

Appendix 2: Consultation Representations, Responses and Resultant Actions

Section 5: Do you have any comments on the proposed guidance for on-site provision of Outdoor Recreation Facilities outlined in Section 5?	
Organisation	Pencoed Town Council
Representation	With the recently proposed residential development to the East of Pencoed, which includes the construction of over 800 houses, I hope that this guidance takes such developments into account as the infrastructure and recreational facilities are already strained as things stand. For example, if there are 435 dwellings per 1,000 population, that would mean there would be over 2,000 people moving into the new residential development. Thus, is there room for 2.4 hectares of playing pitches, 3.2 hectares of other outdoor sports and so on? To me and the Council, it seems difficult to accommodate such demands.
Local Planning Authority Response	The SPG has been produced to provide supplementary guidance to adopted RLDP Policies, including the suite of allocations therein. This includes the strategic allocation at Land East of Pencoed. Land East of Pencoed will be subject to assessment against the full suite of adopted RLDP policies, notably the site-specific policy (PLA4) for this mixed-use strategic site. This policy states that 6 ha of Outdoor Recreation Facilities (ORFs) would be required on-site. This was based on a suite of evidence provided to inform development of the RLDP, including an illustrative masterplan, which is appended to the RLDP itself (Appendix 7) for purposes of visualisation. An outline planning application has recently been submitted for Land East of Pencoed and will be assessed against the RLDP. The precise nature of on-site recreation provision will be refined through the development management process. This draft SPG will only become a material consideration if adopted by Council, although will support RLDP policies rather than introducing new policy requirements.
Resultant Action	Comments noted and on-site recreation provision at Land East of Pencoed will be assessed against the suite of RLDP policies and refined through the development management process.

Section 5: Do you have any comments on the proposed guidance for off-site provision of Outdoor Recreation Facilities and commuted sums (financial contributions) outlined in Section 5?	
Organisation	Pencoed Town Council
Representation	No significant comments. However, off-site provision may be in high demand with the proposed residential development in Pencoed, as stated above.
Local Planning Authority Response	This SPG is intended to provide developers with guidance on the level and type of new ORFs typically required by Policy COM10 of the adopted RLDP. The SPG provides clarity and will help to enable the consistent application of the adopted policy, thus ensuring an appropriate level of ORFs is provided for all development sites.
Resultant Action	No action necessary.
Organisation	House Builders' Federation
Representation	The HBF supports paragraph 5.4 - 'However, subject to agreement with the local planning authority (LPA), it is acknowledged that there may be instances where the developer may transfer on-site ORFs to a private management company. The maintenance contributions shown in Column D of Table 1 would not be applicable in these instances.'
Local Planning Authority Response	The above comments are noted.
Resultant Action	No action necessary.
Section 5: Do you have any comments on the proposed development thresholds set out in Table 2, Section 5?	
Organisation	Pencoed Town Council
Representation	No issues with the table itself, but when applied to Pencoed and the proposed developments, it seems that every single site stated would have to be provided in the area to accommodate the over

	2,000 new residents should the developments go ahead. It is important that this is considered alongside the draft planning guidance for ORFs.
Local Planning Authority Response	It is recognised that the delivery of the full quantity of ORFs required by Table 2 in the SPG may not be feasible in all cases. The thresholds provided in Table 2 are intended as a guide as to what the LPA would typically expect to see delivered on a site of that scale. It should be noted that Land East of Pencoed has its own site-specific policy (PLA4 within the adopted RLDP) and the precise nature of provision will be refined through the development management process. Once adopted, the SPG will add clarity to policy application, however it will not alter the adopted RLDP policy requirements for this site or any other site.
Resultant Action	Comments noted and on-site recreation provision at Land East of Pencoed will be assessed against the suite of RLDP policies and refined through the development management process.
Section 7: Do you have any comments on the design guidance for new Outdoor Recreation Facilities?	
Organisation	Pencoed Town Council
Representation	No opposition to this, in fact it is supported. But again, it is worth being mindful of the capacity of Pencoed to provide such ORFs.
Local Planning Authority Response	<p>The above comments are noted.</p> <p>The site in question (Land East of Pencoed) will be assessed against adopted RLDP Policy PLA4, which lists site-specific requirements for the provision of on-site ORFs. However, the LPA recognises that, for all development sites allocated in the RLDP, there may be competing policy demands on development sites. In some cases, site-specific constraints may necessitate off-site provision. Where off-site contributions are proposed, applicants will be required to robustly demonstrate why on-site provision cannot be achieved. Where such justification is accepted, the LPA will refer to the most up-to-date Outdoor Sport and Children's Playing Space Audit and/or the Allotments and Community Gardens Audit to help determine which typologies should, where possible, be prioritised for on-site</p>

	delivery. Any agreed commuted sums will be managed by the LPA to support the maintenance and enhancement of ORFs to help meet community needs.
Resultant Action	No action necessary.
Organisation	Cwm Taf Morgannwg Public Health Team, Cwm Taf Morgannwg University Health Board
Representation	Thank you for inviting me to comment on the public consultation of this policy. I have read through and have only identified one comment I would like to make in section 7 you mention the secure by design guidance published by the police. Could you reference their guidance on using edible landscaping such as rosemary and fruiting trees to encourage security but also support access to good quality food in green spaces across Bridgend.
Local Planning Authority Response	<p>While the SPG contains a section setting out design <i>principles</i> for new ORFs, it does not seek to introduce very specific design requirements such as that mentioned. Instead, it lists a suite of externally accessed best practice guidance documents to enable applicants to achieve optimal design of new recreation spaces that take account of each site's individual context. Council approval will be sought to update links to the latest guidance post adoption to ensure that guidance remains current. Each development proposal will be duly assessed, with reference to Secured by Design Principles and other best practice as referred to in this SPG.</p> <p>Moreover, the need to safeguard and enhance biodiversity and integrated multi-functional green infrastructure networks is already a key part of the RLDP as detailed within Policy SP3. The strategic site policies (PLA1-5) also reference the need for allocated strategic sites to support opportunities for formal and informal play in addition to community-led food growing. There is already considered to be appropriate adopted policy coverage in these respects.</p>
Resultant Action	No action necessary.
Organisation	Play Wales

Representation	<p>Play Wales recommends that the SPG references the <i>Including Disabled Children in Play Provision</i> Position Statement, from the UK Play Safety Forum and Children's Play Policy Forum, which can be accessed here.</p> <p>You may also be interested in our Creating accessible play spaces toolkit.</p>
Local Planning Authority Response	<p>The LPA has considered the suggestion to include a reference to the <i>Including disabled children in play provision</i> Position Statement and is satisfied that it makes a positive contribution to the SPG. Section 7 (design guidance) of the SPG fully supports the needs of all members of the community in accessing and using ORFs.</p> <p>The SPG already includes a reference to the Play Wales' <i>Creating Accessible Play Spaces</i> toolkit within the SPG. The web-link will be updated.</p>
Resultant Action	<p>Insert a reference to the <i>Including disabled children in play provision</i> Position Statement under the <i>Local Community Needs and Accessibility</i> heading within Section 7.0 <i>Designing Outdoor Recreation Facilities</i> of the SPG.</p> <p>Update web-link to Play Wales' <i>Creating Accessible Play Spaces</i> toolkit under the <i>Design Guidance by Outdoor Recreation Facility Typology</i> heading within Section 7.0 <i>Designing Outdoor Recreation Facilities</i> of the SPG.</p>
Organisation	House Builders' Federation
Representation	The HBF supports paragraph 9.1 – 'The Council will adopt and maintain land as public open space within residential areas, where the primary function of that land is public open space.'
Local Planning Authority Response	The above comments are noted.

Resultant Action	No action necessary.
Appendices A & B: Do you have any comments on the Worked Examples?	
Organisation	Pencoed Town Council
Representation	It would be interesting to see the calculations of the required on and off site ORFs, the cost of the contribution and maintenance for 800 dwellings (over 2,000 residents). With just a cursory glance it seems that such costs would be considerably high.
Local Planning Authority Response	Costs and on-site provision requirements would be assessed in accordance with the guidance set out in Section 5.0 of the Outdoor Recreation Facilities SPG. This would be dependent on the nature of provision secured on a site-by-site basis. All on-site/off-site requirements contained within Table 2 are based upon the LPA's experience of historic planning applications. The costs set out in Table 2 are based on up-to-date evidence and reflect real-world examples of the costs of providing typical facilities. The figures were produced on behalf of Bridgend County Borough Council by Landscape Architects at Kirklees Council, who have extensive experience in the design and installation of ORFs. These costs are considered to provide a robust and realistic basis for planning purposes.
Resultant Action	No action necessary.
Do you have any other comments to make on the proposed Outdoor Recreation Facilities SPG?	
Organisation	Pencoed Town Council
Representation	I urge that such guidance takes into account the proposed residential developments to the East of Pencoed as such a development, along with the proposed ORFs calculations in this guidance, would have a significant impact on Pencoed and its infrastructure.
Local Planning Authority Response	Policy COM10, together with the Outdoor Recreation Facilities SPG, is intended to ensure that sufficient outdoor recreation provision is made to support the needs of a growing population. The LPA anticipates that this provision will be delivered either on-site or, where appropriate, within the vicinity of the development. As such, the proposed development is not expected to place additional

	<p>pressure on existing facilities in the town. Instead, new infrastructure will be provided to fully mitigate any potential impacts – subject to the adoption of the SPG prior to the submission of any reserved matters application.</p> <p>Land East of Pencoed will be subject to the requirements of the site-specific Policy PLA4 of the RLDP, which includes requirements for the provision of ORFs on-site. Table 2 contained within the SPG is indicative only and the precise level and type of provision will be refined through the development management process.</p>
Resultant Action	Comments noted and on-site recreation provision at Land East of Pencoed will be assessed against the suite of RLDP policies and refined through the development management process.
Organisation	House Builders' Federation
Representation	The HBF supports paragraph 3.1 (Background) - 'ORFs and spaces can also incorporate Sustainable Drainage Systems (SuDS), into their design which play an important role in reducing the impact of flooding.'
Local Planning Authority Response	The above comments are noted.
Resultant Action	No action necessary.

Proposed SPG Changes as a Result of the Consultation

The paragraphs proposed for amendment following the consultation are detailed below, for the reasons explained in the previous table. Strikethrough text is used to indicate proposed deletions from the SPG, whereas blue text is used to indicate proposed additions to the SPG. Only paragraphs proposed for amendment are included below, there are no proposed changes to the remainder of the draft SPG following consultation. The final draft version of the SPG (**Appendix 1**) incorporates the proposed amendments below.

- Insert a reference to the *Including Disabled Children in Play Provision* Position Statement by the Play Safety Forum under the *Local Community Needs and Accessibility* heading within Section 7.0 *Designing Outdoor Recreation Facilities* of the SPG:

7.8 ORFs should be designed to reflect the needs of local communities at different life stages in order to maximise community benefit. Dialogue should be initiated with the community early in the development process, supplemented by use of local health indicators and population profiles to inform the design of ORFs. ORFs should also be designed to promote gender equality and be safe and accessible for all users. Spaces should be appropriately designed to cater for the needs of children with additional learning needs and disabilities. [Particular regard should be given to the *Including Disabled Children in Play Provision Position Statement* by the Play Safety Forum and UK Children's Play Policy Forum when designing new play facilities.](#)

- Update web-link to Play Wales' *Creating Accessible Play Spaces* toolkit under the *Design Guidance by Outdoor Recreation Facility Typology* heading within Section 7.0 *Designing Outdoor Recreation Facilities* of the SPG:

7.12.2 Children's Play Areas (Equipped/Designated Play Areas):

- Play Wales – [Creating Accessible Play Spaces: A Toolkit](#)