

# BRIDGEND COUNTY BOROUGH COUNCIL

## REPORT TO COUNCIL

22 JANUARY 2020

### LOCAL DEVELOPMENT PLAN PREFERRED STRATEGY CONSULTATION REPORT

#### 1. Purpose of report

1.1 The purpose of this report is to present the Consultation Report on the Local Development Plan (LDP) Preferred Strategy for Council to consider and endorse.

#### 2. Connection to corporate improvement objectives/other corporate priorities

2.1 This report assists in the achievement of the following corporate priority:

- Supporting a successful economy – taking steps to make the county a good place to do business, for people to live, work, study and visit, and to ensure that our schools are focused on raising the skills, qualifications and ambitions of all people in the county.

#### 3. Background

3.1 Regulation 15 of the LDP Regulations requires the Council to publish its pre-deposit proposals (Preferred Strategy) for public inspection and consultation before determining the content of its LDP for Deposit. Therefore, the Preferred Strategy was published in September 2019, representing the completion of a period of pre-deposit plan preparation and engagement, which influenced its development. The Preferred Strategy provides the strategic context for the preparation of more detailed policies, proposals and land use allocations that will subsequently be included in the Deposit LDP.

3.2 The statutory consultation period on the Preferred Strategy was held from 30<sup>th</sup> September 2019 to 8<sup>th</sup> November 2019 and a total of 70 formal representations were received. In preparation for the Deposit Stage of the LDP, the Council must draft an initial Consultation Report for publishing as soon as reasonably practicable after pre-deposit consultation under LDP Regulation 16A.

3.3 A Consultation Report has therefore been prepared, which outlines how Bridgend County Borough Council has undertaken public participation and consultation on the Preferred Strategy itself. The Report identifies the steps taken to publicise plan preparation, in accordance with the Community Involvement Scheme (CIS), before outlining the specific bodies engaged, summarising the main issues raised and identifying how the responses have been or will be addressed. The Report provides significant detail on how this key period of consultation will influence development of the Deposit LDP.

#### **4. Current situation/proposal**

- 4.1 A number of consultation methods were utilised to ensure efficient and effective consultation and participation, in accordance with the CIS. These methods included local advertisements, promotion on the Council's website, public document inspection, database dissemination, public exhibitions, circulation through social media, Town and Community Council engagement events and a Youth Council Open Day exhibition.
- 4.2 The Consultation Report is not intended to be a comprehensive report on each comment received, rather a summary of the key issues raised in response to the specific questions on the consultation form. A significant number of representations were also site specific in focus, although the Report does not attempt to evaluate the comprehensive merits of candidate sites. All candidate sites will be evaluated as part of the Candidate Site Assessment Methodology, which is separate to the Preferred Strategy Consultation. The Consultation Report is therefore structured around each consultation question, sets out the main corresponding points received and details the Council's subsequent responses.
- 4.3 The Consultation Report provides a detailed thematic overview of the main comments submitted by representors, although some of the key elements are summarised below for ease of reference:
- Numerous agents and developers have argued for a higher level of growth, claiming the Preferred Strategy is not aspirational enough. In particular, Lichfields have criticised the methodology applied as part of the Council's assessment of housing need, providing detailed alternative projections. However, the Consultation Report fundamentally rebuts these comments, based on the sound and robust evidence underpinning the Preferred Strategy. The Council has triangulated a range of data sources relating to post recession demographics, past employment land take up, labour demand and labour supply to robustly plan for an equilibrium between economic growth, dwellings, employment, jobs and employment land. While Lichfields have quoted the outcome of two planning appeals to substantiate their claims, the Consultation Report highlights more recent Sound Inspectors' reports, appeals and plans that have reached the opposite conclusion, thereby discrediting the weight attached to this alternative approach.
  - Challenges have been made to the deliverability of certain proposed strategic allocations and significant commentary has been provided to support or discredit sites identified in the Preferred Strategy and/or Candidate Site Register. Many of these representations question the viability and deliverability of identified sites and suggest certain proposals should be supported ahead of others. As stated in the Preferred Strategy, the identified Strategic Site Options identified are considered to have the potential to underpin the Spatial Strategy (theoretically) by accommodating sustainable housing growth and focusing development within the

Regeneration Growth Areas and Sustainable Growth Areas. The Preferred Strategy and Consultation Report clarify that the final selection of sites will be dependent on further detailed assessment work, including:

- The ability to deliver the level of supporting infrastructure required;
- A masterplanning process to ensure they create sustainable, cohesive, well-designed places delivered through a strong placemaking approach; and
- A financial viability assessment to ensure the site is deliverable within the plan period.

The Council will need to have a high degree of confidence that each allocated site has a realistic prospect of being delivered within the LDP period, including whether the site promoter has a serious intention of developing the site. In order to inform the Deposit Plan, a Candidate Site Assessment process will therefore be undertaken, which will gather suitable evidence to robustly demonstrate the viability and deliverability of each site. The Preferred Strategy document also makes it clear that site promoters will be expected to submit specific information on the viability and deliverability of sites and failure to do so could affect the prospect of site allocation.

- A number of respondents cited concerns around supporting infrastructure and the pressure new growth will place on existing settlements. Others have referred to potential strategic sites and shared doubts that they would be able to provide adequate supporting infrastructure. The Preferred Strategy has sought to identify and differentiate between the sustainability of places by developing a settlement hierarchy; apportioning growth towards settlements that demonstrate strong employment, service and transportation functions. These settlements are therefore considered to be the most conducive to accommodating growth in a sustainable manner. Planned development will be of an appropriate scale and nature in relation to local housing and employment needs, sympathetic to local character, beneficial to the local community and deliverable with accompanying and identified major infrastructure investment. An infrastructure capacity assessment will be conducted for strategic sites to identify key infrastructure needs such as education and highways contributions. This process is necessary in order to foster sustainable communities at a scale capable of incorporating a mix of complementary uses (notably a new primary school as a minimum on strategic sites) that enhance communities. Strategic Policy 10 of the Preferred Strategy states that all development proposals should be supported by adequate existing or new infrastructure. This is fundamental in order to mitigate likely adverse impacts and to integrate a development proposal within its surroundings. The Council will ensure, through conditions and legal agreements referenced in the Replacement LDP, that the infrastructure is in place to

accommodate new developments or financial contributions are provided by developers where necessary.

- Several representors have questioned why certain greenfield sites are being considered for development and suggested pursuit of a 'brownfield only' strategy instead. Conversely, many developers, site promoters and consultants have argued for consideration of additional greenfield sites. The overall aim of the Preferred Strategy is to prioritise the development of land within or on the periphery of urban areas, especially on previously developed brownfield sites. Porthcawl, Maesteg and the Llynfi Valley will therefore continue to remain regeneration priorities through their designation as Regeneration Growth Areas. This will enable delivery of a range of mixed-use developments and facilities, accompanied by more community based Regeneration Areas within the Ogmore and Garw Valleys. However, given the existing LDP's success in delivering development on brownfield land in other settlements, further regeneration opportunities are now somewhat limited. The Preferred Strategy therefore proposes to allocate additional viable and deliverable sites (including some greenfield sites) in order to ensure the County Borough's future housing requirements can be delivered. For these reasons, accompanying growth will be channelled towards Bridgend, Pencoed and Pyle/Kenfig Hill/North Cornelly in recognition of their positions in the Settlement Hierarchy and capacity to accommodate growth in a sustainable manner. Designation of these settlements as Sustainable Growth Areas will provide a means of supporting their existing services and facilities, enabling delivery of associated infrastructure and capitalising upon their location on the strategic road and rail network, promoting transit orientated development.

4.4 The Consultation Report provides significantly more detail on the issues raised, how the responses have been or will be addressed and ultimately how this key period of consultation will influence development of the Deposit LDP. In addition, further consultation activity is provided in the appendices. **Appendix 1** summarises the issues and comments raised by Town and Community Councillors at the related Engagement Events facilitated by Planning Aid Wales. **Appendix 2** details the feedback and discussions held at the Youth Council Open Exhibition Day. **Appendix 3** outlines the bodies engaged at this stage of consultation and **Appendix 4** (attached separately to the Consultation Report) contains all representations received during the Preferred Strategy Consultation Period.

## **5. Effect upon policy framework and procedure rules**

5.1 The Planning and Compulsory Purchase Act 2004 and regulations of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 requires that a Local Planning Authority must commence a full Review of its LDP every 4 years.

## **6. Equality Impact Assessment**

- 6.1 There are no direct implications associated with this report. However, the policies contained within the Replacement LDP will require an equalities impact assessment to be carried out.

## **7. Well-being of Future Generations (Wales) Act 2015 implications**

- 7.1 The Replacement LDP will be prepared in accordance with the 7 Wellbeing goals and the 5 ways of working as identified in the Act.

## **8. Financial implications**

- 8.1 The cost of the ongoing LDP Review will be met from the Development Planning budget and carried out by development planning staff with expert advice and evidence procured from consultants and through collaboration with neighbouring authorities as required.

## **9. Recommendation**

- 9.1 That Council endorse the contents of this report. Approval will be sought from Council prior to publishing the Deposit Plan for formal public consultation.

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**22<sup>nd</sup> January 2020**

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**Background Documents:** None