

Bridgend Local Development Plan Examination

Hearing session 1: Strategy and Vision

Response of the Countryside Council for Wales (CCW) (Representation ID: 54)

Chapter 1 – Introduction and Background

Q1a Is it Implicit that the plan is to be read as a whole or should there be a statement to that effect or further cross-referencing in the interests of coherence?

We acknowledge that it is considered implicit that a Development Plan should be read as a whole. Whilst that may be the case to many users of the Plan, we do not consider that this is necessarily evident to all users of the plan, particularly people that have little or infrequent contact with the Plan. The lack of such knowledge can lead to an applicant only considering certain elements of the Plan, for example that a site has been allocated for a particular type of development, but failing to have regard to other relevant parts of the document such as policies on the conservation and enhancement of the natural environment and nature conservation.

Therefore to ensure that it is clear to all users of the planning system that the LDP is intended to be a coherent document where consideration needs to be given to the plan as a whole and not isolated elements of it, we recommend that a statement is included in the Plan to state that it should be read as a whole.

Q1b. Should the Plan be seeking at 1.1.2 to ‘build upon and add value’ to the national Wales Spatial Plan?

Planning Policy Wales (PPW) advises that LDPs should set out a vision based strategy for the plan area that has regard to the Wales Spatial Plan (WSP)¹, and that they should reflect the policy goals of the WSP². Further, one of the tests of soundness of the Plan is that it should have regard to the Wales Spatial Plan.

There is no requirement that it should seek to build upon and add value to the Wales Spatial Plan, only to demonstrate that it has had regard to it.

¹ PPW para 2.1.3

² PPW para 4.6.1



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Q1c Having regard to coherence, is it appropriate in LS1 to describe recognised international, national and regional environmental features as key local needs and issues?

PPW and Tan 5 Nature Conservation and Planning advise that the town and country planning system in Wales should ‘ensure that the UK’s international and national obligations for site, species and habitat protection are fully met in all planning decisions;’

There is therefore a key national need to ensure that the international and national status of some of the nature conservation and biodiversity interests within the county and the legal obligations regarding the conservation and enhancement of their features is fully recognised in the LDP.

Additionally, given the location of the settlements and areas recognised in NR3, Porthcawl, and NR4, the valleys, in close proximity to international and national environmental features it will be important to ensure that appropriate consideration is given to the aims of balancing the requirements to address the issues set out in NR3 and NR4 with the requirements of national legislation and planning policy to meet international and national obligations for site, species and habitat protection.

To ensure the coherence of the issues identified in this part of the Plan, we therefore consider that the international and national issues identified in LS1 should be identified as key national and regional needs and issues.

Chapters 2&3 – The Plan Strategy /Producing High Quality Sustainable Places

Objectives

Q2a 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?

It should not be necessary to modify 1c, but as objective 1e promotes sustainable and attractive valley settlements, it is inferred that there is not the same requirement for sustainable development at the other towns and areas identified in the objectives. There is therefore a coherence issue here.

Given the sensitivity of the natural environment within the vicinity of Porthcawl, and the international and national status of some of it, it is of prime importance that the regeneration of the area is compatible with the legal obligations regarding the conservation and enhancement of the environment, particularly designated sites and protected species.

Therefore, if the word ‘sustainable’ is retained in objective 1e, we consider it is necessary that Objective 1c is modified to repeat the word ‘sustainable’ in relation to the regeneration of the Porthcawl waterfront.

Q2b 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?

CCW considers that it is suitably addressed through further amplification in paragraph 2.3.32.



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Prif Swyddfa/Headquarters

MAES-Y-FFYNNON, PENRHOSGARNEDD, BANGOR LL57 2DW FFÔN/TEL: 01248 385500 FFACS/FAX: 01248 355782

<http://www.ccw.gov.uk>



Q2c Does Objective 2e also need to repeat national policy in PPW aimed at reducing energy demand and improving energy efficiency?

CCW does not consider that objective 2e should repeat national policy in PPW, but that it should translate into local terms how the Plan will seek to minimise energy demand and energy efficiency.

Q2d In Objective 3f, what does ‘realistic’ mean when describing town and district centres and is use of the term coherent?

No comment

Q2e 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?

CCW did raise some concerns relating to environmental considerations and the assessment of the regeneration-led spatial strategy. In CCW’s response to the SA Environment Report, we expressed concerns that BCBC needed to reassure themselves that they were complying fully with the requirements of the SEA Directive, as there had been a tendency to underplay the environment and focus on ‘sustainability’ issues in the report.

While ‘sustainability’ encompasses environmental considerations, we would normally have expected to see more explicit reference to environmental protection in the assessment and report, particularly as the principal goal of the SEA Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of the plan.

The summary of the assessment of the regeneration-led spatial strategy – that it performs ‘quite well in helping to achieve sustainable development’ – is not very informative. It would have been invaluable to have a reference to where more detailed details of assessment can be found. We also noted that the results of the SA assessment for the regeneration led Strategy (Appendix 4 of the SA Environment Report) contain much uncertainty, particularly against the ‘environmental’ objectives.

For the assessment of the spatial strategies, a number of assumptions were made. Whereas most of them may be reasonable, the assumption that ‘policies will be in place to mitigate against adverse impacts on the natural environment’ is not compatible with the aim of assessing the respective significant environmental effects of the three options. It should be part of the role of this assessment to identify what form such policies might take and what they will need to consider with respect to each of the proposed options.

The Council does not appear to have clearly justified why they have pursued certain options in the regeneration strategy notwithstanding them having negative impacts for the environment. It may be that much of this work was undertaken as part of the assessment. However ‘the working out’ has not been demonstrated in the report, or through any subsequent work that we are aware of, to understand how some of the conclusions on the environment have been reached.

Employment and the Economy

Q2f

No comment





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Regeneration Led Development

2.7 Environmental capacity of an area to accommodate growth

Q2m Is that necessary or is it suitably addressed by reading the LDP as a whole to include policies SP2, PLA4, and ENV4-6?

Although environmental capacity is addressed by reading the Plan as a whole, no guidance is contained in the LDP as to what weight should be given to environmental capacity when there is a conflict between development contributing to regeneration and the environmental capacity of the area. The Plan should include reference as to what will take priority when such conflict arises.



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