

## Candidate Site Assessment Questionnaire – Summary of Key Issues Raised

The Candidate Site Assessment Questionnaire was subject to a 5 week stakeholder consultation period commencing 23<sup>rd</sup> July 2018 until 27th August 2018.

The LPA received 7 consultation responses. A summary of the key issues raised in relation to the reports is provided in the table below:

Representor	Comment	BCBC Response
Glamorgan Gwent Archaeological Trust	The inclusion of designated historic assets, and non-designated historic assets into the questionnaire would raise early stage awareness regarding potential impact or mitigation.	Noted.
Natural Resources Wales	No comment	Noted
Welsh Government	No comment	Noted
Cadw	No comment	Noted
Welsh Water	No comment	Noted
South-Wales Police: Designing out Crime Officer	No comment	Noted
Home Builders Federation	<b>Proposed Use of Site:</b> <b>If residential, please indicate number of units -</b> The HBF suggests that the form needs to provide guidance on how this should be calculated, at this stage there are so many	Agreed to provide guidance notes to accompany the questionnaire. The suggested use of standardised site densities, allowing for site specific constraints, is supported

	<p>unknowns in terms of land take would it best to just state that the calculation should be made based on 30 dwellings/ha with a 80% coverage, but also allow developers the opportunity to set out any specific constraints that would impact on the density and how it is calculated (i.e. is it based on the whole site or just the 'developable' part excluding attenuation ponds etc.)</p>	<p>to ensure the assessment of all candidate sites for residential development is undertaken on a comparable basis. Within the context of the Sustainability Appraisal (SA) being undertaken for the LDP Review, this will also allow comparable reporting of likely significant effects on housing delivery.</p>
	<p><b>Would the allocation of the site require an alteration to a settlement boundary contained within the adopted Bridgend LDP?</b>  The HBF suggests that this question and the requirement that follows is not necessary at this stage and something that the LPA would do once they have decide to allocate the site. The HBF considers that it causes extra complication and work which is not necessary at this stage in the plan process.</p>	<p>Noted – the information requested can be gained from the existing LDP and is not considered to be onerous. Responses to this question will provide an early indication of the extent of changes to settlement boundaries which would be necessary in the event that individual candidate sites are included as site allocations within the replacement Bridgend LDP. This will usefully inform the development of a new LDP settlement strategy, will take account of both the need to safeguard environmental and amenity assets and the need to deliver appropriate development which meets identified population needs. Responses received to this question will also be used to inform the assessment of likely effects within the SA of the LDP Review, including in terms of effects on housing delivery, employment generation, accessibility, placemaking, material assets and landscape and visual impacts.</p>
	<p><b>Would the allocation of the site require a change to a land-use allocation contained within the adopted Bridgend LDP?</b>  The HBF suggests that this question and the requirement that follows is not necessary at this stage and something that the LPA would do once they have decide to allocate the site. The</p>	<p>Noted – the information requested can be gained from the existing LDP and is not considered to be onerous. Responses to this question will provide an early indication of the extent of changes to land use allocations which would be necessary in the event that individual candidate sites are included as site allocations within the replacement</p>

	<p>HBF considers that it causes extra complication and work which is not necessary at this stage in the plan process.</p>	<p>Bridgend LDP. This will usefully inform the development of a new LDP settlement strategy, will take account of both the need to safeguard environmental and amenity assets and the need to deliver appropriate development which meets identified population needs. Responses received to this question will also be used to inform the assessment of likely effects within the SA of the LDP Review, including in terms of effects on housing delivery, employment generation, accessibility, placemaking, material assets and landscape and visual impacts.</p>
	<p><b>There are four questions which ask ‘Is the site located within 400m of ....’</b>  The HBF suggests that in the information box it should include the following additional wording ‘if not how far way is it’. The HBF believe that the 400m is an arbitrary figure and the required facilities could be just outside this distance. Can you advise where the 400m distance has come from is it supported by any research?</p>	<p>Agreed to add “...if not how far away is it?” to the questions.</p> <p>The distance of 400m will be used as a threshold to assess the proximity of candidate sites to key amenities, as this is recognised as being a reasonable walking distance within a 5-minute period and therefore a desirable (but not maximum) walking distance to essential amenities. 800m, equating to a 10-minute walk, is considered to be an acceptable walking distance to other amenities and is recognised as being the typical catchment of a walkable neighbourhood. Both 400m and 800m (measured from the site boundary) will therefore be used to assess the proximity of candidate sites to amenities.</p> <p>Research and publications supporting the use of the 400m and 800m distance based threshold criteria, and more widely the need to consider accessibility when assessing candidate sites, is provided within:</p> <ul style="list-style-type: none"> <li>• Guidelines for Providing for Journeys on Foot (Institution for Highways and Transport, 2000)</li> </ul>

		<ul style="list-style-type: none"> <li>• Planning for Walking (Chartered Institution of Highways and Transportation, 2015)</li> <li>• Planning Policy Wales Edition 9: Chapter 8 Transport (Welsh Assembly Government, 2016)</li> <li>• Planning Policy Wales Technical Advice Note (TAN) 18: Transport – Annexe A (2007)</li> <li>• Planning Advice Note 75: Planning for Transport (Scottish Executive Development Department, 2005)</li> </ul> <p>The OS grid references asked for on the candidate sites form will itself allow these distances to be calculated when each site is assessed. The inclusion of the 400m distance threshold on the candidate site form is therefore intended to emphasise the importance of accessibility when site promoters are considering submitting candidate sites</p>
	<p><b>Would the proposal give rise to impacts on landscape character, visual amenity or the setting of heritage assets?</b></p> <p>The HBF notes that unlike other questions in this section this question requires a subjective answer rather than a factual one, surely it is for the Council to decide if a development has an impact not the developer.</p>	<p>Noted - The inclusion of this question is intended to provide an opportunity for site promoters to directly set out the case for the allocation of their site and to explain why any potential landscape and visual impacts, or other site constraints are considered to be acceptable. Responses to the question would be used as evidence to inform the assessment of site effectiveness and likely environmental effects (in particular landscape and visual impacts) from candidate sites. The inclusion of evidence from site promoters is considered to allow for a balanced site assessment, rather than only relying upon data and evidence sourced by BCBC.</p>
	<p><b>Do you consider that the proposed use would integrate with existing surrounding uses?</b></p>	<p>Noted - The inclusion of this question is intended to provide an opportunity for site promoters to directly set out the case</p>

	<p>The HBF notes that unlike other questions in this section this question requires a subjective answer rather than a factual one, surely it is for the Council to decide if a development has an impact not the developer.</p>	<p>for the allocation of their site and to explain why impacts on settlement structure, or other site constraints, are considered to be acceptable. Responses to the question would be used as evidence to inform the assessment of site effectiveness and likely environmental effects from candidate sites. The inclusion of evidence from site promoters is considered to allow for a balanced site assessment, rather than only relying upon data and evidence sourced by BCBC.</p>
	<p><b>Is the site financially viable to come forward?</b>  The HBF suggests that this is far to open a question and the further information section does not help explain what is required. Although we are aware that there needs to be far greater emphasis on the viability of the site the HBF do not consider this is the stage at which to ask this question as there are far too many unknowns. If the Council wish to include this question then it needs to be more structured and provide an outline for how it should be answered and what information is required.</p>	<p>Noted – The further information section states that a viability assessment <b>may be</b> sought by BCBC. The decision of BCBC to do so will be based on information submitted as part of the Candidate Sites procedure. Thus, the nature of the information required will depend on the particular constraints of the site and it is premature at this stage to try to define what this may be.</p> <p>To be considered as a proposed allocation or ‘reasonable alternative’ within the SA of the LDP Review, candidate sites must be capable of being delivered within the proposed LDP period. The inclusion of this question regarding viability is intended to provide an opportunity for site promoters to explain how development on their site can be delivered within this period, as well as to inform the phasing of development within a new LDP spatial strategy</p>
	<p><b>Are there any known constraints to overcome?</b>  The HBF suggests that this question has already been asked by a number of the previous questions, it could however be reworded to require information on any constraints not identified by the previous answers to questions above.</p>	<p>Agreed that question could be clarified. Amend to “<b>Are there any <u>other</u> known constraints to overcome?</b>”</p> <p>The inclusion of this question is intended to provide an opportunity for site promoters to directly set out the case</p>

		<p>for the allocation of their site and to explain why any site constraints are considered to be acceptable. Responses to the question would be used as evidence to inform the assessment of site effectiveness and likely environmental effects from candidate sites. The inclusion of evidence from site promoters is considered to allow for a balanced site assessment, rather than only relying upon data and evidence sourced by BCBC.</p> <p>To be considered as a proposed allocation or 'reasonable alternative' within the SA of the LDP Review, candidate sites must be capable of being delivered within the proposed LDP period. The inclusion of the question regarding how any site constraints would be addressed is intended to provide an opportunity for site promoters to explain how development on their site can be delivered within this period, as well as to inform the phasing of development within a new LDP spatial strategy</p>
	<p><b>Please indicate an approximate timescale for site delivery</b>  The HBF suggests that this question should clarify whether or not the time scale includes obtaining planning permission as this is an unknown at this stage and can vary greatly. The HBF would suggest saying that planning will be presumed to take 2 years which is probably a reasonable average time.</p>	<p>Noted – The question is intended to provide a broad indication of time scale and to clarify whether there are any known constraints at this stage that may delay its delivery. To be considered as a proposed allocation or 'reasonable alternative' within the SA of the LDP Review, candidate sites must be capable of being delivered within the proposed LDP period. The inclusion of this question is intended to provide an opportunity for site promoters to explain how development on their site can be delivered within this period, as well as to inform the phasing of development within a new LDP spatial strategy</p>

	<p><b>As a general comment the HBF would also support a two stage process is adopted as per the Candidate Sites Methodology recently agreed by SEWSPG.</b></p>	<p>Noted – A review of the SEWSPG Candidate Sites Methodology by BCBC and independent consultants indicates that this methodology may not allow for a transparent site assessment process. The methodology may also struggle to demonstrate compliance with statutory requirements regarding SA, in particular the need to undertake equal and timeous assessment of both proposed site allocations and all reasonable alternatives. BCBC has therefore concluded that a bespoke site assessment methodology, developed in tandem with the SA methodology, should be used.</p> <p>Whilst promoters of sites are encouraged to provide as much information as possible as part of their initial candidate site submission, BCBC reserves the right to request further information once the Call for Sites has closed to aid the assessment process. This effectively removes the requirement for a two stage process.</p>
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