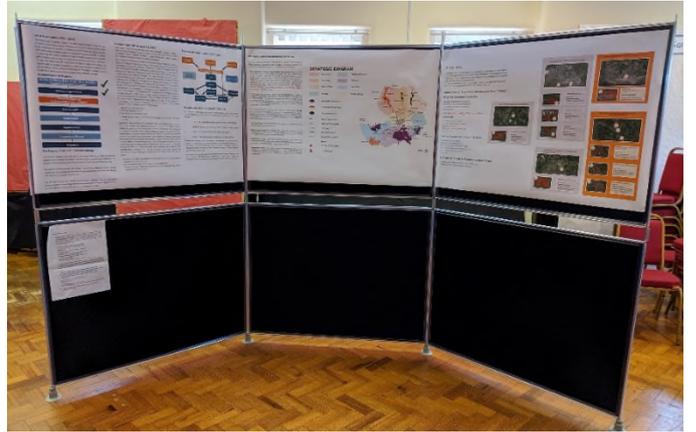




# Bridgend Replacement Local Development Plan 2018-2033



## Deposit Consultation Summary Report 2022

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## 1. Introduction

- 1.1 In accordance with the Replacement Delivery Agreement and Local Development Plan (LDP) Regulation 17, the Deposit Replacement LDP was published and subject to public consultation from 1<sup>st</sup> June 2021 to 27<sup>th</sup> July 2021. This Summary Report has been prepared to provide an overview of the key issues raised in response to the specific questions on the consultation form. Detailed responses to all representations received during the public consultation period are provided in the full Replacement LDP Deposit Consultation Report.
- 1.2 A separate Representations Register has also been published, which provides a copy of the duly made representations (1,221 in total) that were received by the Council during the Deposit public consultation. That Register has been published in accordance with Regulation 19 of the Town and Country Planning (Local Development Plan) (Wales) Regulations 2005 and can be viewed [here](#). Please note that every effort has been made to redact personal information such as addresses, signatures and other private contact details. Individual names of members of the public have also been redacted.
- 1.3 While the Replacement LDP is being prepared, the existing LDP (adopted September 2013) remains extant and will continue to provide the policy framework by which planning applications will be determined. This will remain the case until the point at which the Replacement LDP 2018-2033 is formally adopted by the Council. Once adopted, the Replacement LDP will express, in land-use terms, the wellbeing objectives and priorities of the Bridgend Public Services Board's Well-being Plan.

## **2 Summary of Deposit Consultation Representations (LDP Regulation 17)**

2.1 This section provides an overview of the main findings of the public consultation exercise on the Replacement Deposit LDP. It 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. This section is structured around each consultation question, sets out the main corresponding points received under thematic headings, together with the Council's subsequent responses.

### **1. Do you have any comments to make on the Key Issues and Drivers, Vision and Objectives of the Deposit Replacement LDP?**

2.2 Numerous representors commented that the Key Issues, Drivers, Vision and Objectives appear to be positive, appropriate and accurately reflect local issues that have strategic land-use implications for the County Borough. Certain representors felt the objectives had been robustly prepared to set out the land use planning commitments needed to accommodate growth and development needs over the plan period in line with national policy, guidance and legislation. Other commentators emphasised that the Key Issues, Drivers, Vision and Objectives clearly identify the relevant evidence base used to formulate the emerging plan, whilst acknowledging the progression since development of the Preferred Strategy. Support was also cited for certain settlements being identified as the key or main settlements, in recognition of the fact that they act as hubs for services, employment, housing and retail. It was stressed that the Key Issues, Drivers, Vision and Objectives clearly recognise the pivotal role that these settlements have in spreading prosperity to the surrounding communities.

2.3 However, several members of the public felt there was a mismatch between Strategic Objective 4 'To Protect and Enhance Distinctive and Natural Places' and several proposed housing developments, particularly in relation to specific sites within or at the edge of existing settlements. Concerns were raised that the Replacement LDP placed too much emphasis on development and not enough on protecting the countryside, green spaces and existing habitats, thereby rendering the objectives incompatible. However, the Strategic Objectives have been defined to reflect identified key issues, align with national policy and ensure an appropriate balance between the different elements of sustainability. They are cross-cutting in their nature and cross-reference the goals and objectives of the Well-being of Future Generations (Wales) Act 2015 and Bridgend Local Well-being Plan. Acting together, the Vision and Strategic Objectives provide an overarching framework to underpin all other components of the Replacement LDP.

- 2.4 Conversely, other representors felt Specific Objective 2c (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) lacked ambition. It was argued that this objective reflected the ‘minimum requirement’ in terms of meeting national policy and suggested that the Plan should identify the role new housing has to play in supporting economic growth, locally and regionally. However, this view is not supported by the Council. As documented within the Strategic Growth Options Background Paper, a range of growth scenarios were analysed and subsequently refreshed to determine the most appropriate level of growth to deliver the Replacement LDP’s Vision, Key Issues, Aims and Objectives.

## **2. Do you have any comments to make on the growth strategy?**

### Over-Development and Out-Commuting

- 2.5 Numerous members of the public opposed the level of growth in the Replacement LDP, citing concerns that the growth strategy seeks to transform Bridgend into a commuter belt for Cardiff and the M4 corridor. The same representors were generally opposed to growth in Bridgend County Borough *per se*, suggesting it was not necessary or desirable for the locality to grow any further.
- 2.6 However, the first release of data from the 2021 Census has shown that towns and cities on the M4 corridor in south east Wales are growing rapidly, with Bridgend's population growth (4.5%) being the third highest in Wales after Newport (9.5%) and Cardiff (4.7%). The population of Bridgend has increased from 139,178 at the time of the 2011 Census, to 145,500 at the time of the 2021 Census. These demographic pressures drive the need for housing growth across the County Borough and the Replacement LDP is the fundamental tool to accommodate this growth by planning for sustainable development. If the Replacement LDP did not plan for growth, this would result in lack of investment in infrastructure, insufficient affordable housing provision, out-migration of economically active households and an increasingly ageing local population. In turn, this could impair the County Borough’s ability to attract and retain employers and risk economic decline. The Replacement LDP’s Growth Strategy is considered the most appropriate to achieve a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the region. This will support economic growth, enable the delivery of key infrastructure, secure affordable housing and improve connectivity without resulting in over-development. One of the key aims of the Plan is to minimise the need for out-commuting and promote sustainable development grounded in placemaking principles. The relationship between household formation, housing requirements and employment provision has been very carefully considered to this end. The level of growth proposed is considered the

most appropriate to achieve an equilibrium between new homes and employment provision, balanced against other key infrastructure requirements, and connected through enhanced active travel opportunities. Therefore, the Replacement LDP does not seek to transform Bridgend County Borough into a commuter area for Cardiff and the M4 corridor, indeed, this would completely oppose what the strategy is seeking to achieve. Refer to the Strategic Growth Options Background Paper and Employment Background Paper.

### Growth Level

2.7 Similarly, other representors cited the level of housing completions in recent years, outlined how this has changed the identify of Bridgend and considered it disproportionate to add further homes to the area during the next plan period. In order to substantiate these points, these representors quoted ONS data, derived from 2011-baed principal projections, to suggest that only 2,000 houses are needed to meet housing needs from 2018-2033. It was also suggested that this level of development could be solely accommodated on the proposed brownfield sites in the Replacement LDP. It must firstly be noted that 2011-based projections have now been updated several times, and, as documented within the Strategic Growth Options Background Paper, the Replacement LDP has considered the full suite of 2018-based household projections along with a range of variants in arriving at an appropriate dwelling requirement. Moreover, pursuit of a 2,000-home dwelling requirement would necessitate a three times reduction in dwelling completions compared to that witnessed over the existing LDP period. It would also require pursuit of a growth strategy that is 65% lower than the 2018-based principal household projection. This approach would categorically fail to address the Vision, Aims and Objectives that the Replacement LDP is seeking to address and therefore would represent a high-risk strategy that is likely to be found unsound at examination. It would also fail to align with Bridgend's designation as a National Growth Area within Future Wales. The proposal to reduce the housing requirement to 2,000 homes over the plan period is therefore not supported.

2.8 There were few representations that stated the proposed housing requirement was too low, with many other representors considering the level of homes and jobs proposed to be well justified to inform the housing requirement. Notably, Welsh Government commented that,

“the level of household growth proposed in the Deposit LDP is 7,575 dwellings over the plan period, an uplift of 1,905, or 33% over the 2018 principal projections. This degree of aspiration aligns with Bridgend being within a national growth area. This is supported by 71.9ha of employment, looking to deliver 7,500 jobs, thereby retaining the younger cohort of employees. Collectively, these approaches support Bridgend as having a key role in the national growth area, aligning with the NDF”.

These comments are noted and only further serve to evidence the appropriateness of the proposed growth strategy.

- 2.9 Nevertheless, and conversely, some commentators felt the Plan lacked ambition or aspiration. Several representors stated that a minimal level of growth was being planned for, although these comments seemingly overlooked the fact that the level of growth proposed is 33% higher than the 2018-based principal projection. In practice, a range of growth options were considered during plan preparation, as detailed within the Strategic Growth Options Background Paper. The Replacement LDP identifies an appropriate plan requirement to enable a balanced level of housing and employment provision that will achieve sustainable patterns of growth, support existing settlements and maximise viable affordable housing delivery. Such comments that the Plan lacks ambition or aspiration are therefore considered unfounded and are not supported.

#### Flexibility Allowance

- 2.10 Whilst most representors were supportive of a significant flexibility allowance, some recommended setting a dwelling requirement that includes both the proposed housing requirement and the flexibility allowance as a minimum. However, the flexibility allowance has been set to ensure there is sufficient flexibility above the housing requirement to account for non-delivery and unforeseen issues in accordance with the Development Plans Manual. The allowance itself does not form part of the 'minimum requirement', it has been set in recognition of the fact that there may be certain specific circumstances, unknown at the plan making stage, that delay the delivery of sites, notwithstanding the robust frontloading of site delivery evidence.
- 2.11 Post Deposit Stage, the Replacement LDP has been refined to incorporate a significant 13% flexibility allowance. This will ensure the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur. The Council considers that the total level of housing provision is set appropriately within the Replacement LDP, as set out in the Housing Trajectory Background Paper, and agreed with the Housing Trajectory Stakeholder Group.

### **3. Do you have any comments to make on the spatial strategy?**

#### Overall Spatial Strategy

- 2.12 Numerous representors were broadly supportive of the spatial strategy, although some suggested a slightly different spatial weighting of growth. Other representors suggested expanding certain growth areas (to include nearby local settlements) and some felt that options for growth were limited with the Plan only identifying 1 Primary Settlement and 4 Main Settlements.
- 2.13 Such suggestions were primarily intended to justify inclusion of alternative sites being promoted by the respective representors. However, these proposals and

concerns are not supported by the Council. The Spatial Strategy is justified in the Spatial Strategy Options Background Paper, the final selection of proposed allocations is detailed within the Candidate Site Assessment and the Replacement LDP identifies the level of growth attributable to Local Settlements outside of Growth Areas. Indeed, Welsh Government concluded that,

“The LDP has undertaken a settlement hierarchy analysis, concluding that Bridgend is the primary settlement, identifying secondary settlements, as well as directing regeneration to Porthcawl and Maesteg. The Valleys (including Maesteg) are identified in Policy 1 (NDF). The approach of focusing growth in the relevant tiers of settlements, according to service and facility provision is in direct alignment with Policy 2 (NDF) assisting the regeneration of underperforming settlements. This urban focussed approach, based on strategic place making, whilst also seeking to redress regeneration issues compliments the approach set out in the NDF”.

#### ‘Roll Over’ Allocations

- 2.14 Several representatives also raised concerns regarding the number of significant brownfield sites that have been ‘rolled over’ from previous plans, with references made to site deliverability history. These concerns extended to sites within Porthcawl, Bridgend, and Maesteg. Such representatives suggested that the Council should consider allocating an alternative mix of sites, including more greenfield sites, to ensure delivery rates can be sustained over the plan period.
- 2.15 However, these views are not supported by the Council. Before being ‘rolled over’ into the Replacement LDP, all existing allocations were subject to robust re-assessment of their sustainability, deliverability and viability credentials in the same manner as all other candidate sites. While flood risk issues have now necessitated removal of one ‘rollover site’ from the housing trajectory (Parc Afon Ewenni, Bridgend), the Porthcawl Waterfront allocation is still considered deliverable based on detailed technical evidence. There has been a substantial change in circumstances to demonstrate Porthcawl Waterfront can be delivered over the Replacement LDP period and the site is therefore included as a component of housing supply within the housing trajectory.
- 2.16 In contrast, there are also three brownfield regeneration allocations within the existing LDP that the Council intends to re-allocate as Long-Term Regeneration Sites. These include Maesteg Washery, Coegnant Reclamation Site (Caerau) and the Former Cooper Standard Site, Ewenny Road (Maesteg). The retention of such sites represents a necessary degree of continuity with the first adopted LDP, although the Plan’s housing trajectory will not be dependent on delivery of these Long-Term Regeneration Sites. This approach recognises that they require longer lead-in times, preparatory remediation-based enabling works and/or more detailed strategic master plans before they can come forward.

- 2.17 Given the existing LDP's success in delivering development on brownfield land, it is recognised that there are limited, viable brownfield development opportunities remaining. Some additional viable and deliverable greenfield sites will be required to ensure the County Borough's future housing requirements can be realised. Indeed, post Deposit Stage, an alternative greenfield, developer-led site (Heol Fach, North Cornelly) has now been proposed for incorporation within the housing trajectory to bolster delivery in the short-term. However, proposals to overlook the remaining viable brownfield opportunities in favour of additional greenfield allocations is not supported, is out of accord with the Spatial Strategy and contradicts national policy. Refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper, Candidate Site Assessment and Minimising the Loss of the BMV Agricultural Land Background Paper

### Porthcawl

- 2.18 In addition to the above, some representors objected to the regeneration-led only strategy for Porthcawl on the basis that reliance on Porthcawl Waterfront is 'exceptionally high risk' and there are no fall-back options to allow for additional housing provision in the settlement. Other representors similarly referenced the fact that the Porthcawl Waterfront site has not been delivered hitherto and yet accounts for a significant proportion of Replacement LDP's total housing requirement. Several of these representors therefore suggested amending the spatial strategy to enable allocation of several additional greenfield sites on the periphery of Porthcawl instead. However, these objections are not supported by the Council and are out of accord with the Plan's Spatial Strategy.
- 2.19 Porthcawl has been identified as a Regeneration Growth Area as it demonstrates capacity to accommodate growth in a sustainable manner, via the significant brownfield redevelopment opportunity remaining within the existing settlement boundary. This represents considerable potential to attract regeneration-based inward investment that will address a broad range of socio-economic issues and complement community-based regeneration initiatives within Porthcawl. As aforementioned, a detailed body of evidence has been gathered to demonstrate there has been a substantial change in circumstances with regards to the deliverability of Porthcawl Waterfront. This evidence clearly demonstrates the site is a viable, deliverable allocation. The Strategy will enable the site to come forward, maximise affordable housing delivery in a high housing need area and enable delivery of mixed-use development on brownfield land. This approach accords with the site search sequence outlined in national policy, seeks to minimise pressure on BMV agricultural land and contributes to the full plethora of sustainable placemaking principles detailed in PPW. As such, and as justified in the Spatial Strategy Options Background Paper, the Strategy for Porthcawl is considered sound and the proposal to overlook the regeneration of a viable brownfield site in favour of greenfield sites at the edge of Porthcawl is not supported.

## Site Typologies

- 2.20 Several representors cited concerns that the Plan is over-dependent on strategic sites, whilst simultaneously advocating a spatial strategy comprising of a broader range of smaller, edge of settlement housing allocations. It was suggested that this approach would enable growth to be delivered earlier in the plan period as smaller sites can come forward more quickly than larger, strategic sites. It must be acknowledged that such comments were typically made by representors promoting sites that had not been proposed for allocation within the Deposit Plan. However, the proposal to place a greater reliance on small to medium sized greenfield sites *per se* is not supported. A Plan with too many smaller sites is more likely to have an adverse impact on local communities. It is often more difficult for such sites to provide their own supporting infrastructure until they reach sufficient critical mass and this approach could risk exacerbating local infrastructure problems.
- 2.21 The Replacement LDP primarily seeks to deliver several large-scale Sustainable Urban Extensions that will incorporate a mix of complementary uses and deliver improvements to existing infrastructure and/or provide new supporting infrastructure. This latter factor is particularly notable given the school capacity issues across the County Borough and the need for new strategic sites to be significant enough in scale to support provision of a new primary school as a minimum. A limited number of smaller site allocations were proposed at Deposit Stage (refer to Policies COM1(2)-COM1(5)), although only where capacity was clearly demonstrated to accommodate the respective level of growth and/or infrastructure improvements could be provided in support of the developments.
- 2.22 Post Deposit Stage, a suitable opportunity was identified to bring forward an additional, smaller, developer-led site (255 dwellings at Heol Fach, North Cornelly) in accordance with the Replacement LDP's Strategy. The site will bolster housing delivery in the short-term, thereby addressing some of the concerns cited by representors. However, this site's impact on the local community has been carefully considered in terms of supporting infrastructure (refer to the Infrastructure Delivery Plan), education capacity (refer to the Education Background Paper) and affordable housing provision (refer to the Affordable Housing Background Paper). Incorporation of this site plus the four sites included at Deposit Stage will ensure the plan is not over-dependent on strategic sites and delivery can come forward in the shorter term. The final selection of proposed allocations is detailed within the Candidate Site Assessment. The housing trajectory is considered deliverable, as detailed within the Housing Trajectory Background Paper.

#### **4. Do you have any comments to make on design and sustainable placemaking policies?**

##### Good Design and Density

- 2.23 Some representors argued that the the term ‘Good Design’, as used within SP3, needs to be more clearly defined. Reference was made to the fact that the level of placemaking achievable by a development will depend on its scale and location, and, that it would be unlikely for all sites to be able to meet all criteria within this policy. However, the Replacement LDP seeks to maximise its contribution to well-being through Sustainable Placemaking and Good Design, in accordance with PPW and the definitions therein. Whilst these comments are noted, the policy is considered appropriate in its current form.
- 2.24 Similarly, other representors stated that Policy COM6 is too vague as it fails to define what are higher and lower densities for new housing development. It was argued that the policy should provide a clearer understanding of the densities appropriate within different parts of the County Borough and what constitutes ‘an efficient and appropriate density’. However, rather than specifying a numeric requirement, COM6 sets the framework to make the most efficient use of land based on the site-specific context. This seeks to ensure an appropriate balance of uses can be pursued in a manner that maximises the density of developments without compromising the quality of the living conditions provided. The policy wording is therefore considered appropriate in its current form.

##### Masterplans

- 2.25 Reference was made to the fact that many of the allocations are well advanced in the master planning / pre-application process and Welsh Government commented that a visual element would enhance PLA1-5, through masterplans, concept and/or schematic frameworks. It was felt that “this will enable all parties to understand how the sites will be developed in broad terms, such as proposed land uses, access, infrastructure requirements, constraints and areas of protection”. These comments are noted and accepted. Illustrative masterplans will be appended to the Replacement LDP to enhance clarity in these respects. The final masterplans will be refined as part of future planning applications in accordance with the respective masterplan development principles detailed in Policies PLA1-5.

##### Energy Efficiency and Zero Carbon

- 2.26 Certain representors called for all new buildings (enabled under the Replacement LDP) to be examples of high sustainable design and construction practices. Indeed, SP3 states that development must contribute to creating high quality, attractive, sustainable places that support active and healthy lives and enhance the community in which they are located, whilst having full regard to the natural, historic and built environment. Development proposals must maximise

opportunities for renewable or low carbon energy generation, incorporating resource efficient/adaptable buildings and layouts using sustainable design and construction techniques. SP4 also requires all development proposals to make a positive contribution towards tackling the causes of, and adapting to the impacts of Climate Change. However, some representors cited concerns with the requirements of this policy in terms of how it will be measured and also the associated financial implications. While these comments are noted, as specified within SP4, all applications for development proposals must clearly demonstrate how they contribute to climate change mitigation and adaptation through application of the criteria-based policies. The policy wording is considered appropriate in its current form.

2.27 Other representors emphasised the importance of ensuring 'green technologies' are utilised in development, to maximise scope for a zero carbon footprint. The Council has an aspiration for all new homes to be net zero carbon. The Bridgend Local Area Energy Strategy and Renewable Energy Assessment (REA) identifies those areas considered to be suitable for development for district heat, hybrid and electric-heating solutions in combination with different levels of targeted fabric retrofit. Policy ENT10 outlines a sequential approach that requires new major development to demonstrate sustainable heating and cooling systems have been selected in the first instance, where technically feasible and financially viable.

2.28 Conversely, some private developers were opposed to certain requirements of ENT10, particularly the requirement for an energy masterplan on all major development (10 dwellings or more). It was instead suggested that a higher threshold should be used as it is not viable to incorporate low carbon heating technologies on small sites. However, the requirement for new major development to be accompanied by an energy masterplan follows the advice contained within Planning Policy Wales (Edition 11) and is considered appropriate.

## **5. Do you have any comments to make on the active, health, cohesive and social communities policies?**

### Affordable Housing

2.29 Several representors queried if the affordable housing to be secured through the Replacement LDP will be built in high need areas and whether it will be truly affordable for local people. In response, the LHMA has directly informed the Spatial Strategy, which seeks to maximise affordable housing delivery in high-need areas (refer to the Strategic Growth Options Background Paper). Affordable housing contributions will be sought on residential developments as set out by COM3. New housing developments must incorporate an appropriate mix of house types, sizes and tenures to cater for the range of locally identified housing needs. All affordable housing provision delivered via the Replacement LDP will

comply with the definition outlined in Technical Advice Note 2 and be secured through an appropriate s106 agreement to ensure the resultant products are usefully affordable.

- 2.30 Several representors cited support for the affordable housing targets detailed within COM3. However, other representors queried why the proposed affordable housing requirements are higher for some strategic sites than in the respective housing market areas more generally. The rationale for the area-based and site-specific policies is clearly set out within the Affordable Housing Background Paper. Within any broad housing market area, there will inevitably be pockets of higher or lower viability. Hence, in addition to the area-wide affordable housing requirements within COM3, there are also site-specific affordable housing requirements. The former are based on the Plan-Wide Viability Assessment, the latter are based on site-specific viability testing, which has involved analysis of more specific costs, constraints and site requirements. This dual-faceted approach is paramount to ensure Council's aspirations for delivering high-quality new communities are both realistic and deliverable.
- 2.31 Other representors supported inclusion of the Affordable Housing Exception Site Policy (COM5), although objected to the ten dwelling 'limit' detailed within the policy wording. These representors considered it necessary for a more flexible policy to 'meet the identified affordable housing need', whilst referring to purposely selected policies from some other local plans as further justification. However, the Council considers that these representors have misinterpreted the purpose of proposed COM5. The Replacement LDP will seek to deliver the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. COM5 does not seek to promote significant levels of affordable housing development outside of settlement boundaries to contribute to this target, rather provide a mechanism to meet pressing housing need in limited, exceptional circumstances. Any resultant development will still need to have reasonable access to local community services and facilities in nearby settlements and meet the specified criteria. A 10-unit cluster is considered the maximum appropriate size for a sustainable cluster of affordable housing on larger housing developments and is equally applicable to an exception site. Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities, particularly in a countryside setting. Whilst some exception policies in alternative local plans may indeed prescribe a different threshold, they are not directly applicable to the Bridgend context. Proposed Policy COM5 will provide a means of meeting very specific identified housing need, small in scale and exceptional in circumstance. No sound justification has been provided to remove the 10 affordable unit limit within Policy COM5 and this proposal is therefore not supported. Refer to the Affordable Housing Background Paper.

2.32 Other representors (primarily private developers) challenged the detailed policy requirements for affordable housing clusters of no more than 10 units on mixed-tenure strategic sites. It was argued that this figure should be more flexible to allow for site-specific circumstances and to avoid potential RSL management issues with 'smaller' clusters. However, this suggestion is not supported and clusters of up to 10 units are not considered 'small' in this context. Indeed, clusters of this nature are actually designed to assist with management of affordable housing in a more sustainable manner than 'pepper potting' single units throughout developments. Equally, discrete clusters of more than 10 affordable units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities. Large concentrations of affordable housing within certain parts of residential sites can lead to stigmatisation, social disintegration and unstable communities. As such, the proposed approach is already considered flexible enough and adaptable to site-specific circumstances, having been devised considering routine discussions with RSL housing managers that operate across the region. Refer to the Affordable Housing Background Paper.

#### Windfall Allowance

2.33 Some representors raised concerns over the Plan's windfall allowance (for both small and large windfall sites), on the basis that it is subject to unallocated sites becoming available, market fluctuations and land availability. However, the future windfall extrapolation rate has been carefully considered and is based on robust evidence. Firstly, A fifteen-year average was calculated over the whole existing LDP period (2006/07 to 2020/21), which encompasses the recession, the subsequent repercussions and the following years of economic recovery. Secondly, the Replacement LDP seeks to broadly continue with the existing LDP's Regeneration-Led Strategy (along with some additional sustainable growth), and maintain similar settlement boundaries, thereby rendering past windfall completion trends a robust reference point. Thirdly, an Urban Capacity Study (UCS, 2020) was published alongside the Deposit Plan to provide further analysis of the potential urban capacity of the County Boroughs' settlements for housing to evidence the expected small and windfall site allowance rate. This was updated in 2022 and identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this component of housing supply. The small and windfall site allowance rate is therefore considered both realistic and deliverable. It also serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP. The concerns raised are therefore unsubstantiated and not supported. Refer to the Housing Trajectory Background Paper and UCS (2022).

### Recreation Space

- 2.34 Several concerns were raised regarding new development *per se* and the loss of public open space, particularly in relation to the negative impact this could have on the wellbeing of residents. However, the Council has undertaken an updated Outdoor Sport and Children's Play Space Audit (2021), which is a quantitative analysis of existing formal and informal provision compared with the benchmark standards endorsed by Fields in Trust (FiT). The Audit has a dual purpose and can be used as a means of safeguarding or enhancing existing facilities, whilst also providing evidence to justify the provision of new facilities and/or remedy local deficiencies in provision as appropriate. Proposed Policy COM10 requires provision of a satisfactory standard of outdoor recreation space on all new housing developments. Equally, the proposed Thematic Policies (PLA1-PLA5) detail site-specific requirements for the mixed-use Strategic Development Sites in this respect. On-site provision must comply with the accessibility benchmark standards set out in the Outdoor Recreation Facilities and New Housing Development SPG.
- 2.35 The Council has also undertaken a Green Infrastructure Assessment to guide and shape the planning and delivery of green infrastructure throughout the County Borough. The assessment summarises the findings of the aforementioned Audit, whilst also adopting a holistic approach to include green infrastructure assets (such as allotments, cemeteries, woodlands, broad habitats) and the Integrated Network Maps. As such, the assessment will provide a mechanism to ensure green infrastructure forms an integral and significant part of development and wider infrastructure proposals. Development proposals, including strategic site allocations, will be expected to maintain, protect and enhance Bridgend's green infrastructure network and ensure that individual green assets are retained wherever possible and integrated into any new development.

### Supporting Infrastructure

- 2.36 Lack of existing infrastructure was commonly mentioned by representors as a reason to resist any further growth within the County Borough. Many members of the public raised concerns with the impacts additional housing could have on school capacities, primary healthcare, traffic congestion, utility provision and other community infrastructure. However, the provision of supporting infrastructure to accompany growth has been a primary consideration throughout preparation of the Replacement LDP. Infrastructure providers have been engaged at key stages and an Infrastructure Delivery Plan (IDP) has been produced, which provides a single schedule of all infrastructure necessary to render development acceptable in planning terms. All allocations will need to deliver appropriate supporting infrastructure, as referenced within the IDP, to enable the quantum of proposed development within the plan period to proceed. Without exception, all proposed residential allocations are supported by a large

body of technical and viability evidence to demonstrate their deliverability and show that they can fund necessary supporting infrastructure.

### Gypsy and Traveller Provision

- 2.37 Several representors queried why the Plan needed to accommodate Gypsy and Traveller sites, although the Council has a statutory duty to carry out an assessment of the accommodation needs of Gypsies and Travellers under Part 3 of the Housing (Wales) Act 2014 and to meet any identified need for additional pitches under section 56 of the Mobile Homes (Wales) Act 2013. Another representor was in support of the Plan accommodating Gypsy and Traveller needs on the basis that 'everybody needs somewhere to live'.
- 2.38 In terms of the Court Colman (SP7(1)) proposal, concerns were raised regarding the impact this development may have on the ward and immediate area, particularly in a rural area of natural beauty, which is considered to have high ecological value. However, the proposed allocation has been subject to a SA along with Policy COM8, which provides associated development management criteria, and is considered to provide adequate policy level mitigation in this respect. Representors also requested that the Council consider an alternative site outside of the ward, although a search sequence has already been conducted and is documented in the Gypsy and Traveller Site Options Background Paper. Conversely, one representor felt that the Gypsy and Traveller allocation is suited to this location on the basis that there are less homes surrounding the immediate site and any development will not directly impact residents.
- 2.39 In terms of the Bryncethin (SP7(2)) proposal, several residents stated that the development would be 'unwelcome' and not of any benefit to the local area. A range of reasons were provided in objection to the allocation, including: the area is already busy enough without more residents, crime rates may increase, anti-social behaviour may increase, properties may be de-valued, the area may be stigmatised, dogs could attack nearby livestock, animals could be abused at the site, the occupants may not be in employment, the elderly could be made to feel vulnerable, and people may want to move away. However, these issues are not planning matters. Other representors stated that the proposal would result in a loss of recreation space, as the site was once earmarked for sports fields. However, the recent planning application (P/21/494/FUL) for provision of 3 rugby fields is to the east of and divorced from the site in question. Other objectors referenced the lack of sewerage connections, potential impacts on highway safety and the lack of a suitable access. However, the Council has maintained ongoing dialogue with Welsh Water regarding sewerage provision and COM8 requires proposals for new or extended sites to be supported by necessary physical, transport and social infrastructure to ensure they do not have an adverse impact on the transport network.

- 2.40 When the Gypsy and Traveller Accommodation Assessment (GTAA) was completed, the total estimated pitch provision was for 7 pitches up until 2033. Since then, one family has met their accommodation needs, leaving a remaining need for six pitches over the Plan period. This need stems from two families (i.e., three pitches per family). One of these families has recently received planning consent to intensify their existing site and meet their accommodation needs (planning application P/21/677/FUL refers). This leaves a remaining need for 3 pitches, which the Council considers can be appropriately accommodated by the original proposed allocation at Court Colman (SP7(1)), which is already in the family's ownership. As such, the other proposed allocation at Bryncethin (SP7(2)) is no longer considered necessary and will be removed from the Replacement LDP.
- 2.41 Welsh Government also commented that, to ensure compliance with legislation and planning policy, the GTAA should be formally agreed by the relevant Welsh Government Minister prior to the examination. In addition, the Council will need to demonstrate at the examination that the sites can be delivered in the identified timescales. The Council submitted the GTAA to Welsh Government in December 2020, has liaised with Welsh Government on this matter and remain committed to progressing the GTAA to formal approval in the near future. The Council has also liaised with the respective family to ensure the SP7(1) allocation is deliverable.

## **6. Do you have any comments to make on the employment strategy?**

- 2.42 Several representors cited broad support for the overall employment strategy, stating that it expounds the Plan's contribution to sustainable economic growth by detailing how the employment requirement will be met over the plan period. These comments are noted.

### Out-Commuting

- 2.43 A few representors cited concerns that the number of homes proposed in the County Borough would transform the character of the area, no jobs would accompany the growth and the locality would effectively become a commuter belt for Cardiff and Swansea. On this basis, it was argued that the County Borough should not accommodate any further growth as adding more housing would 'take the town feel out of the area'. In response, the Replacement LDP evidence base has evaluated a comprehensive range of growth options and analysed the link between different levels of population change and the size and profile of the resultant resident labour force. This has ensured development of a Growth Strategy that is most appropriate to achieve an equilibrium between the number of economically active people remaining within and moving into the

County Borough plus the number of employers relocating and/or expanding within the same vicinity. A key aim of the Plan is to minimise the need for out-commuting. Therefore, the Replacement LDP does not seek to transform Bridgend County Borough into a commuter area for Cardiff and Swansea; this is the opposite aim of what the strategy is seeking to achieve. The level of growth proposed is considered the most appropriate to achieve an equilibrium between new homes and employment provision, balanced against other key infrastructure requirements, and connected through enhanced active travel opportunities. This is detailed further within the Employment Background Paper.

### Repurposing of Employment Sites

- 2.44 Some representors referenced recent trends and suggested that Policies ENT2 and ENT3 should maximise flexibility for the repurposing of employment sites, allowing development to respond to market conditions and market signals if necessary. It was argued that restricting development on employment sites to B Use Classes only 'may be counterproductive in making the most efficient use of land and driving economic prosperity'. Instead, it was claimed that greater flexibility could be achieved by including other employment generating uses, including non-B-class uses.
- 2.45 The Council is aware that there is significant pressure for certain uses of this nature on employment sites, notably those falling within Class D2, such as cinemas, children's soft play centres, indoor/outdoor activity centres and fitness/sports centres, which by their very nature, require a large space, often with significant headroom. In order to maintain a sustainable level of employment land, and based upon the recommendations of the EEBS, the Council will protect the sites detailed in ENT2 for employment purposes. The safeguarding of existing sites and premises, where appropriate and necessary, will help to meet the employment needs of the local and wider economy by providing accessible sources of employment (refer to the Employment Background Paper). The intensification and refurbishment of sites and premises identified within ENT2 will also be acceptable in principle, subject to proposals satisfying other policies in the Plan.
- 2.46 ENT3 outlines criteria to determine applications for non-B uses on such sites. However, to deliver the 'Town Centre First' approach outlined within PPW and Future Wales, the Replacement LDP seeks to direct facilities and services to town centres in the first instance. Therefore, before any non-B uses are permitted on allocated employment sites, applicants must demonstrate that other sites within town centres, and the sequential hierarchy detailed in SP12, have been investigated and found to be unsuitable. Proposals for non-B uses will also need to demonstrate that either the existing use is inappropriate or that the land or

premises is surplus to the requirements of the employment market. As such, the Plan is considered flexible enough to respond to the market accordingly.

#### Ty Draw Farm, North Cornelly

- 2.47 Arguments were also put forward to de-allocate Ty Draw Farm, North Cornelly ENT1(11) as an employment site and either re-allocate it as a residential site or re-designate it as 'white land' within the settlement boundary. Representors argued that the site is undeliverable as an employment allocation because it has been unsuccessfully marketed for this use and not taken up despite being allocated for employment for 'over 40 years'. However, the remaining employment portion (2.23ha) of the site is now considered to be materially different proposition to the entire greenfield site (6.1ha) that had been marketed unsuccessfully for development over the period mentioned. The site was re-allocated from a 100% employment site to a Regeneration and Mixed-Use Development Scheme within the existing adopted LDP (2006-2021). Planning consent for a 'hybrid' scheme was granted in 2014, including full consent for residential use to the south of the site and outline consent for employment use to the north. An access off the main estate road was also required to be provided to enable the employment development to be completed.
- 2.48 The residential element of the site was complete by the end of 2016/17, although the site owner did not submit a re-profiling scheme for the employment part of the site within the time limits specified by the Section 106 agreement. As such, while the representor has cited extensive marketing of the remaining 2.23ha, the Council's view is that the site has yet to be marketed to its full potential as more modest, yet accessible, serviced employment opportunity. It is therefore considered that the findings of the Economic Evidence Base Study (EEBS, 2019) and Update (2021) are still entirely relevant, and it is reasonable to give the site more time to come forward before concluding that it should be released as an employment allocation. Refer also to the Employment Background Paper.

#### Brackla Industrial Estate

- 2.49 Proposals were also put forward for the Replacement LDP to consider a more flexible mix of uses at Brackla Industrial Estate. However, the site was identified in the EEBS as a site that would contribute to future employment land supply, hence the site is allocated within ENT1 for new employment land development of B1, B2 and B8 use classes. Whilst the comments are noted, any alternative proposal would need to clearly justify the loss of employment land in accordance with the LDP policy framework.

### Former Ford Site, Bridgend

- 2.50 A representation was also submitted advocating flexibility regarding land uses at the former Ford Site, Bridgend. However, ENT5 already recognises a unique approach is required to enable redevelopment of the site and it will be necessary to enable a flexible mix of economic uses, not necessarily akin to the type and density of uses previously accommodated on the site. The policy is therefore considered appropriate and the Council will work collaboratively with Welsh Government and the landowners to secure the best outcome for Bridgend.

### Porthcawl Employment

- 2.51 Several members of the public raised concerns about the employment strategy for Porthcawl, specifically that the residential development will not be accompanied with any new jobs. However, the Replacement LDP recognises that Porthcawl has an important role in the settlement hierarchy of the County Borough, given that it is a principal centre of services, jobs and community facilities (refer to the Settlement Assessment). The Plan (see Table 6) acknowledges the imbalance between housing and employment at Porthcawl due to a lack of 'B space' employment land. However, the Replacement LDP seeks to reinforce employment in the town through planned growth in the commercial, leisure and tourism sectors. The development will help boost the local economy of this existing Main Settlement by increasing the pool of local labour and rendering the centre more attractive for development by closely linking new residential development to employment, recreation and education uses through active travel principles. This is designed to combat potential decline in the town, which may otherwise occur without a lack of economic growth over the plan period.

## **7. Do you have any comments to make on retail centres and development policies?**

### 'Town Centre First'

- 2.52 Several comments were made in support of the Plan's 'Town Centre First' approach and general principle of regenerating town centres. Many representors were concerned about the decline of the high street and emphasised the importance of 'improving the town centre offer', stimulating town centre footfall and 'reimagining' the town centre experience. Support was also cited for the retail hierarchy and identification of key/main settlements.
- 2.53 A further representation was submitted in relation to the Bridgend Shopping Centre, which referenced that a large part of the centre is within the proposed Primary Shopping Area. It was stressed that the Replacement LDP should provide sufficient flexibility to ensure the centre remains successful, without tempering its ability to attract new uses and maintain a low vacancy rate.

2.54 As recognised in the Retail Background Paper and Covid-19 Policy Review Background Paper, high streets will continue to change, especially in the short-term, due to the increase in online shopping associated with the pandemic. The Replacement LDP already acknowledges that town centres need to diversify if they are to retain their vitality and viability. The range and variety of shops and services has changed over time and will continue to evolve. However, there is a need to ensure that commercial centres do not lose their ‘critical mass’ of retail units to the extent that they can no longer function as viable shopping centres. Accordingly, there is a need to strike a balance between retailing and non-retailing uses in commercial centres to ensure the optimum mix, and thus enhance the vitality and viability of those centres. Policy ENT7 recognises that the Primary Shopping Areas of the County Borough’s town centres need protection from competing uses. Primary shopping frontages can complement ongoing public realm pedestrianisation and town centre regeneration objectives, which seek to increase the retail offer of the centres in a pleasant, attractive environment. As such, the policy framework is already considered flexible enough in this respect.

#### Retail Floorspace

2.55 One representor sought allocation of significant (2,900m<sup>2</sup> net) out of town retail floorspace at Parc Afon Ewenni, although this proposal is not supported. The level of space proposed is above this threshold set in PPW, not based on any identified need and not supported by a retail impact assessment. Therefore, the representor’s proposal is not supported and would be of detriment to the Town Centre First principle enshrined in national policy and promoted by the Replacement LDP Strategy.

2.56 Another representor sought specific retail floorspace allocations on strategic sites. However, this is not considered necessary and the position is outlined within the Retail Background Paper, informed by the Retail Study (2019) and Retail Study Update (2022). The retail need identified will be met by allocating regeneration sites in or adjacent to Bridgend and Porthcawl Town Centres, the re-use and regeneration of vacant units within commercial centres and via local service centres on new strategic sites. This will be complemented by policies in the Replacement LDP which clearly highlight the circumstances where new retail developments will be acceptable outside the centres in the hierarchy. i.e. where they can demonstrate they will complement existing facilities and can be accessed by sustainable forms of transport.

#### Porthcawl Food Store

2.57 Numerous representors submitted comments in opposition of the proposed food store at Porthcawl Waterfront, primarily due to its prominent location on the seafront, commenting that it will have a negative visual impact on the gateway into Porthcawl. Conversely, several representors were in support of the proposed

food store on the basis that it will provide ‘a little employment’ and attract more people into the town with the accompanying travel links.

- 2.58 As outlined within the Retail Study (2019), Porthcawl Town Centre has a limited convenience offer, which is significantly below the UK average. The food store site forms a key element of the wider masterplan that has been developed for Porthcawl Waterfront. A robust tender process was utilised to enable development of the food store, whereby each bid was carefully assessed against a planning development brief. The brief required bidders to submit high-quality, bespoke designs for premises that could act as ‘gateway buildings’ as well as incorporating appropriate access and active travel arrangements. Planning consent has since been issued for this development (Ref:P/21/835/FUL).
- 2.59 The food store is intended to act as a precursor to, and catalyst for, future phases of development across the wider site. As well as providing residents with greater choice and more flexibility, the development is intended to unlock funds that will be reinvested into local infrastructure improvements within Porthcawl and further stages of the regeneration plans.

## **8. Do you have any comments to make on the renewable energy, mineral resources and waste management policies?**

### Minerals

- 2.60 Welsh Government highlighted the need for an agreed Statement of Sub-Regional Collaboration regarding the production of crushed rock or sand and gravel and the Council will seek to resolve this issue prior to examination.
- 2.61 In addition, Welsh Government recommended that a list should be included in Policy ENT14 to clearly identify the location of the mineral operations and their buffer zones. A corresponding list will be added within Policy ENT14 in the submission version of the Plan.

### Renewable Energy

- 2.62 One representor argued for greater reference to Future Wales’ Pre-Assessed Areas (PAA), whilst highlighting that Councils should take the PAAs directly into their new development plans without amendment. In response, enhanced references will be made within the Local Issues and Drivers (LS3), although further changes are not considered necessary as the Replacement LDP will identify the PAAs and does not seek to make any amendments to the PAAs identified.
- 2.63 Some representors cited concerns regarding the financial constraints of renewable energy requirements. However, no changes are considered necessary to the policy framework in this respect. The Council has an aspiration for all new homes to be net zero carbon. Policy ENT10 will ensure that new major development is accompanied by an ‘Energy Masterplan that demonstrates that

the most sustainable heating and cooling systems have been selected. Any proposed development will be required demonstrate how the proposal will facilitate a connection to a low carbon heat network, or robustly justify why the connection is not technically and/or economically viable and suggest an alternative approach.

- 2.64 Other representors proposed setting a higher dwelling threshold for an energy masterplan within Policy ENT10 and ENT11. However, these proposals are also not supported. The requirement for new major development to be accompanied by an Energy Masterplan follows the advice contained within PPW (Edition 11).

## **9. Do you have any comments to make on the natural and built environment policies?**

### Natural and Built Environment

- 2.65 Numerous representors cited concerns about the negative effects of development and perceived urbanisation of the County Borough. Arguments were put forward to suggest that development of certain sites would have a detrimental effect on local wildlife, habitats, biodiversity, natural resources, air quality, green spaces and the general rurality of certain areas. However, the Replacement LDP acknowledges that the County Borough has a rich and varied biodiversity with a broad range of species, habitats and unique landscapes. Policies have been refreshed and updated from the existing LDP and will continue to protect the County Borough's environment in line with national planning policy and the Environment Act 2016. Development proposals including strategic site allocations will be expected to maintain, protect and enhance Bridgend's green infrastructure network and ensure that individual green assets are retained and integrated wherever possible.
- 2.66 Similar concerns were also raised in relation to the potential impacts' development may have on historic buildings, local heritage, archaeological remains and other historic assets. However, the Replacement LDP recognises the importance of the historic environment and its fundamental role in distinctive and natural placemaking. The impact of any development proposal will be required to be fully considered by applicants through the preparation of a heritage impact assessment and statement (refer to SP18).
- 2.67 The Deposit Plan SA Report demonstrates how the SA, incorporating SEA, process has informed the development of the Deposit Plan, including the incorporation of recommended changes within the document. As a result, the SA Report concludes that there is good coverage of all key sustainability issues in Deposit Plan, with plan components performing well against the SA Framework. It also identifies strong compatibility between the LDP Vision/Objectives and the SA Framework, plus no likely significant adverse effects (taking account of mitigation in all its forms).

- 2.68 In accordance with statutory requirements, PPW sets out multiple requirements for development to avoid direct adverse effects on nationally important heritage assets and for the need for any development resulting in adverse effects on the historic environment to be robustly justified.

## **10. Key proposals for Maesteg and the Llynfi Valley**

- 2.69 Several representors were supportive of the approach to allocating Long-Term Regeneration Sites in the Maesteg and Llynfi Valley, whereas others shared concerns regarding market demand and deliverability. However, the retention of such sites represents a necessary degree of continuity with the first adopted LDP. The Replacement LDP recognises that will require longer lead-in times, preparatory remediation-based enabling works and/or more detailed strategic master plans before they can come forward. The Council remains committed to delivering these sites, although, in accordance with national policy, the Plan's housing trajectory will not be dependent on their delivery. Refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper, Candidate Site Assessment and Minimising the Loss of the BMV Agricultural Land Background Paper.
- 2.70 Several other representations were submitted in support of the three sites proposed for allocation at Pont Rhyd-y-Cyff (COM1(3-5)). The representors confirmed that the sites are considered deliverable in the short-term and are anticipated to come forward within the early stages of the Replacement LDP period. These comments are duly noted.

## **11. Key proposals for Porthcawl, Pyle, North Cornelly and Kenfig Hill**

### Land East of Pyle (SP2(5))

- 2.71 Some representors raised concerns about the deliverability of Land East of Pyle due to the involvement of several landowners, viability considerations and the lack of significant recent housing delivery in Pyle. However, a detailed plethora of evidence has been provided to the Council to support its delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106 requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality development.
- 2.72 Other representors argued that Land East of Pyle should be re-considered for allocation within the forthcoming Strategic Development Plan (SDP) due to its scale. Nevertheless, work on the SDP has not yet commenced and site thresholds have not yet been defined through this process. The Bridgend Replacement LDP is being prepared in advance of the forthcoming SDP and the site promoter has clearly demonstrated that Land East of Pyle is both viable

and deliverable during the Replacement LDP period, in accordance with the Growth and Spatial Strategy. In terms of cross boundary implications, Neath Port Talbot County Borough Council has submitted formal representations on the Bridgend Deposit Plan and cite no objections to this proposed allocation and support the Replacement LDP.

#### Porthcawl Waterfront SP2(1)

- 2.73 Several representors raised concerns about the deliverability of Porthcawl Waterfront, with some proposing its re-allocation as a Long-Term Regeneration Site and others recommending postponement to the site's housing trajectory. However, these proposals are not supported. Porthcawl Waterfront was subject to robust re-assessment of its sustainability, deliverability and viability credentials in the same manner as all other candidate sites. There has been a substantial change in circumstances to demonstrate this site can be delivered over the Replacement LDP period, as indicated within the housing trajectory (refer to the Housing Trajectory Background Paper, Spatial Strategy Options Background Paper and Candidate Site Assessment).
- 2.74 Numerous members of the public opposed the re-allocation of Porthcawl Waterfront for a range of reasons, including potential negative impacts on wellbeing, infrastructure, the street scene, the seascape/landscape, the environment, flooding, traffic, parking provision, tourism provision, leisure provision and job creation. However, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (refer to PLA1). The provision of new residential units, including affordable dwellings, will enable the delivery of other vital regeneration requirements comprising public open space, leisure, enhanced active travel links plus education, retail and community facility provision. The Replacement LDP is also accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive components of the Plan, with appropriate mitigation measures incorporated. A Placemaking Strategy has been developed and produced, which provides the framework to deliver the broader vision for Porthcawl. This aims to create a premier seaside resort of regional significance through the comprehensive regeneration of this key waterfront site. It proposes a sustainable distribution and variety of complementary land uses across the area. Physical development of the waterfront in this manner will improve the attractiveness of the town as a place to live and work, enhance the vibrancy of the Town Centre and deliver wider socio-economic benefits that allow the broader settlement of Porthcawl to thrive and prosper.

## **12. Key proposals for the Ogmore and Garw valleys**

- 2.75 Some concerns were raised regarding lack of investment in the Ogmore and Garw Valleys. However, these localities are identified as Local Settlements.

Therefore, whilst these areas will not be earmarked to accommodate significant growth, the Replacement LDP seeks to create sustainable communities linked to wider opportunities in a manner that protects their high-quality environment. It is recognised that alternative forms of development would help deliver smaller-scale growth, such as (but not limited to) co-operative housing, self-build and custom build opportunities alongside other forms of development. Such community investment opportunities will enable development of a scale and nature that is tailored to community needs, whilst diversifying and strengthening the local economies, connecting communities to wider opportunities and protecting the high-quality environments.

### **13. Key proposals for Bridgend and Pencoed**

#### Parc Afon Ewenni, Bridgend COM1(1)

- 2.76 Several representors raised concerns about the deliverability of Parc Afon Ewenni, Bridgend, with some proposing its re-allocation as a Long-Term Regeneration Site and others recommending postponement to the site's housing trajectory. Parc Afon Ewenni was subject to robust re-assessment of its sustainability, deliverability and viability credentials in the same manner as all other candidate sites and was considered deliverable at Deposit Stage. However, the draft revised Technical Advice Note 15, supported by the new Flood Map for Planning, has revealed substantial flood risk issues across the Parc Afon Ewenni site. While the Flood Map for Planning has no official status for planning purposes until June 2023, additional site-specific modelling work has failed to demonstrate that this constraint can be overcome in the short term. As such, Parc Afon Ewenni can no longer be relied on to contribute to delivery of the housing requirement and has been removed from the housing trajectory.

#### Land South of Bridgend (Island Farm) SP2(2) and Craig y Parcau COM1(2)

- 2.77 Numerous representors opposed the allocation of Land South of Bridgend (Island Farm) and Craig y Parcau, Bridgend for a range of reasons. These included potential pressure on infrastructure, air quality concerns, highway safety concerns, loss of landscape and potential detriment to visual amenity, history, archaeology, woodland and biodiversity.
- 2.78 The rationale for allocation of these sites is detailed in the Candidate Site Assessment. Craig y Parcau is located on the periphery of Bridgend Sustainable Growth Area. The site is well serviced by the Active Travel network which will help foster and promote transit-oriented development. The site is considered to be free of any significant constraints and is considered appropriate for residential allocation. Equally, Land South of Bridgend (Island Farm) is located on the periphery on Bridgend Sustainable Growth Area, has the potential to provide a new primary school and accommodate the relocation

of Heronsbridge Special Educational Needs School in addition to providing 788 homes. The site could also provide significant new green infrastructure (including ecological mitigation) by fostering a multi-functional green lung between the site and Bridgend in addition to access improvements. In addition, the site is well serviced by active travel routes of which will help foster and promote transit-oriented development.

- 2.79 Proposed Policy PLA2 prescribes a number of placemaking principles for Land South of Bridgend (Island Farm), which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. A final masterplan must be prepared and agreed with the Council prior to the sites development to demonstrate how these principles will be delivered in an appropriately phased manner. This will need to demonstrate how the development will create a well-connected, sustainable mixed-use urban extension to Bridgend, comprising a number of character areas that integrate positively with the existing landscape, SINC, adjacent Grade II\* listed Merthyr Mawr House, existing housing clusters, community facilities, Active Travel Networks and public transport facilities. The provision of new residential units, including affordable dwellings, will be incorporated alongside a new primary school with co-located nursery, the re-location of Heronsbridge Special School, leisure facilities, recreation facilities, public open space, plus appropriate community facilities, employment and commercial uses.
- 2.80 The Replacement LDP is also accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive component within the Plan (strategy, policies, site allocations, etc.) and any identified reasonable alternatives. For Land South of Bridgend (Island Farm), the SA identified the potential for adverse impacts due to the proximity of the site to scheduled monuments and listed buildings. However, the requirements under SP2 (for each strategic site allocation to be supported by a detailed masterplan) and PLA2 (for the proposed strategic site allocation to implement specific masterplan development principles) represent forms of mitigation to help address the identified likely significant effects.

#### Merthyr Mawr

- 2.81 Correspondingly, many representors were opposed to development near Merthyr Mawr and proposed that the Replacement LDP should seek to protect the area. However, the land surrounding Merthyr Mawr is recognised within the Replacement LDP and is very much protected by various designations and policies (see Appendix 25 – Special Landscape Designations and Appendix 26 – Landscape Character Assessment). As highlighted by Policy SP17, the historic landscape of Merthyr Mawr Warren is a National Nature Reserve. These are protected under the Wildlife and Countryside Act 1981, as amended by the Countryside and Rights of Way (CROW) Act 2000, the Natural Environment

and Rural Communities (NERC) Act 2006 and the Environment (Wales) Act 2016. Policy SP17 specifically seeks to protect statutorily designated sites of national importance and any development proposal which affects such sites will be subject to special scrutiny to establish any potential or indirect effects.

2.82 Merthyr Mawr Warren is also designated as a Special Landscape Area, in recognition of the surrounding character and quality of the landscape. Policy DNP4 protects such designations from inappropriate development.

2.83 Merthyr Mawr Village is also designated as a Conservation Area in recognition of the area's special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance. In considering development proposals, the Council will seek to resist new development or the demolition of existing buildings unless it would preserve or enhance the character and appearance of the conservation area (refer to Policy DNP11).

#### Land West of Bridgend SP2(3)

2.84 Several other representors also opposed the allocation of Land West of Bridgend due to potential coalescence of communities, pressure on infrastructure, air quality concerns, highway safety concerns, potential loss of landscape and detriment to visual amenity, history, archaeology, woodland and biodiversity. However, the rationale for allocation of the site is detailed in the Candidate Site Assessment. Land West of Bridgend is located on the periphery of Bridgend Sustainable Growth Area. The site has the potential to provide a new primary school and residential growth in Bridgend, which possesses a wide range of services and facilities in addition to sustainable transport links. In addition, the site will also provide significant new green infrastructure in addition to capitalising on and further adding to existing active travel routes of which will foster and promote transit-oriented development.

2.85 As part of the proposed allocation of Land West of Bridgend, development will be subject to site-specific requirements including masterplan development principles and placemaking principles (refer to Policy PLA3). The provision of new residential dwellings, including affordable units, will be incorporated alongside a new primary school, recreation facilities, public open space, plus appropriate community facilities all set within distinct character areas. The Replacement LDP is also accompanied by a SA Report (incorporating SEA) to assess the likely sustainability and significant environmental effects of all substantive components of the Plan, with appropriate mitigation measures incorporated. For Land West of Bridgend, the SA identified the potential for adverse impacts due to the proximity of the site to scheduled monuments and important archaeological sites. However, the requirements under SP2 (for each strategic site allocation to be supported by a detailed masterplan) and PLA3 (for the proposed strategic site allocation to implement specific masterplan development principles) represent forms of mitigation to help address the

identified likely significant effects. These requirements also enhance the sustainability performance of the strategic site allocation more generally.

- 2.86 It is considered that the masterplan framework proposed for the site has been sensitively designed through a landscape and ecology-led approach. Appropriate mitigation measures have been incorporated to address concerns relation to landscape and visual matters. As such, the promotion of this site for residential development should be considered an acceptable extension to the existing settlement of Bryntirion, which would not cause significant or wide-ranging adverse effects upon its surrounding landscape context.
- 2.87 Proposed Policy PLA3 will require development to incorporate the Laleston Trail within the central part of the site, providing access to the Bridgend Circular Walk and realigned Public Right of Way. Additionally, PLA3 requires significant retained green infrastructure and new areas of public open space across the site. This will comprise of seven key areas of formal open space (including 0.5ha of equipped play provision), informal spaces and linkages, green streets, and sensitive public access to part of Laleston Meadows SINC and woodland.
- 2.88 Proposed Policy PLA3 also prescribes a number of placemaking principles for Land West of Bridgend, which are considered instrumental to achieving sustainable places, delivering socially inclusive developments and promoting cohesive communities. Such requirements include pursuing transit-orientated development that prioritises walking, cycling and public transport use, whilst reducing private motor vehicle dependency. Well-designed, safe walking and cycling routes must be incorporated throughout the site to foster community orientated, healthy walkable neighbourhoods. There will be a clear emphasis on providing safe pedestrian and cycling linkages along the A473, with Bryntirion Comprehensive School and Bridgend Town Centre (including the bus station and train station). PLA3 will also require development to provide a new shared cycle / footway on the northern side of the A473, connecting the site with active travel route INM-BR-57 linking to the shops at Bryntirion to the east, and a widened footway to the west of the site to provide a connection to the eastbound bus stop on the A473.

#### Land East of Pencoed SP2(4)

- 2.89 Some representors cited reservations about the number of units proposed at Land East of Pencoed, given site constraints, whilst also referencing deliverability concerns due to there being no developer on board, hitherto. However, as documented in the Candidate Site Assessment, the Land East of Pencoed site promoter has robustly demonstrated delivery in accordance with the requirements set out in the Development Plans Manual. A detailed plethora of evidence has been provided to the Council to support its delivery, including numerous site investigations and appraisals, masterplans, a viability assessment, a transport assessment and due consideration of s106

requirements, infrastructure and costs. This process has provided a high degree of confidence that the site is realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. Density analysing and proofing layouts have been prepared to evidence the number of dwellings deliverable on the site, taking all constraints into account. The related housing trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at several Stakeholder Group Meetings. As documented within the Housing Trajectory Background Paper, there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the latest Stakeholder Group Meeting. As such, the concerns raised regarding Land East of Pencoed are considered unsubstantiated and are not supported.

**14. Do you have any other comments to make on the Deposit Replacement LDP?**

- 2.90 Several representors commented that the overall document is long, complex and technical, thereby affecting its 'readability'. However, the Replacement LDP is, by its very nature, a comprehensive spatial planning strategy, underpinned by a wide-ranging evidence base. It must be prepared in the context of current national policy and legislation to ensure the plan is effective, deliverable and contributes to placemaking, as set out in PPW.
- 2.91 Several representors also submitted comments stating the consultation on the Deposit Plan was insufficient and too short. However, the Council went above and beyond legislative requirements in undertaking consultation on the Deposit Plan, in accordance with the Replacement Delivery Agreement and Community Involvement Scheme. When still in a period where Covid restrictions were continually evolving, there was need to make greater use of virtual meetings, social media, digital communication, web-based consultation tools, one to one telephone appointments, dissemination of hard copies to individuals and use of external agencies to assist with remote engagement. In addition, a longer consultation period (8 weeks, rather than the statutory 6-week period) was approved for these reasons. This range of consultation methods maximised public engagement and proved highly effective, evidenced by the number of representations received on the Deposit Plan (over 1,200).