APPENDIX 5 OPTIONS APPRAISAL – A BRIDGEND PERSPECTIVE

This appraisal uses a RAG system (red, amber & green) to show the level of impact that each of the 5 'options' has on the planning outcomes listed in the left hand column.

NOTE: Bridgend County Borough Council supports the preparation of an SDP to provide a regional spatial framework for the future development and use of land. However, this appraisal assesses the options in terms of the specific risks posed to BCBC by the absence of an early LDP Review, up until either a new joint LDP or SDP is adopted.

RED: High impact

AMBER: Medium impact
GREEN: No or minimal impact

PLANNING OUTCOMES	OPTION 1 Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs	OPTION 2 Bridgend LDP Review	OPTION 3 Collaboration 'Plus' (Bridgend, RCT & other LPAs)	OPTION 4 Joint LDP (Caerphilly, Bridgend & RCT)	OPTION 5 Joint LDP (Bridgend & RCT)
Continuous Plan coverage	•	•	•	•	•
Housing Delivery	•	•	•	•	•
Affordable Housing Delivery	•	•	•	•	0
S106 Contributions	•		•	•	•
Dealing with strategic Infrastructure issues	•	•	0	•	•
Dealing effectively with cross-boundary issues	•	•	•	•	•
Impact on a future SDP	•	•	•	•	•
Preparing a sound evidence base	•	•	•	•	•
Spatial coherence	•	•	•	•	•
Planning certainty & investor confidence	•	•	•	•	•

The most 'high impact risks' are associated with options 4 & 5.

OPTIONS	COMMENTARY	RISK
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	 Bridgend County Borough Council supports the preparation of an SDP. However, in a scenario that the adoption of the SDP is delayed, the absence of an early LDP Review would expose the LPA to the negative risks associated with a policy vacuum (or an out of date LDP). 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. In this scenario there is potentially a period of 2-3 years where Bridgend LPA will 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. A summary of the main 'risks' associated with not having an up-to-date Bridgend LDP in place by 2021 is attached as Appendix 6 to the Council report. 	
OPTION 2 –Bridgend LDP Review	 Bridgend LDP Review will be in adopted by 2021 providing up-to-date policy coverage. In the event the SDP is delayed, up-to-date development plan coverage would be in place to guide sustainable development. Bridgend Council has the budget & resources to undertake a 'speedily' and straightforward review of its LDP. The Development Planning Section is currently being re-structured to meet the challenge of preparing a review of its LDP and take a key role in the preparation of an SDP for South East Wales followed by LDP 'Lites'. Bridgend has the capacity, capability and resilience necessary to deliver a review of its LDP in 3 ½ years. 	
OPTION 3 – Bridgend & RCT (& other LPAs): Collaboration 'Plus'	 Refer to commentary – Option 2. There would be in-built flexibility for either LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by either party. The risks associated with a 'policy vacuum' would be substantially reduced compared to preparing a Joint LDP whilst still achieving the same 'planning outcomes'. 	
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	 In theory, options 4 & 5 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. 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, subsequently resulting in a policy vacuum for Bridgend with all the associated negative planning outcomes that such a situation would result in. In particular, the absence of an early LDP Review 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 	

OPTION 5 – Joint LDP (Bridgend & RCT) divert staff resources and has the potential to undermine a future underlying strategy associated with the SDP.

- Refer to commentary Option 4.
- Such a proposal is likely to result in a policy vacuum. However, in theory, the time taken to establish governance and working practices would be reduced by virtue of having one partner.



OPTIONS	COMMENTARY	SCORE
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	 Bridgend County Borough Council supports the preparation of an SDP. However, the absence of an early LDP Review resulting in a policy vacuum (or the lack of an up-to-date development plan, until the SDP is adopted) will result in an un-coordinated approach to housing delivery & its associated infrastructure contrary to the priorities of the Welsh Government. A policy vacuum or the lack of an up-to-date plan will lead to a situation of 'planning by appeal'. As such a diversion of resources to manage the subsequent appeals would occur. This is an unacceptable position for Bridgend LPA. 	
OPTION 2 –Bridgend LDP Review	 The new Bridgend LDP will be in place by 2021 providing an up-to-date framework for consistent and rational decision making ensuring a co-ordinated approach to housing delivery and its associated infrastructure. In addition, an up-to-date LDP will provide a sound platform for the delivery of 'sustainable development' which is a Welsh Government priority. Bridgend LPA has an excellent track record of housing delivery making a significant contribution to the overall housing delivery rates in Wales. This performance will continue with a 'speedily' review of its plan as an interim measure until the SDP is adopted. The Development Planning Section is confident that the 'direction of travel' would be established early in the plan process (2019/20) which would guide development to preferred sustainable locations. In addition, Officers would be working simultaneously and collaboratively with the region to prepare an SDP, therefore it is considered unlikely a future SDP strategy would be compromised. Future growth areas that cross administrative boundaries could still be managed effectively in the interests of the region until the SDP is adopted. 	
OPTION 3 – Bridgend & RCT(& other LPAs): Collaboration 'Plus'	 Refer to commentary – Option 2. In addition, there would be in-built flexibility for either LDP to progress in the event that timetables diverged because of complexities or difficulties encountered by either party. The risks associated with a 'policy vacuum' would be substantially reduced compared to preparing a Joint LDP whilst still achieving the same 'planning outcomes'. 	
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	 Housing delivery in the short to medium term is likely to be compromised, along with Welsh Government's housing renewal objectives because of the lengthy plan preparation time associated with such a plan. This will result in a policy vacuum when the exiting Bridgend LDP expires in 2021. A scenario where a policy vacuum exists post 2021 is likely to be ruthlessly exploited by the development industry. There would be significant pressure to release greenfield sites in unsustainable locations and it is likely the development industry would promote non-strategic sites that do not deliver the levels of infrastructure required to sustain the growth of the County Borough of Bridgend, contrary to the sustainability objectives of Planning Policy Wales. It is accepted that a joint LDP (incorporating Bridgend, RCT & Caerphilly) would provide the framework for housing delivery in the longer-term, however, such an approach would not deliver a regional approach to tackling the issues that the Cardiff Capital Region faces. A 'quick fix' solution that ensures up-to-date development plan coverage is required until the SDP is adopted. (Officers would be working simultaneously and collaboratively with the region to prepare an SDP, therefore it is considered unlikely a future SDP strategy would be compromised). 	
OPTION 5 – Joint LDP (Bridgend & RCT)	• Refer to commentary – Option 4. However, in theory, the risks associated with the 'lengthy plan preparation time' are reduced with one other partner.	

PLANNING OUTCOME: Affordable Housing Delivery

OPTIONS	COMMENTARY	SCORE
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	 Bridgend County Borough Council supports the preparation of an SDP. However, the absence of an early LDP Review resulting in a policy vacuum (or the lack of an up-to-date LDP) is likely to result in an un-coordinated approach to affordable housing delivery & it's associated infrastructure (in the short to medium term) compromising Welsh Government's objective to deliver an additional 20,000 affordable homes. It is accepted the preparation of an SDP will help facilitate the delivery of affordable housing in the longer-term. 	•
OPTION 2 –Bridgend LDP Review	 The replacement Bridgend LDP will be in place by 2021 providing an up-to-date framework for consistent and rational decision making ensuring an co-ordinated approach to affordable housing delivery and its associated infrastructure. Bridgend LDP has an excellent track record of delivering affordable housing which would continue with a 'speedily' review of its LDP. 	
OPTION 3 - Bridgend & RCT(& other LPAs): Collaboration 'Plus'	Refer to commentary – Option 2.	
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	• It is unlikely that such a joint LDP will be in place by 2021 because of the 'lengthy preparation time'. The absence of an early LDP Review resulting in a policy vacuum (or the lack of an up-to-date plan) would seriously prejudice the delivery of affordable housing and this position is considered unacceptable to Bridgend County Borough Council.	
OPTION 5 – Joint LDP (Bridgend & RCT)	Refer to commentary – Option 4.	

PLANNING OUTCOME: S106 contributions

OPTIONS	COMMENTARY	SCORE
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	• The absence of an early LDP Review resulting in a policy vacuum would prejudice the ability of the LPA to secure financial contributions to support the delivery of essential new infrastructure in a coordinated manner. Neither would a relaxation of the plans end date be an acceptable solution because the viability information that underpins the existing LDP would be considered out of date and subject to challenge.	
OPTION 2 –Bridgend LDP Review	Bridgend LDP has secured approximately £8m in financial contributions since the adoption of the LDP. An up-to-date LDP based on sound viability evidence would ensure a continued coordinated approach to securing financial contributions.	
OPTION 3 – Bridgend & RCT(& other LPAs): Collaboration 'Plus'	Refer to commentary – Option 2.	
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	 Both RCT and Caerphilly have an adopted CIL. This issue would need to be resolved. The absence of an early LDP Review resulting in a policy vacuum would prejudice the ability of the LPA to secure financial contributions to support the delivery of essential new infrastructure in a coordinated manner until the new joint LDP is adopted. Neither would a relaxation of the Bridgend's existing LDP's end date be an acceptable solution because the viability information that underpins the existing LDP would be considered out of date and subject to challenge. 	
OPTION 5 – Joint LDP (Bridgend & RCT)	Refer to commentary – Option 4.	

PLANNING OUTCOME: Effective Management of Strategic Infrastructure Issues

OPTIONS	COMMENTARY	SCORE
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	• The SDP will provide the mechanism for consensus to be reached on strategic and cross boundary infrastructure issues in the longer-term. However, absence of an early LDP review resulting in a policy vacuum (until the SDP is adopted) would make it a significant challenge to guide new development & its associated infrastructure to preferred sustainable locations (a requirement of Planning Policy Wales), potentially prejudicing a future SDP Strategy.	
OPTION 2 –Bridgend LDP Review	 The LDP has delivered significant levels of new infrastructure. A 'speedily' review of Bridgend's LDP will continue to provide the basis for the delivery of infrastructure in the short to medium term maintaining a sustainable approach to spatial planning. It is important to emphasise that at the same time as progressing a 'speedily' review of the Bridgend LDP, officers will be working collaboratively with other LPAs in the region to prepare an SDP thus ensuring that the respective strategies (direction of travel) align and that strategic cross-boundary infrastructure issues are identified in addition to the mechanism for dealing with them effectively. 	
OPTION 3 – Bridgend & RCT(& other LPAs): Collaboration 'Plus'	Refer to commentary – Option 2.	•
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	• A joint LDP would provide the basis for the delivery of strategic infrastructure in the medium term on a sub-regional basis. However, the need for such a large joint LDP area is considered unnecessary because the SDP will provide the mechanism for consensus to be reached on significant strategic and cross boundary infrastructure issues in the long-term.	•
OPTION 5 – Joint LDP (Bridgend & RCT)	• A joint LDP would provide the basis for the delivery of strategic infrastructure in the medium term on a 'larger than local' footprint. However, the need for such a joint LDP area is questioned because the SDP will provide the mechanism for consensus to be reached on significant strategic and cross boundary infrastructure issues in the long-term.	

PLANNING OUTCOME: Dealing effectively with cross-boundary issues

OPTIONS	COMMENTARY	SCORE
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	• It is accepted that the SDP will provide the framework for dealing with cross-boundary issues in the longer-term. However, in a scenario that the adoption of the SDP is delayed, the absence of an early LDP Review would expose the LPA to the negative risks associated with a policy vacuum (or an out of date LDP).	•
OPTION 2 –Bridgend LDP Review	• It is considered that Potential 'growth areas' that cross administrative boundaries (such as Pencoed and Llanilid) could be identified in respective LDPs in addition to the mechanisms required to manage them effectively. This would ensure that a coordinated approach to spatial planning is maintained (as an interim measure) until the SDP is adopted. The replacement LDP would be consistent with the 'direction of travel' identified in the NDF and early on in the SDP process.	•
OPTION 3 – Bridgend & RCT: (& other LPAs) Collaboration 'Plus'	Refer to commentary – Option 2.	
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	• It is accepted that in theory cross-boundary issues could be dealt with more effectively by virtue of having one larger spatial planning boundary. However, in reality the potential Pencoed /llanilid growth area is the most significant cross-boundary land-use issue that may need to be managed prior to the adoption of the SDP. This issue could be dealt with effectively by both options 2 & 3.	•
OPTION 5 – Joint LDP (Bridgend & RCT)	Refer to commentary – Option 4.	

PLANNING OUTCOME: Impact on a future Strategic Development Plan

OPTIONS	COMMENTARY	SCORE
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	Bridgend County Borough Council supports the preparation of an SDP. However, the absence of an early LDP review resulting in a policy vacuum (until the SDP is adopted) would make it challenging to guide new development & its associated infrastructure to preferred sustainable locations. Such a scenario could prejudice a future SDP Strategy.	
OPTION 2 -Bridgend LDP Review	• Officers of BCBC will be working simultaneously with other LPAs on preparing an SDP thus ensuring coherence and a regional approach. This would ensure that Bridgend LDP does not prejudice or compromise a future SDP strategy whilst maintaining up-to-date development plan coverage.	
OPTION 3 – Bridgend & RCT (& other LPAs): Collaboration 'Plus'	Refer to commentary – Option 2.	
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	 There is concern that the lengthy preparation time associated with such a joint LDP (involving Caerphilly & RCT) will result in a policy vacuum post 2021. The development industry is likely to exploit such a situation resulting in speculative inappropriate development coming forward potentially compromising a future SDP strategy and directing resources away from the preparation of the SDP to manage appeals. It is accepted that this option in the long-term would ensure coherence on a sub-regional basis, however, with the region committed to preparing an SDP the option to progress such a large Joint LDP at this juncture is considered unnecessary and will not achieve better planning outcomes compared to options 2 & 3 in the short to medium term. 	
OPTION 5 – Joint LDP (Bridgend & RCT)	 There is concern that the lengthy preparation time associated with such a joint LDP (involving Bridgend & RCT) will result in a policy vacuum post 2021. The development industry is likely to exploit such a situation resulting in speculative inappropriate development coming forward potentially compromising a future SDP strategy and directing resources away from the preparation of the SDP to manage appeals. It is accepted that this option in the longer-term would ensure coherence on a 'larger than local' basis, however, with the region committed to preparing an SDP the option to progress such a large Joint LDP at this juncture is considered unnecessary and will not achieve better planning outcomes compared to options 2 & 3 in the short to medium term. 	

PLANNING OUTCOME: Preparing a sound evidence base

OPTIONS	COMMENTARY	SCORE
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	• The majority of the existing LDP evidence base will be out of date and subject to challenge. Until the SDP is adopted, the absence of an early LDP Review would expose the LPA to the negative outcomes associated with a policy vacuum and the lack of a sound evidence base.	
OPTION 2 –Bridgend LDP Review	• The cost of an individual LDP Review is anticipated to be much lower than for the original plan, given a requirement to 'refresh' much of the original evidence base and a focus on collaboration with other LPA's on as far as possible a joint evidence base. Bridgend also has a dedicated LDP preparation budget and has been 'planning financially' for the costs of a LDP Review by setting aside funding from surplus planning application fees.	
OPTION 3 – Bridgend & RCT (& other LPAs): Collaboration 'Plus'	 Collaboration 'Plus' presents substantial opportunities for preparing the following shared pieces of evidence: Housing / Population Study; LHMA / Viability work; Employment Assessment; Retail Study; Landscape / Green Infrastructure (update of existing studies); Transport modelling / assessment; and Infrastructure Assessment / Utilities capacity. 	
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	 Such a joint LDP would require the preparation of an entirely new evidence base to reflect that Bridgend, Caerphilly & RCT would be one spatial planning area which the evidence would need to reflect. It is unlikely that existing evidence could simply be 'refreshed' and disaggregated. It could be argued that this expenditure would be better spent on the preparation of the SDP evidence base. 	
OPTION 5 – Joint LDP (Bridgend & RCT)	Refer to commentary – Option 4.	

OPTIONS	COMMENTARY	SCORE
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	An SDP will provide a regional spatial framework for the future development and use of land.	
OPTION 2 –Bridgend LDP Review	 In terms of spatial coherence a replacement Bridgend LDP would offer the flexibility for BCBC to easily adapt to any future footprints established by Local Government Re-organisation. Bridgend's travel to work and housing market areas are relatively self-contained. 	
OPTION 3 – Bridgend & RCT (& other LPAs): Collaboration 'Plus'	Refer to commentary – Option 2.	
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	 In the context of the wider Local Government Re-organisation a joint plan area incorporating, Caerphilly, RCT and Bridgend would also encompass 3 separate Health Boards – ABM, Cwm Taff and Anerurin Bevan, which is not considered logical and could present difficulties in alignment and engagement in the joint LDP preparation process. It could be argued that the capital spent on aligning resources and working practices would be wasted in the context of the wider Local Government Re-organisation agenda. It is considered unlikely that Bridgend and Caerphilly would be included in any future Local Government footprint (as part of the wider Local Government Re-organisation agenda). Bridgend's housing market area is relatively self-contained. Therefore, it is questioned as to why Bridgend has been included in a joint LDP footprint including Caerphilly. In simplistic terms people living in the wider Caerphilly area are unlikely to look to Bridgend for their housing needs and vice versa. The research report 'Exploring methods for the identification of Strategic Planning Areas' prepared by Cardiff University shows that Bridgend's travel to work area is relatively self-contained. Figure 6.2 shows limited interaction between Bridgend and Caerphilly in terms of commuting flows. Therefore, a joint LDP incorporating Caerphilly is questioned and not considered logical. In terms of environmental factors there is no spatial coherence between Bridgend & Caerphilly as highlighted in the research report 'Exploring methods for the identification of Strategic Planning Areas' prepared by Cardiff University. 	
OPTION 5 – Joint LDP (Bridgend & RCT)	• In terms of travel to work and housing market areas, it could be argued that there is more of a link between Bridgend and RCT. The interaction between the two areas may increase in time because of the potential for a growth area between Pencoed and Llanilid (RCT).	

PLANNING OUTCOME: Planning certainty and confidence

OPTIONS	COMMENTARY	SCORE
OPTION 1 – Local Planning Authorities in the region prepare a SDP and forego individual reviews of their respective LDPs.	 Bridgend County Borough Council supports the preparation of an SDP to provide a regional spatial framework for the future development and use of land. However, 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'. Without an up-to-date LDP, there is concern that the Development Management process would be severely undermined resulting in a loss of confidence in the planning system from both elected Members and the general public. 	
OPTION 2 –Bridgend LDP Review	 Successive Annual Monitoring Reports evidences that Bridgend's LDP has been successful in delivering its regeneration strategy except for a few challenging 'brownfield' sites and its housing land supply has only just dipped below the 5 year requirement demonstrating a need to identify new sites as a matter of urgency. A 'speedily' review of the Bridgend LDP would ensure that development plan coverage and investor confidence is maintained. BCBC's housing development partners have indicated a preference for Bridgend to act quickly to facilitate the identification of new sites to ensure the continued delivery of new housing development and its associated infrastructure. 	
OPTION 3 – Bridgend & RCT: Collaboration 'Plus'	Refer to commentary – Option 2.	
OPTION 4 – Joint LDP (Caerphilly, Bridgend & RCT)	Refer to commentary – Option 1.	
OPTION 5 – Joint LDP (Bridgend & RCT)	Refer to commentary – Option 1.	