 4.0 years).
- It is inevitable that there will be inappropriate ad-hoc development at locations that may prejudice the future LDP strategy and a likely 'Transport Led' SDP Strategy based on the Cardiff Capital Region. In addition, there is concern that this ad-hoc approach could lead to a flurry of speculative planning applications from the development industry seeking to exploit the current shortfall in land supply to 'landbank' sites.
- The LPA would be in a situation of 'planning by appeal' which will have a significant impact on the Communities Directorates budget as staff resources will be concentrated on fighting appeals. This will also lead to a lack of co-ordination of S106 monies and a risk of receiving no Section 106 monies at appeal.

### Lower levels of new affordable homes for our communities

- The lack of an uncoordinated approach to the delivery of new homes accompanied by appropriate infrastructure for our younger generation may be significantly compromised.
- Well planned high quality homes are a vital ingredient in developing a sustainable economy. New homes play an important role in attracting new businesses to the area.

### New infrastructure and funding would be severely compromised

- New development delivers essential infrastructure for our communities. An up-to-date LDP is essential to ensure a co-ordinated approach to infrastructure delivery and the mechanism for securing scarce finances for new infrastructure.



- The current state of public sector budgets places greater emphasis on the LDP as one of the most important sources of funding for the Council through planning contributions to deliver new essential infrastructure.

#### Other issues

- The lack of a Local Development Plan would seriously compromise future external funding bids for regeneration projects that could result in the Council missing out on millions of pounds of investment.
- Risk of the current LDP not adequately taking on board new legislation, resulting in decisions that maybe challenged in the courts.
- The lack of an up-to-date LDP may compromise the LPA's ability to proceed with Compulsory Purchase Orders (CPOs).
- The Welsh Government could direct Bridgend LPA to prepare a joint LDP with another LPA which would require the setting up of a joint planning panel and risk of delaying plan coverage beyond 2021.
- Growth links to the wider region would be uncoordinated which could undermine regional aspirations and any future Strategic Development Plan (SDP).