

Bridgend Local Development Plan

2006-2021



Bridgend Local Development Plan

Examination

<http://www.bridgend.gov.uk/ldpexamination>

Tuesday 20 November 2012 10:00am

Session 1 – Strategy

Inspector's Agenda with Matters and Issues

1. CHAPTER 1 - INTRODUCTION AND BACKGROUND

- 1.1 Several Representors raise issues concerning Chapter 1 or more general matters that relate to the Plan as a whole. *[The figures in brackets identify a related representor and representation number].*

Qn1a. Is it implicit that the Plan is to be read as a whole or should there be either a statement to that effect or further cross-referencing in the interests of coherence? (54.1; 54.17; 54.40; 54.85)

The Council relies on the response detailed in Consultation Report Volume 2: Appendix I (SD08):

"It is intrinsic that the LDP in its totality will be used by the Council to guide and manage development, providing a basis for consistent development. As part of the Plan-led system, the Planning and Compulsory Purchase Act 2004 requires that the determination of planning applications for development must be in accordance with the Development Plan unless material considerations indicate otherwise. It is therefore implicit, within what a development plan is and its purpose in accordance with the Act that regard should be made to the whole Plan, including all relevant Policies in the context of a development. The statement is therefore superfluous."

Qn1b. Should the Plan be seeking at 1.1.2 to 'build upon and add value' to the national Wales Spatial Plan? (54.2)

The Council relies on the response detailed in Consultation Report Volume 2: Appendix I (SD08):

"Welsh Government Guidance, specifically in the Local Development Plan (LDP) Manual, states that Policy integration is essential if LDPs are to build on and add value to other plans and strategies, which includes the Wales Spatial Plan."

Qn1c. Having regard to coherence, is it appropriate in LS1 to describe recognised international, national and regional environmental features as key local needs and issues? (54.3)

The Council accepts that the international, national and regional environmental features could also be included under the Key National and Regional Needs and Issues. However given their very site specific nature which needs expression on a local level, it was concluded through the pre-deposit consultation that they should be included under the Key Local Needs and Issues.

- 1.2 The Welsh Government considers that the Welsh Language should form part of the overall assessment when preparing the plan, ensuring that the principle of development is not decanted to the planning application stage. They seek clarification that in this instance the matter has not been overlooked (64.18). National policy on this matter is set out in Technical Advice Note TAN20.
- 1.3 The Council concluded, based on in Background Paper 1 (SD35), that the plan's major development proposals will not affect linguistic balance and any language issues can be appropriately addressed at the development management stage.

Qn1d. Should the Welsh Language be addressed directly in the Plan?

The Council relies on the response detailed in Consultation Report Volume 2: Appendix I (SD08) which concluded that given the relatively low levels of Welsh language use across the County Borough, it is not considered that major development proposals will materially affect the linguistic balance of the area, to the detriment of Welsh language use. It is therefore considered that this issue will not be addressed by specific policies in the LDP. However, under the provisions of TAN20, the Welsh language will remain a material consideration in the development management decision making process.

Notwithstanding the requirements of TAN20, Iaith Pawb, A National Action Plan for a Bilingual Wales (WD17) states that in communities where Welsh is spoken by over 70% of the local population, such a density of Welsh speakers means that the language is more likely to be spoken in social, leisure and business activities. It is within these areas that Welsh is a living, everyday language and is part of 'the fabric of the community' and where potential development could affect the linguistic balance of an area. The equivalent Welsh speaking percentage in Bridgend County Borough is 10.8%, and no area exceeds 13.6% when considered at the Middle Super Output Area level.

2. CHAPTERS 2 & 3 - THE PLAN STRATEGY/PRODUCING HIGH QUALITY SUSTAINABLE PLACES

Objectives

- 2.1 The Countryside Council for Wales (CCW) seeks a number of modifications to the objectives.

Qn2a. As Objective 1 generally seeks to produce 'high quality sustainable places' is it necessary to also modify Objective 1c to repeat the word 'sustainable' specifically in relation to the regeneration of the Porthcawl Waterfront and having regard to its proximity to sites of conservation importance? (54.6)

Given that Strategic Objective 1 is overarching and includes reference to sustainability the Council considers the inclusion of the word 'sustainable' in Objective 1c is superfluous.

Qn2b. Should paragraph 2.3.31 further define the status of protected sites near Porthcawl and their legal status or is that suitably addressed elsewhere in the Plan? (54.14)

The Council relies on the response detailed in Consultation Report Volume 2: Appendix I (SD08).

"Paragraph 2.3.31 of the plan provides a general description of the area and strategy. Chapter 3 Protecting and Enhancing the Environment clearly identifies the different status of the various protected sites in the area, and the legal protection afforded to them which the plan's strategy is seeking to protect."

Qn2c. Does Objective 2e also need to repeat national policy in Planning Policy Wales aimed at reducing energy demand and improving energy efficiency? (54.9)

The Council contends that the Objectives should not merely repeat Planning Policy Wales and have been developed through the pre-deposit consultation. The current wording of Objective 2e of "contributing to the energy needs of Wales" not only encompasses reducing energy demand and improving energy efficiency but includes the use of renewable and low carbon energy. This is then expanded upon in Section 4.6 of the LDP.

Qn2d. In Objective 3f, what does 'realistic' mean when describing town and district centres and is use of the term coherent? (54.11)

The term 'realistic' derived through the pre-deposit consultation and referred to the need to review the commercial centre boundaries as detailed in SD41. This involved reviewing all town and district centres in terms of their vitality and viability based on national and local planning policies which resulted in the expansion, reduction and consolidation or removal of boundaries where justified. In addition this allowed for the identification of previously unallocated clusters of retail provision and allowed the Council to establish boundaries to define and protect them where appropriate.

As the re-defining of the commercial centres was undertaken for inclusion in the Deposit LDP the Council accepts that the term 'realistic' is now superfluous. The Council propose the following MAC Change:

OBJ 3f: To support realistic and viable town and district centres in the County Borough which are attractive and economically successful.

Qn2e. Does the Sustainability Appraisal and other supporting information demonstrate that environmental considerations have suitably informed the regeneration strategy notwithstanding the omission of such a reference from the listed considerations at paragraph 2.3.11? (54.13)

The Council relies on the response detailed in Consultation Report Volume 2: Appendix I (SD08). However the Council would also further state that the main purpose of carrying out an SA is to assess what the impacts of development proposed in the LDP might be on the economy, environment and society. Where potential negative effects were identified the SA then makes recommendations for how the LDP can be modified, or controls put on development, to avoid or mitigate

against these. This was an integral part of the plan making process where successive stages of the emerging LDP are appraised and findings fed into the next stage of plan preparation.

The SA of the LDP and all of its stages of preparation, has also been prepared to meet the requirements of the Strategic Environmental Assessment (SEA) Regulations. These regulations require that plans, such as an LDP, need to be assessed to identify if they would have significant impacts on the environment and that realistic alternative strategy options have also been considered.

When considered in a comprehensive manner it can be seen that the Regeneration-Led Spatial Strategy has been developed to provide a land use framework, which will help realise the regeneration aspirations and priorities of the Council, and will make the most meaningful contribution with respect to securing social, environmental and economic benefits for the communities of the County Borough.

Employment and the Economy

2.2 The Employment Land Review 2010 concluded that the most prudent method of calculating need was on past completion rates of employment development which average only 6.33ha per annum. On that basis the Welsh Government estimates that the requirement during the plan period would be for only 94.95ha (or 76ha after allowing for completions between 2006 and 2009) (64.7). This may suggest a potential oversupply of employment land. The Council's response relies on Background Paper 9 Employment Land Supply (SD43).

Qn2f. In that context:

(i) Why do Policies REG1 and SP9 provide for as much as 153ha of employment land?

The Council's position on it's supply of employment land is contained within Background Paper 9: Employment Land Supply (SD43).

(ii) How much of that supply represents new allocations that are not already the subject of extant planning permissions?

The latest figures for the employment sites are as follows:

Areas of existing, established employment / industrial estate areas which contain 'pockets' of vacant land.

LDP Policy	Site Name	Total Area Remaining (Ha)	Area with Planning Permission
REG1(1)	Bridgend Industrial Estate	6.88	0
REG1(4)	Coychurch Yard Bridgend	0.3	0.2
REG1(26)	Crosby Yard Bridgend	0.85	0
REG1(5)	Litchard Industrial Estate	0.46	0
REG1(8)	Waterton Industrial Estate	11.29	3.94
REG1(12)	Heol Ty Gwyn Maesteg	3.14	0
REG1(16)	Abergarw Industrial Estate	2.99	0

REG1(18)	Brynmenyn Industrial Estate	7.41	0
REG1(23)	Bocam Park, Pencoed	1.16	0
REG1(24)	Bridgend Science Park	1	0
REG1(28)	Ffaldau Industrial Estate	0.07	0.07
REG1(30)	Georgia Pacific	2.1	0
REG1(34)	Penllwyngwent Ogmores Vale	4.23	0.21
REG1(37)	Village Farm Industrial Estate	5.15	0
	Total	47.03	4.42

Allocated new employment land in areas of identified growth; 'the SRGAs' and mixed use PLA3 sites

LDP Policy	Site Name	Total Area Remaining (Ha)	Area with Planning Permission	Draft or Adopted Development Brief?
REG1(1)	Brackla Industrial Estate	14	0	Yes (SD53)
REG1(6)	Parc Afon Ewenni	8 ³	0	Yes ³ (SD54)
REG1(9)	Coegnant Caerau	2	0	
REG1(10)	Ewenny Road Maesteg	3.5	0	
REG1(19)	Christie Tyler Site	2	2 ¹	
REG 1(21)	Land at west of Maesteg Road, Tondu	2 ²	0	
REG1(22)	Land adjacent to Sarn Park Services	3.8	0	
REG1(15)	Pwll y Waun	0.7	0	
REG1(29)	Gibbons Way, North Cornelly	0.03	0	
REG1(32)	Isfryn Industrial Estate	0.9	0.9 ⁵	
	Total	36.93	2.9	

Allocated Strategic Employment Sites which benefit the whole of the County Borough.

LDP Policy	Site Name	Total Area Remaining (Ha)	Area with Planning Permission	Draft or Adopted Development Brief?
SP10(1)	Brocastle Waterton	46.1	0	Yes (SD68)
SP10(2)	Island Farm Bridgend	11	6.56	
SP10(3)	Pencoed Technology Park	5.4 ⁴	0	
SP10(4)	Ty Draw Farm, Pyle	6.04	0	
	Total	68.54	6.56	

County Borough Total	152.5	13.88
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¹ Planning permission subject to s106

² Revised information from Representor 772 suggests a figure of 2.7ha

³ Draft Masterplan reduces employment land area to 2ha

⁴ Immediately available land

⁵ Planning permission subject to s106 – reduces the employment element to 0.4ha

The above tables demonstrate the amount of employment land with planning permission in the County Borough currently stands at 13.88ha. However, in addition, work has also been progressing on bringing forward sites for development. This includes infrastructure works and masterplanning of larger sites. The amount of land immediately available for development in the County Borough (although not benefiting from planning permission is approximately 40.9ha – Appendix 3 of the LDP refers).

(iii) Does that high level of employment provision have implications for the amount of housing provision given that the Cambridge Econometrics Report concluded that economic growth would be reduced and that fewer households would be created as a result?

The Council's position on the LDP's supply of employment land is contained within Background Paper 9: Employment Land Supply (SD43); in the context of this question paragraphs 2.4 to 2.7 are pertinent in explaining that the Council has not intrinsically linked the two issues in its approach to allocating employment sites and that by taking a wider, regeneration-led approach, it is providing sufficient land for economic development purposes to help address the significant economic and social deprivation issues facing the County Borough at the present time. This has included providing a wider portfolio of sites both in type and geographical extent to provide choice of opportunity across the County Borough.

(iv) If employment land provision substantially exceeds likely demand, would that risk substantial non-delivery and uncertainty in relation to the allocated sites including delivery of the mixed use sites and the regeneration-led spatial strategy? (54.69; 54.74)

The Council does not consider that its supply of employment land would risk non-delivery and uncertainty of sites. It is worth reiterating here that the Brocastle site, at 46.1ha, represents almost one third of the total employment land supply. It is considered that this site will be developed as a result of significant interest of the site from an inward investor/s in the area. To this end, whilst progress will be made through the LDP to ready the site for employment purposes by the laying of infrastructure and modelling of development plateaux (see SD68) part of the site may remain undeveloped for employment purposes by the end of the plan period. (Also see Background Paper 9, paragraphs 4.10 – 4.11)

In any event at 46.1Ha, this represents a 'gross' figure and the Council considers that it may be more preferable to reflect the 'developable' area of the site in the employment land supply figures. From the Masterplan, the Council estimate this to be approximately 20ha (See Appendix A).

Should this change (-26.1ha) , together with the reduction in employment land at Parc Afon Ewenni envisaged by the draft Masterplan (-6ha); the slight increase at Maesteg Road Tondu (+0.7ha) and the reduction at Isfryn Industrial Estate (-0.5ha), be taken into account; the vacant employment land at 2009 would be reduced to approximately 120.6ha.

In addition, in carrying out its review of employment sites for the LDP (SD117), the Council has taking an enabling approach to ensure that the delivery of employment

takes place. Former 100% employment sites are now allocated for mixed use, whereby the housing / commercial development of these sites can be used to facilitate their development, especially by providing readily developable land with the required infrastructure. This will, in fact, increase certainty around the delivery of these sites. Recent examples of where this approach has worked are the PLA3(11) Christie Tyler and PLA3(17) Blackmill sites where, through negotiation, the delivery of serviced employment land and serviced employment land plus employment units (respectively) are being secured. As can be seen from the tables above, continuing this approach could bring forward over 30ha of employment land over the plan period.

(v) Is the extent of provision 'realistic about resource availability' including for infrastructure and site restoration?

Appendix 3 of the LDP demonstrates that, of the 152.5ha of employment land remaining to be developed, approximately 40.9ha is immediately available for development. A further 7.35ha could be ready within 12 months for development. As outlined above the Council is working to bring forward those sites in the medium and long term categories, through negotiations on specific planning applications and the formulation of development briefs. The Council's regeneration department is also working to identify suitable funding sources, particularly through EU Convergence projects, to deliver site restorations and infrastructure works to deliver employment opportunities. A regional working group will shortly be established to identify sites which could be brought forward using this funding in the new post 2013 programme.

(vi) Would the extent of supply discourage speculative development for employment purposes?

The Council considers that, rather than discourage speculative development, the range and choice of sites provided by the Plan on a broad portfolio of sites in terms of type and geographic extent sends out a signal that Bridgend is "open for business" and can accommodate a variety of employment developments across the County Borough, whilst still concentrating employment development within the SRGAs and Strategic Employment Sites, thereby implementing the LDP Strategy.

(vii) Does providing land to meet 'as yet unidentified needs' justify the extent of proposed provision?

It is important for the Council to look to the future, beyond the Plan period if necessary, for its provision of employment land. Given the long term average build rates for employment land in the County Borough of 6.33ha per annum, the land bank in the deposit LDP would last up to 2033. Employment site provision, particularly the Strategic Employment Sites which will be largely demand driven, can have long lead in and development times.

Taking into account the requirements in PPW (paragraph 7.1.8) for Local Planning Authorities to be open and transparent in their approach to employment land provision, adopting a simple policy framework on a range and choice of sites, the Council considers that the common-sense approach which it has taken to its employment land review, assessments and allocations justify the extent of the provision proposed.

(viii) Has any consideration been given to the cumulative employment land supply including adjoining authorities?

The South East Wales Economic Forum (SEWEF) has recently undertaken studies on the supply and take up of employment land across the region (SD120). No policy forum currently exists for local authorities to take strategic policy decisions on employment land distribution across a region.

PPW does not currently require collaboration on this issue. However, the draft replacement chapter 7 of PPW published in late 2011 (WD43) will, if published in its final form, require development plans to reflect work with neighbouring authorities to plan strategically for employment land provision. This is also one of the recommendations of the recent review of the planning system undertaken on behalf of the Welsh Government. (WD79)

The Council, in anticipation of this, is currently working with its neighbouring authorities to develop a regional employment land database which will act as a starting point for consistent decision making across the region. It is likely that these strategic decisions on future employment land provision will be reflected in future revisions of the LDP. Notwithstanding this consideration it should be noted that the Travel to Work Area (See Appendix B) is very self contained, but expanding into the western part of the Vale of Glamorgan, justifying the need for Bridgend to provide for its own employment needs and beyond.

(ix) Is it necessary to protect all the allocated sites from other forms of development?

Taking into account the fact that all employment sites have been reviewed for alternatives uses prior to their allocation in the LDP, together with the fact that paragraph 7.2.7 of PPW requires that sites be reserved for employment uses, the Council considers that its starting point, as expressed in the first paragraph of Policy REG1 is correct. However, there is flexibility built into this by Policies REG2 and REG3 which allow non B1/B2 and B8 employment uses on REG1 allocated sites in certain circumstances.

(x) Some REG1 sites are proposed for B1 and B8 development. Why does REG2 protect 'industrial land and buildings' and not other forms of employment land?

The Council accepts that the term 'industrial land and buildings' is confusing when the intention was to refer to all land and buildings covered by Policy REG1. It would therefore propose to delete the word 'industrial' from both Policies REG2 and REG3.

Regeneration-led Development

- 2.3 Policy SP1 provides that development will be focused in the four Strategic Regeneration Growth Areas (SRGA). The policy and the accompanying text at paragraph 3.1.13 do not define what proportion of development may occur outside these areas. However Table 3.1 shows that 84% of housing allocations would be within the SRGA and therefore 16% would be elsewhere and the detailed locations are set out in Policies COM1 and COM2.

- 2.4 The allowance for windfall housing development is not divided between the SRGAs and other areas. However Policy COM3 limits such development to locations within defined settlement boundaries. There is no allowance for development outside development boundaries. Policy ENV1 does not allow for housing development in the countryside except for replacement dwellings.
- 2.5 Table 3.1 shows that most vacant employment land is in the SRGA areas. However the Table excludes the allocated Strategic Employment Sites from this analysis on the basis that they are expected to attract workers from a wider area within and beyond the authority's boundaries.

Qn2g. Housing need and supply will be considered at tomorrow's session. However if some Representors are correct in saying that additional housing allocations should be made to bring the housing supply figure closer to the 11,000 figure in the Welsh Government Household Projections plus a margin for non-delivery, is there scope to maintain a similar proportion of housing supply within the SRGAs such that the spatial strategy would be maintained?

The Council relies upon the evidence contained in Background Paper 2 (SD36) to justify the provision in Policy SP12 of 9000 new dwellings in the County Borough up to 2021. However, if additional housing is required closer to 11000 dwellings, the Council considers that there are opportunities in association with the SRGAs to increase housing supply without undermining the spatial strategy.

Qn2h. In the LDP, what is the proportion of allocated housing land on greenfield sites as opposed to brownfield (previously developed) land?

The following table details the proportion of housing land allocated under Policies COM1 & COM2 of the LDP that is proposed on greenfield sites as opposed to previously developed land. Full details of the of the greenfield and previously developed land split is detailed in Appendix C.

LDP Policy	Estimated Number of Units on Greenfield Land	Estimated Number of Units on Previously Developed Land	Total Estimated Number of Units
Policy COM1 – Residential Allocations in the Strategic Regeneration Growth Areas.	2391 (39%)	3769 (61%)	6160
Policy COM2 – Residential Allocations outside the Strategic Regeneration Growth Areas	567 (47%)	636 (53%)	1203
Total	2958 (40%)	4405 (60%)	7363 (100%)

From the above table and Appendix C it can be seen that 40% of the allocations under COM1 and COM2 are on greenfield sites. 39% of the dwellings located within the SRGAs are located on greenfield sites.

Qn2i. To increase the housing supply would it be preferable to:

- **use previously-developed employment land;**
- **use greenfield land that has already been allocated for new employment on mixed use or standalone sites; or**
- **release additional greenfield sites on the edge of urban areas?**

The Council would accept a combination of the above methods of increasing housing supply in principle if the Inspector concluded that the housing supply figure was too low and the employment land supply is deemed too high. The Council would refer the Inspector to paragraph 9.2.8 of PPW which specifically states that *“in identifying sites to be allocated for housing in development plans, local planning authorities should follow a search sequence, starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.”*

The Council agree that in the first instance it is preferable to use previously-developed or underutilised employment land, especially areas located on the PLA3 allocations. Given that the exact distribution, amount and type of each land use associated with the PLA3 allocations is flexible and under normal circumstances will be subject to more detailed negotiation at the development control stage, there is a 'built in' opportunity to reduce the requirement of employment land and increase the housing land associated with the allocation.

In respect of releasing additional greenfield sites on the edge of urban areas the Council would contend that this should be considered once the above options have been fully explored and limited in the first instance to land in association with one of the four SRGA's.

Qn2j. Will the Council's intended preparation of an online LDP site database as part of the Annual Monitoring Report suitably address the Welsh Government concerns about the lack of clarity of delivery of the Strategy and especially `the linkages between Table 3.1, Policies COM1 and COM2, paragraph 6.1.5 and the PLA1 settlement hierarchy? (64.15)

The Council will await the response from Welsh Government.

- 2.6 Several representors who are promoting alternative sites suggest that more greenfield land should be released for housing to provide 'flexibility' (753.1; 784.3; 787.4; 788.1; 788.10; 792.1; 1063.1; 1239.1; 1245.1; 1255.1; 1255.8; 1255.14; 1255.19). The Council considers this to be unnecessary and that it would undermine the Plan's strategy.

Qn2k. Why is more flexibility needed?

The Council does not believe there is a need for added flexibility as there is adequate flexibility already built into the plan by allocating approximately 1000 dwellings above the 9000 dwellings required under Strategic Policy SP12 AND THE 'built-in' flexibility associated with the PLA sites, as described above.

Qn2l. Would greenfield sites be likely to be developed first because of their lower development costs and lower alternative use values?

The Council does have a concern that greenfield sites will be developed before brownfield sites in certain situations. However, the Council accepts it is a wrong assumption that greenfield sites are automatically more viable and deliverable than brownfield sites in all circumstances.

For example, if there is only one large greenfield site in a Development Plan then the land owner(s) is likely to demand a large premium over the existing use value and there maybe higher infrastructure cost associated with the site which would make it comparable with the costs associated with a brownfield site. However if there are several greenfield sites in the plan landowners may consider taking a much lower premium, dependent on personal or local circumstances, than brownfield sites where landowners often have higher land value aspirations due to the competing alternative use values. In addition, the development and infrastructure costs and land assembly associated with smaller greenfield sites are often lower and easier than brownfield sites as these often require remediation before any development can commence and maybe in multiple ownership.

Therefore, the Council accepts that it is wrong to argue that greenfield sites are more viable and deliverable per se than brownfield sites. In this respect, the Council considers that it will depend on a range of factors including the number of greenfield sites in the plan, the size of the greenfield sites, the site location, the infrastructure costs and the willingness of landowners to bring sites forward.

Setting aside development costs and the alternative use values, the Council is concerned that 'greenfield' sites, on the edge of settlements, maybe perceived as being better located from a developers marketing perspective due to the greater likelihood of proximity to the countryside, with houses being sold on the basis of "semi rural location". Such marketing techniques could result in the developer commanding higher market values and therefore an increase in the profit margin, which could in some instances be an incentive to develop such sites first.

Qn2m. Would such development support the regeneration-led strategy or undermine it?

The preference of the LDP Strategy is for the development of land within urban areas, especially on previously developed 'brownfield sites', before considering the release of greenfield sites. Given this position the Council considers that the release of greenfield sites for flexibility could potentially undermine one of the main principles of the Regeneration-led Strategy especially that relating to the delivery of key large-scale 'brownfield' sites which are fundamental elements to its delivery and the achievement of the LDP Vision.

- 2.7 The Countryside Council for Wales seeks the amendment of Policy SP1 to provide that the scale of development should reflect the environmental capacity of an area to accommodate growth. (54.16)

Qn2m. Is that necessary or is it suitably addressed by reading the LDP as a whole to include policies SP2, PLA4, and ENV4-6?

The Council relies on the response detailed in Consultation Report Volume 2: Appendix I (SD08):

"The Council considers that the LDP sufficiently covers this issue in Policy SP2, PLA4, ENV4, ENV5 and ENV6. It is not considered necessary to formulate a policy and supporting text which replicates these provisions."

SRGA Boundaries and Settlement Hierarchy

- 2.8 Policy PLA1 sets out a settlement hierarchy and provides that development within these settlement boundaries will be 'at a scale commensurate' with their role and function. Whilst the background papers help to demonstrate how the settlements have been assessed and classified, the Welsh Government comments that it is not clear how this links to the strategy for their development and especially how levels of housing growth at the smaller settlements are to be controlled (64.14).
- 2.9 In response the Council refers to Background Paper 12: Housing Distribution (SD46) which explains the distribution of housing allocations according to both size of settlement and the SRGAs and which also highlights the distribution of extant permissions on small sites. That paper affirms that the allocations made accord with the Regeneration Led Strategy and indicates that '15% of the total housing supply is expected to be from Windfall and Small Sites however this will be managed by Strategic Policy SP1 and the settlement boundaries associated with the settlements defined in Policy PLA1.'

Qn2o. Is PLA1 directed at all forms of development or only at housing? If the latter, should that be made explicit in the interests of coherence?

PLA1 is directed at all forms of development that is appropriately located within settlement boundaries and is not directed at development types that can be appropriately located in the countryside.

Qn2p. SP1 says that: 'In particular, development will be focused in the [SRGAs].' Paragraph 3.1.15 in support of PLA1 says that 'The identified settlements will continue to be the main focus of future planned development.' How are these statements to be reconciled when Pencoed and Pyle/Kenfig Hill/North Cornelly are listed as main settlements and have strategic employment allocations but are not included in the SRGAs?

The LDP Strategy focuses development in the four SRGAs however it does not preclude future development in other settlements such as Pencoed and Pyle/Kenfig Hill/North Cornelly. The Council considers that Policy PLA1 compliments Strategic Policy SP1 and it clearly shows that all the identified settlements will continue to be the main focus of planned development. However, the LDP Strategy is not Settlement-Led and has focussed development based on the regeneration needs

and priorities of the County Borough which has meant not all the 'Main Settlements' have been identified as a SRGA.

The regeneration-related activities in the County Borough are widespread and it was considered that the deliverability of some of these could be enhanced and secured in whole or in part by directing new development to specific areas and at particular sites, the successful regeneration of which will provide significant regeneration benefits. Taking into account the spatial distribution of regeneration activities, sites and needs, development is directed to specific settlements and parts of the County Borough which will benefit the most and where there are opportunities for securing the greatest positive impacts and benefits of growth.

Qn2q. As long as a proposed windfall development lies within a defined settlement boundary how will it be assessed whether its scale is 'commensurate with the role and function of the settlement'?

Each of the settlements defined under PLA1 have clearly defined settlement boundaries which have been reviewed and amended where appropriate to accurately define the urban area from the countryside. This provides certainty and direction in terms of where appropriate development will be permitted; encouraging the re-use of land and buildings and protecting the countryside from inappropriate development that may have an adverse effect on its rural character.

Depending on the type of windfall development proposed, policies set out in other chapters and sections of the plan will be used to control future proposals. For example, future housing development will be, in the first instance, spatially managed by Strategic Policy SP1 and the settlement boundaries associated with the settlements defined in Policy PLA1. The development will be then considered against SP2 which is the starting point for the assessment of all planning applications along with Policies COM3 – Residential re-use of a building or land and COM4 Residential Density. Other policies, relating to transportation and environment may be relevant depending on the location and specific details of the proposal.

In addition, in the case of local service centres and small settlements the settlement boundaries have been drawn in such a way that 'unallocated' land within them and consequently the potential for windfall development precludes development at a scale that would not be commensurate with its size and function.

- 2.10 Some Representors seek the redesignation of Pencoed as a strategic location for both employment and residential development (851.5 & 851.15-19).

Qn2r. Would that be a fifth SRGA?

A Regeneration Strategy for Pencoed has been adopted as SPG by the Council (SD66). The focus of this document is on community-based projects improving the physical, environmental and economic well being of the area. The data outlined in the Strategy indicates that Pencoed itself is not an area facing significant social and economic problems and therefore would not merit being defined as a SRGA in the context of regeneration-led strategy.

Additionally, the Council does not consider that there is a sufficient 'critical mass' of development potential in Pencoed to warrant its designation as a SRGA. The settlement of Pencoed is highly constrained by flood plain to the east and south,

common land to the north and the issue of highways capacity over the railway line to the west (Policy PLA6 refers). These issues could seriously delay the implementation of any significant development proposals in the town during the Plan period.

Qn2s. What effect would that have on the regeneration-led strategy?

Whilst designating Pencoed as a SRGA could potentially bring forward funding for the small-scale projects in the Pencoed Regeneration Strategy more quickly, given the constraints mentioned above, it would also require the release of greenfield sites in order to do this. The Council considers that, on balance, this would not be an appropriate way forward and would prejudice the implementation of the wider regeneration-led strategy which focuses development in other areas of the County Borough where the economic impact of development would be greater.

The likely scale of greenfield development in certain locations in Pencoed to overcome the highway capacity issues west of the railway line and the requirement for a 'developer' funded new over-rail bridge would be such that, in the context of the overall housing requirement, other areas of the County Borough, more aligned to the delivery of the regeneration-led strategy would need to be foregone; thereby undermining the LDP strategy.

Qn2t. Would there be a conflict with the Wales Spatial Plan which does not recognise Pencoed as a key settlement?

The Council consider that the designation of Pencoed as a SRGA would undermine the aspirations of the Wales Spatial Plan (WSP). The WSP identifies 'key settlements' where: *"The focus for these places will be to create affordable and attractive places to live with a choice of transport to and from jobs and services"*. Pencoed is not classified as such a settlement. If this area was designated as a SRGA the full potential of the key settlements of Bridgend, Porthcawl and Maesteg would not be achieved, in accordance with the Spatial Plan aspirations.

Qn2u. Does the strategic development permitted and planned nearby at Llanharan in Rhondda Cynon Taff have any bearing on this?

The development of 1850 dwellings together with associated commercial and community facilities near Llanharan will undoubtedly contribute to catering for any market need for new residential development in the Pencoed area for the foreseeable future. Indeed, by the necessary release of more easily developed Greenfield sites in Pencoed envisaged above, this could dampen developer appetite for the Llanhran / Llanillid site thereby prejudicing the implementation of that scheme which is a Strategic Site necessary to implement the Rhondda Cynon Taff Local Development Plan adopted in 2011. As a corollary to this, from a cross-boundary perspective, the Strategic Employment Site at Pencoed (SP9(3) refers) is also ideally located to serve the new development at Llanillid and the housing allocations in the western part of RCT.

- 2.11 Notwithstanding their physical separation and the intervening M4 motorway, South Cornelly was included with North Cornelly as one settlement in the Settlement Role and Function Study (SD49) from which the Council says the settlement classification was derived. However in PLA1 North Cornelly is now defined with Pyle

and Kenfig Hill as a 'main settlement' and South Cornelly is defined as a separate 'small settlement'.

Qn2v. What is the reason for now excluding South Cornelly from being part of that main settlement and why was it previously included? (851.2)

The Settlement Role and Function Study (SD49) sought to use low level data from the 2001 Census and NOMIS (where available) to best access the role and function of the County Borough's settlements. This process resulted in specific information for a large selection of individual settlements, however in some instances it necessitated the joint results for a series of settlements located within the same LSOA. This was the case for North Cornelly, South Cornelly, Mawdlam and Kenfig. However in respect of service, retail and community provision North and South Cornelly were assessed as separate settlements.

Notwithstanding that North Cornelly and South Cornelly were combined for data analysis purposes; given their clear physical separation, of 0.29 miles, and national policy to protect the identity of individual settlements, the Council considered it appropriate to maintain them as two separated entities.

The Council also considered that given that there is no physical separation between the settlements of North Cornelly, Pyle and Kenfig Hill and their role and function complement each other they are more suitably considered as one main settlement under Policy PLA1.

- 2.12 Coity is defined by PLA1 as a small settlement and there are no housing allocations. However it is close to other major development allocations to the north west and south west. The Proposals Map shows that the settlement closely adjoins the Bridgend SRGA but that the village is subject to a number of environmental designations including two Green Wedges, a conservation area and an area of archaeological significance.

Qn2w. Is it these environmental constraints that the Council considers make the settlement unsuitable for inclusion in the SRGA rather than a risk of undermining the regeneration strategy, as the Council suggested in its response to Representation 850.5?

There is no doubt that there are significant environmental constraints within and surrounding Coity which the Council considers adds to its argument that the village should not be identified as being situated in the SRGA. The Council's response to representation 850.5 should be interpreted generally in that it would not want to see development diverted away from the SRGAs to ensure their integrity and that of the Plan strategy. It is also the case that to include the village of Coity within the Bridgend SRGA could undermine its very special character and identity.

Qn2x. Could all development in the Plan be accommodated at Bridgend as one Representor suggests and, if so, would that accord with national policy, and what would be the implications for the rest of the authority's area? (1212.5)

It would not be possible to accommodate all of the proposed development in Bridgend as the representation suggests without major releases of greenfield sites for development. This could lead to the coalescence of Bridgend with several of its

outlying villages (including Penyfai, Coychurch, Laleston and Coity) which is against national policy to protect the identity of individual settlements. By concentrating all development in Bridgend, and not dispersing it around the County Borough in accordance with the regeneration-led strategy contained in the LDP, large parts of the area will not experience much needed economic development and growth and the associated benefits which development can bring to an area. Neither would such a concentration achieve the aims of the Spatial Plan, which seeks to focus development in all of Bridgend's key settlements, including Porthcawl and Maesteg.

The Council considers that the approach it has adopted in the LDP is sensible and sustainable.

Implementation of Regeneration Strategies

- 2.13 Policy PLA2 states that 'Development likely to have an unacceptable or detrimental impact on the implementation of a regeneration strategy/programme will not be permitted'. Several Representors object to this on the basis that they consider that it would prevent greenfield development and development which has other (different) benefits (1239.4; 1245.3; 1255.10; 1255.21).

Qn2z. As written the Policy would preclude not only unacceptable impacts but also any acceptable detrimental impact as well. Should it read 'Development likely to have an unacceptably detrimental impact etc.'?

The Council agrees that the suggested wording improves the clarity of the Policy and suggests the following MAC change:

Policy PLA2

Implementation of Regeneration Strategies

Development likely to have an ~~acceptable~~ unacceptably or detrimental impact on the implementation of a regeneration strategy/programme will not be permitted.

Qn2aa. As greenfield development of unallocated land outside settlements would contravene Policy ENV1, is Policy PLA2 necessary?

Policy PLA2 is not specifically directed at greenfield development but development that would undermine a regeneration strategy. The LDP Strategy has been developed to provide a land-use framework, which will help realise the regeneration aspirations and priorities of the Council.

In recognition of the regeneration needs and priorities of the County Borough, the Council already has in place and is developing a range of site-specific and area based Strategies, Programmes and initiatives which form a comprehensive vision for the future of the areas concerned.

Therefore the Regeneration-Led Spatial Strategy puts in place a policy framework that can best deliver the regeneration needs of the County Borough. In this respect the Council considers that Policy PLA2 provides a clear policy statement that development which is contrary to the objectives and aims of the regeneration strategies, or hinder their implementation will be resisted.

Qn2bb. What examples of other forms of development might be controlled by the policy?

Examples of unacceptable proposals are development which results in out-of-town convenience and / or comparison goods proposals which could undermine town centre vitality and viability, poor quality design of schemes or buildings. The cumulative impact of small-scale new development and changes of use will also be monitored to ensure that there are no longer term detrimental effects. It may be necessary to resist even these developments if there is a likely risk to a strategy.

Additionally, better control of otherwise 'acceptable' countryside developments and/or infrastructure in areas that are growing their tourism product defined as part of a wider regeneration programme. The policy represents an added safeguard against the loss, via, for example, a change-of-use application, of a commercial facility, such as a public house, which is a key facility for the promotion of tourism.

Conversely, the Policy could be worded 'positively' to state that development which supports the aspirations of a regeneration programme will be favoured. This, for example, could support the establishment of small commercial elements identified in a regeneration strategy such as those associated with a tourism enterprise.

Design

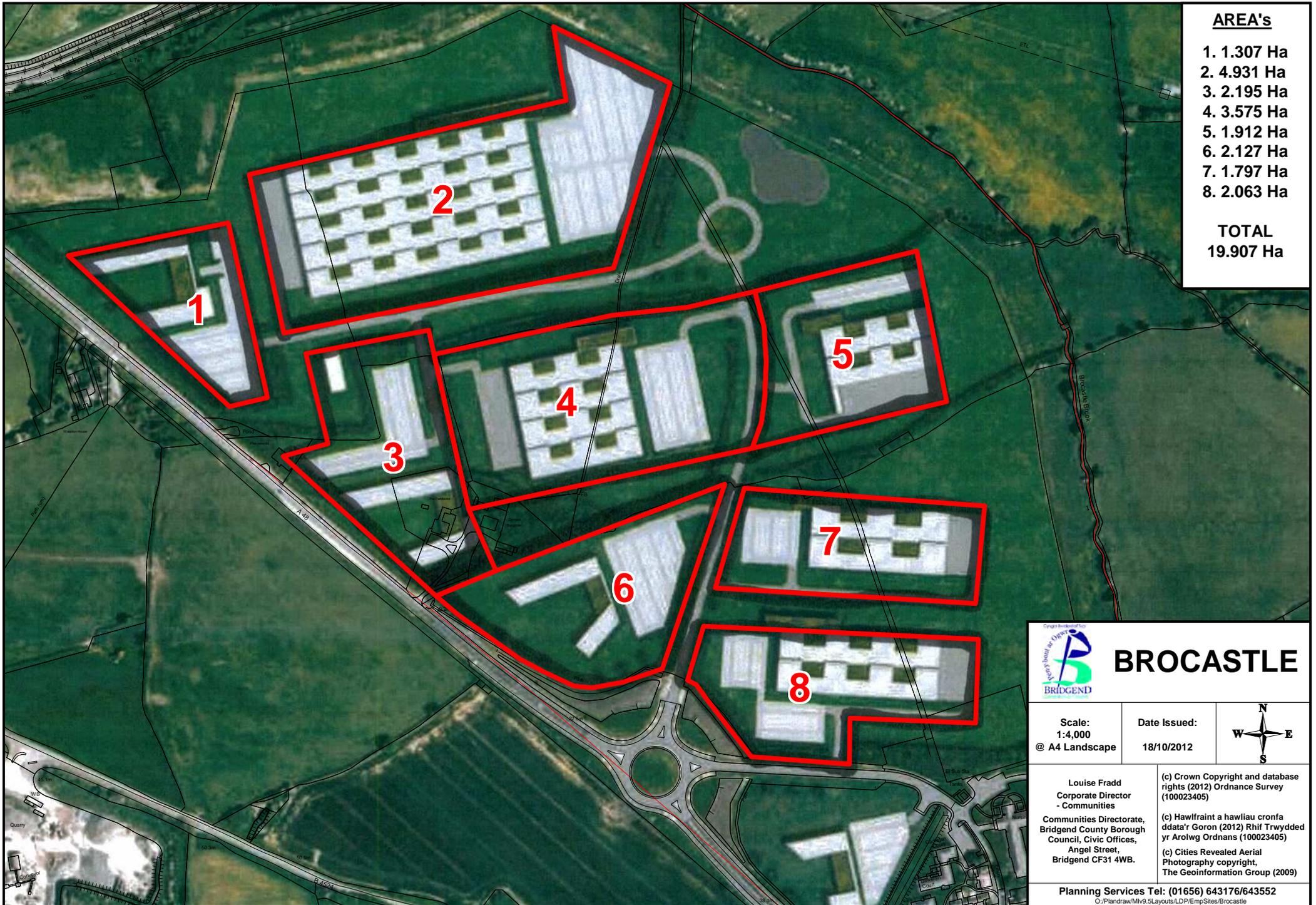
- 2.14 Design Policy SP2(4)(ii) seeks to use land efficiently by preferring the development of previously developed land to greenfield development and is the subject of a representation of objection (1212.5).

Qn2cc. As it reflects national policy at Section 4.8 of Planning Policy Wales, would a different approach risk making the plan unsound?

The Council relies on the response detailed in Consultation Report Volume 2: Appendix I (SD08) and considers SP2(4) (ii) accords with the overarching principle set out Section 4.8 of Planning Policy Wales. To focus new development on greenfield sites without considering previously developed land opportunities would not align with PPW and the LDP Strategy.

With specific reference to housing, the Council would again reference paragraph 9.2.8 of PPW (WD37) which specifically states that "*in identifying sites to be allocated for housing in development plans, local planning authorities should follow a search sequence, starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and then new development around settlements with good public transport links.*"

Appendix A



AREA's	
1.	1.307 Ha
2.	4.931 Ha
3.	2.195 Ha
4.	3.575 Ha
5.	1.912 Ha
6.	2.127 Ha
7.	1.797 Ha
8.	2.063 Ha
TOTAL	
19.907 Ha	

		<h1>BROCASTLE</h1>	
<p>Scale: 1:4,000 @ A4 Landscape</p>	<p>Date Issued: 18/10/2012</p>		
<p>Louise Fradd Corporate Director - Communities</p> <p>Communities Directorate, Bridgend County Borough Council, Civic Offices, Angel Street, Bridgend CF31 4WB.</p>		<p>(c) Crown Copyright and database rights (2012) Ordnance Survey (100023405)</p> <p>(c) Hawlfraint a hawlau cronfa ddata'r Goron (2012) Rhif Trwydded yr Arolwg Ordnans (100023405)</p> <p>(c) Cities Revealed Aerial Photography copyright, The GeoInformation Group (2009)</p>	
<p>Planning Services Tel: (01656) 643176/643552 <small>O:/Plandraw/M/v9.5/Layouts/LDP/Ermp/Sites/Brocastle</small></p>			

Appendix B

Draft Travel to Work Areas based on the 2001 Census LSOAs

CODE	DRAFT TTWA NAME
205	Llangefni & Amlwch
206	Holyhead
207	Pwllheli
208	Machynlleth
209	Dolgellau & Barmouth
210	Porthmadog & Ffestiniog
211	Rhyl & Denbigh
212	Colwyn & Conwy
213	Swansea
214	Llandrindod Wells
215	Newtown
216	Aberystwyth
217	Cardigan
218	Pembroke & Tenby
219	Haverfordwest
220	Carmarthen
221	Bridgend
222	Cardiff
223	Merthyr
224	Ebbw Vale & Abergavenny
15	Liverpool
17	Wirral, Chester & Flint
49	Hereford & Leominster
50	Ludlow
51	Brecon
53	Cinderford & Monmouth
54	Telford & Bridgenorth
57	Bristol
82	Wrexham
83	Crewe
124	Newport & Cwmbran
153	Shrewsbury
154	Oswestry

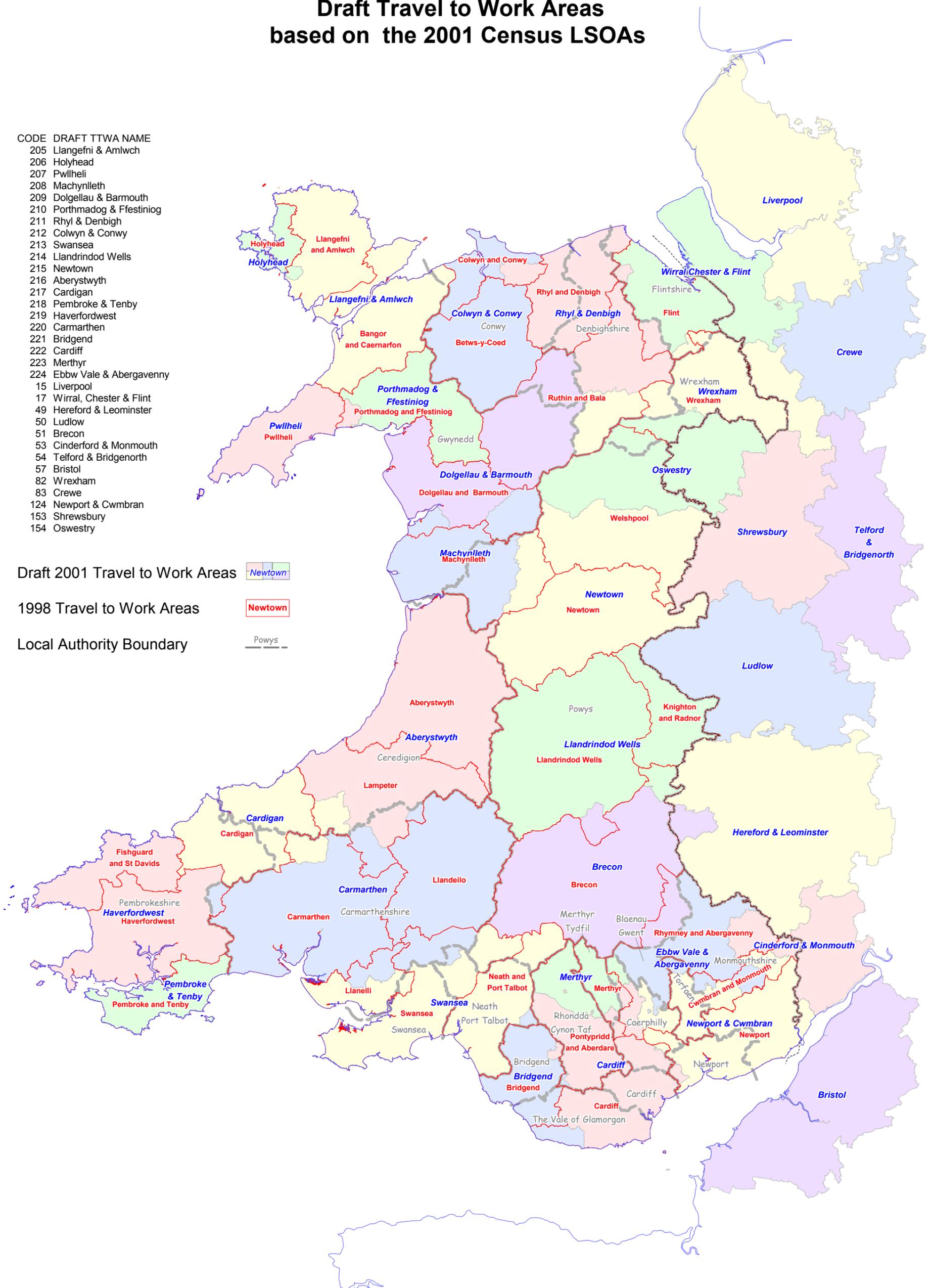
Draft 2001 Travel to Work Areas



1998 Travel to Work Areas



Local Authority Boundary



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Mae'r map hwn yn seiliedig ar ddeunydd yr Arolwg Ordnans gyda chaniatâd Arolwg Ordnans ar ran Rheolwr Llyfrfa Ei Mawrhydi, © Hawlfraint y Goron 2007.

Mae atgynhyrchu heb ganiatâd yn torri hawlfraint y Goron a gall hyn arwain at erlyniad neu achos sifil. Cynulliad Cenedlaethol Cymru. Rhif trwydded 100017916.

Appendix C

Appendix C: Greenfield and Previously Developed Land

Policy COM1: Residential allocations in the Strategic Regeneration Growth Areas

Bridgend Strategic Regeneration Growth Area

Policy Reference	Location	Settlement	Greenfield	Previously Developed Land
COM 1 (1)	Parc Derwen	Bridgend	1500	
COM 1 (2)	North-East Brackla Regeneration Area	Bridgend	245*	105*
COM 1 (3)	Parc Afon Ewenny Regeneration Area,	Bridgend		550
COM 1 (4)	Coity Road Sidings	Bridgend		140
COM 1 (5)	South Wales Police, Cowbridge Road	Bridgend		130
COM 1 (6)	Land East of Masonic Hall, Coychurch Road	Bridgend	95	
COM 1 (7)	Jubilee Crescent	Bridgend	40	
COM 1 (8)	South of Joslin Road	Bridgend	34	
COM 1 (9)	Brocastle Estate	Bridgend		30
COM 1 (10)	Waterton Manor	Bridgend		36
COM 1 (11)	Brackla Street	Bridgend		19
COM 1 (12)	Parc Farm, North East of Parc Derwen	Bridgend		14
COM 1 (13)	Waterton Lane	Bridgend	11	
COM 1 (14)	6-10 Queen Street	Bridgend		10
		Total Units	1925 (65.05%)	1034 (34.95%)

*Residential Allocation located on both Greenfield and Previously Developed Land elements of PLA3(2).

Maesteg & Llynfi Valley Strategic Regeneration Growth Area

Policy Reference	Site Name	Settlement	Greenfield	Previously Developed Land
COM 1 (15)	Maesteg Washery Regeneration Area	Maesteg		135
COM1 (16)	Ewenny Road	Maesteg		125
COM1 (17)	Coegnant Reclamation Site	Caerau / Nantylffyllon		100
COM1 (18)	Crown Road	Maesteg		40
COM1(19)	Former Blaencaerau Junior School	Caerau		35
COM1 (20)	Y Parc,	Maesteg	20	
COM1 (21)	Land South of Cwmfelin Primary School	Cwmfelin	20	
COM1 (22)	Llynfi Lodge	Maesteg		13
COM1 (23)	Land Adj to 50 Heol Tywith	Nantylffyllon	13	
		Total Units	53 (10.58%)	448 (89.42%)

Porthcawl Strategic Regeneration Growth Area

Policy Reference	Site Name	Settlement	Greenfield	Previously Developed Land
COM1 (24)	Porthcawl Waterfront Regeneration Area	Porthcawl		1350
COM1 (25)	Former Sea Bank Hotel Car Park,	Porthcawl		60
COM1 (26)	Pwll-Y-Waun	Porthcawl	40	
COM1 (27)	Albert Edward Prince of Wales Court	Porthcawl		35

COM1 (28)	MOT Centre Station Hill,	Porthcawl		11
COM1 (29)	The Nurseries, New Road,	Porthcawl		10
		Total Units	40 (2.66%)	1466 (97.34%)

Valleys Gateway Strategic Regeneration Growth Area

Policy Reference	Site Name	Settlement	Greenfield	Previously Developed Land
COM1 (30)	Land West of Maesteg Road	Tondu		436
COM1 (31)	<i>Parc Tyn Y Coed</i>	Bryncethin	323	
COM1 (32)	<i>Ogmore Comprehensive School</i>	Bryncethin		130
COM1 (33)	Gateway to the Valleys	Tondu		100
COM1 (34)	<i>Former Christie Tyler Site</i>	Brynmenyn		75
COM1 (35)	Bryncethin Depot	Bryncethin		50
COM1 (36)	Land at Abergarw Farm	Brynmenyn	50	
COM 1 (37)	Glanyrafon	Tondu		30
		Total Units	373 (31.24%)	821 (68.76%)

			Greenfield	Previously Developed Land
		TOTAL	2391 (38.81%)	3769 (61.19%)

Policy COM2: Residential allocations outside the Strategic Regeneration Growth Areas

	Site Name	Settlement	Greenfield	Previously Developed Land
COM 2 (1)	Land SW of City Road	Bettws		80
COM 2 (2)	City Farm	Bettws	40	
COM 2 (3)	R/O Heol Dewi Sant	Bettws	11	
COM 2 (4)	Land adjoining Cwm Ogwr Fach	Blackmill		43
COM 2 (5)	Cae Gleision, Broadlands	Bridgend	284	
COM 2 (6)	Ysgol Bryn Castell,	Bridgend		150
COM 2 (7)	Chelsea Avenue	Bridgend		110
COM 2 (8)	Llys Fitzhamon, Bridgend	Bridgend	41	
COM 2 (9)	Cefn Glas Road	Bridgend		10
COM 2 (10)	Coed Parc	Bridgend		20
COM 2 (11)	Former Wildmill Boiler House	Bridgend		10
COM 2 (12)	Former Abercerdin School	Evanstown		11
COM 2 (13)	Former Goricon Site	Kenfig Hill		29
COM 2 (14)	Troed Y Ton	Kenfig Hill		39
COM 2 (15)	Pant Yr Awel Court	Pant Yr Awel		19
COM 2 (16)	Ty Nant, Heol Llangeinor	Llangeinor	10	
COM 2 (17)	Waunwen	Nantymoel		35
COM 2 (18)	Cwrt Colman Street	Nantymoel	21	
COM 2 (19)	Heol Y Fedwen / Haul Bryn	Nantymoel	11	
COM 2 (20)	Marlas Farm	North Cornelly	48	
COM 2 (21)	Land at Gibbons Way	North Cornelly		45
COM 2 (22)	Ffordd yr Eglwys (land off),	North Cornelly	22	
COM 2 (23)	Thomas Crescent (land adjacent)	North Cornelly,	14	
COM 2 (24)	South of Hendre Road	Pencoed,	35	
COM 2 (25)	2 Penprysg Road	Pencoed		12
COM 2 (26)*	Former Surgery Site, Coychurch Road	Pencoed		13
COM 2 (27)	Pencoed Primary School	Pencoed		10
COM 2 (28)	Land Rear of Ty Draw Close	Pyle	30	
		Total	567 (47.13%)	636 (52.87%)

