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INTRODUCTION

The Local Development Plan process is new and Bridgend Town Council (BTC), although it has sought advice as to the hearing procedure and attended the pre hearing (notes of the pre hearing have been provided), it wishes to present the following observations to clarify its previous submissions which also reflect the concerns of local people and the community of 'allotmenteers'. This submission concerns Coity Sidings and the possible allotment status. The following observations follow the Inspector's 'Agenda with Matters and Issues' format using the Inspector's paragraph numbering and headings.

3 PLA3(3) Coity Road Sidings, Bridgend

3.1 BTC Intention

BTC in its original submission it was stated "Coity Sidings should be considered for new allotment site to address under-provision in the town." It understands the Council's response but it was never the intention that the entire 6.7 hectares be allocated as an allotment. In paragraph 4.1 of the Strategy reference is made to statistics such as "Growing in the |Community, Good Practise Guide" and the National Society of Allotment and Leisure Gardeners (NASLG) . If that had been the case BTC would have been requesting approximately 260 plots (plot size 250 sq metres) at a single location.

That was not the intention.

The Allotment Strategy

For ease of reference BTC refers to the following sections of the Strategy relying on the statement that all the objectives are inter-related;

Strategy Objectives

5.5 Objective 5: To review the existing provision of allotments in Bridgend County Borough and seek to identify areas of potential future allotment provision Bridgend County Borough and seek to identify areas of potential future allotment provision.

The "audit" of allotments showed an overall surplus of allotment provision throughout the Borough. However, it also identified areas as having a deficit in the supply of allotments and priority will be given to providing any new sites, or bringing abandoned plots back into beneficial use, in those sub-areas identified as having a deficit. This is primarily the Bridgend sub-area although small deficits have also been identified in the Garw Valley and Valleys Gateway sub-areas. [BTC underlining]
Of equal importance is the need to safeguard the Council's existing allotment sites. The Council's Development Plan Policies are designed to protect existing provision provided the Council can produce evidence to prove that there is a need to that facility (i.e. the facility is being used to capacity, there is a deficit in provision in the area, or there are waiting lists for the area). [BTC underlining]

The Inspector's is referred to the phrase "*However, it also identified areas as having a deficit in the supply of allotments and priority will be given to providing any new sites, or bringing abandoned plots back into beneficial use, in those sub-areas identified as having a deficit.* This is primarily the Bridgend sub-area although small deficits have also been identified in the Garw Valley and Valleys Gateway sub-areas. [BTC underlining]

Clearly BTC picks up the thread of strategic intention when it refers to Coity Siding' especially responding to the second paragraph above where there is *deficit and waiting lists*.

BTC does not envisage the total loss of Policies COM1(4), REG1(3), PLA7(8) and Transportation Proposals (35.2). It seems to BTC that there should be an additional allocation to clarify that the 6.47 hectares is expected to support an Allotment Site. The extent of allotments managed by BTC is shown below.

Table 1: Allotment Statistics (BTC)

Allotment	Type	HA	Plots
Great Western Avenue	Statutory	1.047	47
Cochurch Road Gardens	Statutory	0.178	13
Jubilee Road	Statutory	0.318	16
Wauncil Avenue	Statutory	0.450	35
Dunraven Park	Statutory	0.309	15
	Totals	2.302	126

3.2 BTC Response to the Council

The Council has used the words 'realism' and 'deliverable' in its response and has stated that "if opportunities arise within the plan period to support the delivery ... there are policies within the plan to support ..."

BTC suggests that it would be better to indicate in the LDP at Coity Siding "an area will be required to incorporate a site COM14(3) for Allotments".

Qn3a. What is the Town Council's response to the Council's comments and the Background Paper?

BTC comments in response to the Council are incorporated into the above and BTC has reflected up the Supplementary Planning Guidance – Coity Sidings Development Brief <http://www.bridgend.gov.uk/web/groups/public/documents/report/014301.pdf> which does not specifically refer to allotment/s but to Recreational Open Space. This Brief was approved in 1998 and would need to be updated.

We do support the LDP and its incorporation of Allotment Strategy and it contains a good basis to develop policy as is seen in 21 instances in the LDP where it refers to Allotments and particularly welcome is the prospect of a "Green Infrastructure Plan" through a Supplementary Planning Guidance (SPG) refer LDP paragraph 4.1.25.

BTC suggests that this future SPG should be the subject of consultation with Town & Community Councils in the first instance.