

# **Bridgend Local Development Plan**

## **Examination**

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

**Tuesday 29 January 2013 10.00am**

### **Session 14 – Delivery Implementation Monitoring Review**

#### **Inspector's Agenda with Matters and Issues**

*[Figures in brackets ( ) identify a Representor and their representation number eg 64.16 refers to Representor 64 and their Representation 16].*

#### **1. MONITORING AND REVIEW – MATTERS RAISED BY REPRESENTORS**

- 1.1 Whilst the Welsh Government (WG) recognises the commitment to ensure that the key objectives and policies of the plan are monitored and the work undertaken to date, it considers there is merit in reviewing the indicators to determine if they and the trigger points categorising performance are appropriate, in all instances. The WG also raises some more specific points (64.16).
- 1.2 The Council responds that the framework contained within the LDP strategy and policies together with the monitoring framework outlined in Chapter 7 of the LDP provides an appropriate context for monitoring the implementation of Plan.
- 1.3 The main matters and issues raised in representations are addressed below in the same order as the subjects are set out in Chapter 7.
- 1.4 In Section 2 of the Agenda the Inspector raises further matters and issues from a review of the remaining targets and indicators in Chapter 7.

#### Strategic Development Distribution

- 1.5 WG comments that there appears to be no indicator monitoring the delivery of the strategy, spatially. It would be helpful if the plan could demonstrate that the appropriate scale of growth is being delivered in line with the spatial hierarchy set out in the plan. The monitoring framework does not seem to include trigger points for housing in the Strategic Regeneration Growth Areas (SRGAs), only for employment, and as long as the plan is delivering 500 dwellings per annum it does not appear to matter where they are located (64.16).
- 1.6 The Council responds that the delivery of the spatial strategy is monitored by IND1 which relates to the level of housing and employment development within the SRGAs. IND1 refers to the percentage of total housing and employment development that takes place in the SRGAs and Strategic Employment sites rather than elsewhere. The Council suggests that in each case at least 70% of development is expected to occur within these areas.

- 1.7 In practice the text of the IND1 trigger combines housing and employment in one 70% target and it also combines the SRGAs (which provide for housing and employment) and the Strategic Employment Areas (which only provide for employment).

**Qn1a. Is IND1 intended to require that (a) 70% of employment development takes place in the SRGAs and Strategic Employment Sites and that (b) 70% of housing development takes place in the SRGAs? If so does the wording need to be clarified such that it clearly identifies that there are separate targets for both housing and employment and which requires both targets to be met?**

Design and Sustainable Place Making

- 1.8 A Target at page 69 seeks "*To minimise the number of developments permitted in the flood plain or which decrease water quality*". The associated IND6 indicator refers to Environment Agency Wales observations on development control applications. Status would be green if no applications are approved in any given year against Environment Agency Wales advice. A yellow/red trigger would be if more than 5%/10% of applications in the flood plain were approved contrary to that advice.
- 1.9 WG comments that other indicators could better reflect national planning policy (e.g. TAN15 'Development and Flood Risk' which states that residential Class C3 development should not be permitted in C2 flood risk areas).
- 1.10 The Council responds that it would be inappropriate to simply monitor development in the floodplain per se as defined in TAN15 as further, detailed flood consequences assessment work may indicate that development is acceptable in these locations. Monitoring of the Environment Agency Wales objections is more effective to realistically monitor this issue.
- 1.11 The Local Development Plan Manual seeks that an output indicator for LDPs should be 'amount of development (by TAN15 paragraph 5.1 development category) permitted in C1 and C2 floodplain areas not meeting all TAN15 tests (paragraph 6.2 i-v). TAN15 is qualified by setting out the circumstances in which development of different categories may be permitted in flood risk areas according to the vulnerability of the development, the degree of risk, and other factors such as the justification test. Some of these factors require judgement and technical expertise in which EAW could have an important role.

**Qn1b. Is the Council suggesting that there would be circumstances where EAW advice would support development contrary to TAN15?**

**Qn1c. Are the 5% and 10% triggers realistic having regard to the likely number and type of planning applications in a flood plain in any one year?**

**Qn1d. Are they supported by any estimates of the number of such applications in recent years?**

- 1.12 CCW welcomes the flood and water quality target but points out that the associated indicator (IND6) does not include an indicator for water quality. CCW recommends that the indicator should therefore be amended to reflect Dwr Cymru Welsh Water observations in relation to water quality and quantity in response to planning application consultations (54.92).
- 1.13 The Council responds that notwithstanding the appropriateness or otherwise of this suggested change, the Council consider that this does not go to the soundness of the Plan. However, the Council offers no evidence to counter this representation given the limited impact such a change will have on the application of the Plan and any subsequent outcome as a result of implementation.

**Qn1e. If the LDP has no means of monitoring water quality why is the target included? Also the CCW observations add an additional reference to water quantity. Does the Council consider that to be appropriate/necessary?**

**Qn1f. What specific wording change is sought by CCW to the target, indicators, status and triggers?**

- 1.14 In relation to a target to minimise the loss of natural habitats whilst curbing the spread of invasive species, Indicator IND8 at page 69 is defined as '*Loss of natural habitats without mitigation or translocation of species*'.
- 1.15 The Countryside Council for Wales (CCW) considers this unworkable and that it does not meet the test of soundness CE3. As quite large areas of biodiversity habitat could be lost before the policy is reviewed, other triggers as well as a black trigger indicator may need to be considered to review the policy once a specified area (cumulatively) of habitats from the Natural Environment and Rural Communities Act (NERC) section 42 list has been lost to development and its associated infrastructure (54.93).
- 1.16 The Council considers that the framework contained within the LDP strategy and policies together with the monitoring framework outlined in chapter 7 of the LDP provides an appropriate context for monitoring the implementation of Plan. Monitoring the number or land area of sites protected by national/regional/local environment allocations would not necessarily reflect the reality of the situation in that acceptable development could take place on these sites which could offer positive mitigation measures. In addition, it may not be the planning system per se which has an impact on this situation. Other legislation provides for the protection of protected species and habitats. It is therefore considered more appropriate to monitor planning application outcomes for this issue. In relation to IND16, a black trigger is not considered necessary in this instance as a red trigger would require a policy review which would examine the way in which the policy is being implemented which could give rise to the need for further officer or member training and the protection of additional guidance where appropriate.

**Qn1g. How would natural habitat be defined for the purpose of monitoring?**

**Qn1h. The NERC Section 42 list refers to 544 species rather than defined areas of habitat. Would it be a workable definition for monitoring natural habitat? and, if so,**

- i) Would it be appropriate to define the area of such habitat to be lost?**
- ii) How would that area be measured and the data collected?**

**Qn1i. Why does the target related to IND8 include curbing the spread of invasive species if there is to be no related monitoring?**

**Qn1j. Why are the triggers limited to major development?**

### Natural Environment

- 1.17 A target at page 71 states that: *'No appropriate development [sic] will take place in designated sites for nature conservation'*. The related Indicator IND 16 refers to *'CCW/Countryside section observations on development control applications.'*
- 1.18 As currently worded, CCW considers that the [IND16] target to prevent "appropriate development" is confusing. In addition the target does not seem to monitor adverse impact on designations from development located outside those designated sites, or differentiate between the hierarchy of different types of designation. CCW therefore recommends that the target is amended to read: *"No development will take place which will adversely affect the integrity of statutory designated sites"*. Further CCW does not consider that the proposed triggers are appropriate to ensure that development does not have adverse effects on designated sites or affect their integrity. As CCW are unlikely to comment on all applications that affect local or regionally designated sites, a more appropriate trigger will be to measure areas lost or adversely impacted by planning permissions granted. Additionally, there is the potential for cumulative impacts on designated sites or the cumulative loss of BAP habitat from SINCs from development falling below the major development threshold, which should be measured. It is not only major applications that result in biodiversity loss or harm to designated sites. CCW would be happy to discuss appropriate triggers and indicators for this policy further with the authority (54.94).
- 1.19 The Council accepts that there is an error in the wording of the target IND16 which should read "inappropriate" rather than "appropriate". However (as a typographical error) the Council are willing to accept the proposed change by the representor and would offer no objection to this should the Inspector be minded to recommend such a change and do not consider that it goes to the heart of the Plan. Whilst CCW are not consultees on development proposals situated in areas of local or regional importance, the Council's Countryside section is; hence their inclusion in the indicator also. The Environment Agency will also comment on related issues. The Council does agree that it is not only major applications which will have an impact on designated sites, and would offer no objection to this should the Inspector be minded to recommend that the word 'major' is deleted from the yellow and red triggers

of IND16; it considers that such a change does not go to the heart of the Plan.

**Qn1k. Will the Council include its agreed wording changes on a schedule of suggested Matters Arising Changes?**

**Qn1l. Has CCW suggested triggers and indicators to the Council to support its representations?**

#### Air Quality

- 1.20 Another target provides that '*Air quality levels will be maintained or improved.*' The related Indicator 17 refers to the '*Number of Air Quality Management Areas designated in Bridgend County Borough*'.
- 1.21 Given that other factors, beyond the control of plan policies may influence air quality, CCW suggest that the Monitoring Framework identifies this target and associated indicator as 'contextual' outputs of the framework (54.95). The LDP Manual at page 109 comments on the use of contextual indicators.
- 1.22 The Council responds that it has not introduced 'contextual' indicators into the LDP; however it considers that such data and information could be introduced as necessary as a supplement to an Annual Monitoring Report. IND17 specifically refers to Air Quality Management Areas (AQMAs) which could be a key determinant on the impact of new development in the County Borough. It therefore considers that no change should be made to the Plan.

**Qn1m. Is this a soundness issue and does CCW wish to respond to the Council's comments?**

**Qn1n. Why is the target to not have Air Quality Management Areas? Would this target deter the management of poor air quality?**

#### Employment Land Development

- 1.23 At page 74 there is a target to develop 88.5ha of land for employment uses during the plan period. However the associated IND24 seeks a 10-year average of 4ha per annum or 3ha per annum. The LDP has a 15-year time frame.

**Qn1o. How would a 10-year average delivery of 4ha employment land per annum (Total 40ha) achieve green status if the target is to deliver 88.5ha of employment land over 15 years (15 years x 4ha = 60a)?**

**Qn1p. As the Plan is unlikely to be adopted until at least the 7th year of the LDP period, over what period would the 10-year average be calculated and how would this contribute to the 4-year review period at paragraph 7.1?**

## Housing and Affordable Housing

- 1.24 WG comments that some of the indicators themselves may require further refinement, such as ensuring the provision of a 5-year housing land supply throughout the whole plan period, and being able to respond if affordable housing is not being delivered.
- 1.25 The Council responds that Indicators on the 5 year housing land supply and affordable housing delivery are included at IND31 and IND33.
- 1.26 These issues are also being considered at Sessions 2 and 3. For example in its written statement for Session 3 the Welsh Government commented that it is critical that the monitoring framework has suitable indicators and triggers to ensure a gypsy/travellers site(s) could come forward to meet the identified need over the plan period binding the authority into such action as is necessary.

**Qn1q. Should there be any change to the related Targets and Indicators arising out of the discussion on housing and affordable housing and gypsy/traveller sites at Sessions 2 and 3?**

**Qn1r. If the overall Plan target is to provide 9,000 homes throughout the plan period, why would the delivery of 500 dwellings per annum over 15 years (Total only 7,500) achieve green status? (IND32, p75)**

**Qn1s. The 9,000 homes target would average 600 homes per annum. Average delivery over 15 years could not be calculated until year 15 which is too late for monitoring purposes. What then is meant by the IND32 '15-year average' delivery of homes?**

**Qn1t. Policy SP12 does not suggest a fixed annual figure throughout the LDP but refers instead to housing delivery at different rates in each of three 5-year periods as follows:**

<b>2006-2011</b>	<b>1,940 dwellings (= 388 per annum)</b>
<b>2011-2016</b>	<b>2,681 dwellings (= 536 per annum)</b>
<b>2016-2021</b>	<b>4,379 dwellings (= 876 per annum)</b>

**Should this be reflected in the Targets and Indicators rather than the IND32 single annual average target rate of delivery of 500 dwellings (or 600 dwellings)?**

**Qn1u. Could an alternative yellow trigger point be when annual housing delivery drops below 500 (or 600 or another set figure) in 1 year and an alternative red/black trigger be when it drops below that figure in 2 or 3 successive years?**

**Qn1v. How does the IND33 green status for delivery of 80 affordable dwellings per annum (=1,200 over 15 years) relate to the 1,350 overall target?**

**Qn1w. Should the affordable housing indicators be adjusted for the later years of the LDP period given the low rate of delivery already experienced in the early years of the LDP period (only 31 affordable dwellings delivered between 2006-2009 – SD42) and, if so, what should that figure be?**

**2. MONITORING AND REVIEW – FURTHER MATTERS RAISED BY INSPECTOR**

Other Output Indicators

2.1 Paragraph 9.5.4 of the Local Development Plans Manual (2006) lists a series of other output indicators for LDPs which paragraph 9.5.3 regards as essential for assessing the implementation of national policy. No further national guidance has since been issued. Although there is a brief reference at LDP 7.6, many of these output indicators are not included in Chapter 7. However it is possible that some of the indicators are of less relevance now than at the time that the manual was written.

**Qn2.1. Should Chapter 7 include any more of the other output indicators listed in the Local Development Plans Manual?**

Smart Targets and Indicators

2.2 The Local Development Plan Manual (LDPM) provides at 9.5.2 that authorities should adopt the 'SMART' approach to defining targets and indicators wherever practicable<sup>1</sup>. In that regard many of the suggested targets in Chapter 7 would not be measurable. However the 'Green Status' often provides a more measurable 'target' for the Plan to aspire to.

2.3 Having regard to the above considerations there could be scope to simplify the Framework as follows:

<b>Indicator</b>	<b>Target</b>	<b>Policy Research Trigger</b>	<b>Policy Review</b>	<b>Plan Review</b>
[Current Indicators used as a heading]	[Combined current Targets and "Green Status"]	[Currently 'Yellow Status'] This should lead to 'Review' if failure is found to be due to the failings of the Plan and/or its policies.	[Currently Red Status]	[Currently Black status]

**Qn2.3 Should the Framework be revised on the above lines?**

Further Comments on the Chapter 7 Individual Indicators, Targets and Triggers

2.4 These comments are listed under the section headings and Indicator references currently used in Chapter 7.

**Strategic Development Distribution**

IND1

<sup>1</sup> Specific, Measurable, Achievable, Realistic and Time-bound

- 1.1 See Section 1 above.

## IND2

- 2.1 In relation to the implementation of Strategic Employment sites, the IND2 trigger relates to whether or not there is ongoing discussion with the Welsh Government.

**Qn2A. Would a more measurable alternative for a red or black trigger be whether relevant planning permissions have been granted by a set date?**

## IND3

- 3.1 Target – If a new mixed housing and employment development goes ahead in line with the strategy but is within a ward that is currently within the top 100 most deprived wards, then the proportion of people living there would increase unless and until the local economy improves. In that regard no time scales are suggested over which the change should be measured.

**Qn3A. Does this target clash with Indicator 1 relating to location of housing/ employment?**

**Qn3B. Trigger – Why is there no red trigger?**

## IND4

- 4.1 Target – Broadening the economic base usually refers to diversification of the economy whereas here the monitoring relates to overall economic activity rates rather than within different economic sectors or locations.

**Qn4A. Is this target needed?**

**Qn4B. How does it relate to the spatial objectives of LDP Objectives 1a, 1b, 1c and 1d?**

- 4.2 Triggers – The triggers aim to ensure the target is delivered.

**Qn4C. What can the LDP do beyond making employment land available?**

## Design and Sustainable Place Making

## IND5

- 5.1 The Green Status provides a target of adopting Built Heritage Strategy/Supplementary Planning Guidance but not by a certain date.

**Qn5A. Could a date be included?**



- 5.2 Triggers – The triggers refer to the reviewing of policy/ plan if planning applications are approved contrary to the SPG. However, the applications should be refused based on development plan/ national policy whilst having regard to the BHS/SPG and any other material considerations. If decisions are contrary to the BHS/SPG then that would suggest either that the guidance is not being applied or that it is being outweighed by other policy or material considerations.

**Qn5B. Is it the guidance that would need to be reviewed or the LDP?**

IND6

- 6.1 See Section 1 above.

IND7

- 7.1 The target seeks to raise the general levels of development adaptation to Climate Control and the triggers seek that consideration is given within Design and Access statements

**Qn7A. Why do the targets refer only to major developments when policies SP2 and PLA4 (Climate Change and Peak Oil) cover all developments?**

IND8

- 8.1 See Section 1 above.

## **Strategic Transport Planning**

IND9

- 9.1 The green status seeks 'progression' on Regional Transport Plan developments.

**Qn9A. Should the green status trigger relate more clearly to the delivery of schemes in accordance with the timetable? For example 'Development of the strategic transport improvement schemes listed in PLA7; to be delivered in accordance with the RTP delivery timetable'?**

IND10

- 10.1 This would require annual monitoring of traffic levels across the County Borough on an annual basis.

**Qn10A. Is this already done and, if not, would this be too onerous a task given that no red trigger is proposed?**

**Qn10B. Do overall traffic levels necessarily indicate congestion or are there other available measures such as queue lengths?**

IND11

11.1 No comment.

IND12

12.1 No comment.

IND13

13.1 The target is to locate development near to facilities to reduce the need to travel. The triggers seek that 60% of development is within 30mins public transport travel time of a range of facilities.

**Qn13A. Is this target necessary given the IND1 requirement to concentrate 70% of development in SRGAs?**

**Qn13B. Should the target refer to reducing the need to travel (which would include all forms of travel) or to reducing the need to travel by private car?**

## **Natural Environment**

IND14

14.1 No comment.

IND15

15.1 The trigger levels seek to limit to 2 the number of applications to be permitted in a year which 'contribute to the coalescence of settlements'

**Qn15A. Is this intended only to apply to the loss of Green Wedge land (as the Green Status implies) and, if so, should it be more explicit?**

IND16

16.1 See Section 1 above.

IND17

17.1 See Section 1 above.

## **Built Environment**

IND18

18.1 Target – The target and Green Status refer to all developments.

**Qn18A. Why do the triggers only cover major applications?**

**Qn18B. What is being measured by the triggers:**

- **5% of all major applications attract an unresolved CADW etc objection?**
- **5% of major applications in or affecting a designated building or area attract an unresolved CADW etc objection?**

**Qn18C. Is the red trigger of 10% contrary to CADW advice too high? Would it be more appropriate to state decisions contrary to CADW advice for 2 consecutive years?**

## **Minerals**

IND19

**Qn19A. Further to the Minerals Session 10, is an additional target needed to maintain a supply of non-aggregate stone, specifically limestone for the steel industry?**

**Qn19B. Given the duty to maintain a supply, should the yellow trigger refer to 1 year as opposed to '2 years in succession'?**

IND20

**Qn20A. Is the trigger point of '3 sterilising developments' too high given national policy on this matter?**

## **Waste**

IND21

21.1 The relevant policies are listed as SP7 and ENV17. However ENV17 is an energy policy. The waste policies are ENV14, ENV15 and ENV16.

21.2 Target – The target appears to be consistent with SP7. However the 'Green status' is meaningless.

**Qn21A. Should it refer to the waste management capacity permitted as a percentage of the total capacity required as identified in the Regional Waste Plan (220,000 tonnes per annum)? [see LDP manual paragraph 9.5.4]**

**Qn21B. Why does Indicator 21 relate to 'discussions with developers' whereas the triggers relate to the permitted capacity of waste management sites relative to the regional waste plan and which corresponds to the LDP target and the output indicator recommend in the LDP Manual 2006?**

21.3 Trigger – The yellow and red triggers refer to the provision of less than 50% or 25% of the required waste capacity by 2015.

**Qn21C. As this would be the ninth year of the 15 year LDP period, should these figures be significantly higher eg 75% and 50%?**

## **Energy Generation, Efficiency and Conservation**

IND22

22.1 The relevant policies are listed as SP8, ENV18 and ENV19.

### **Qn22A. Should ENV19 read ENV17?**

22.2 The target is to adopt the Policy ENV17 Energy Opportunity Plan as SPG by 2013.

### **Qn22B. Is that likely now to be achievable?**

IND23

23.1 Policy ENV17 seeks the submission of energy assessments with planning applications for major development to investigate incorporating on-site zero and low carbon equipment or connecting to existing sources of renewable energy.

### **Qn23A. Should the triggers relate more specifically to these assessments rather than the less defined requirement to 'give consideration to the generation of renewable energy'?**

### **Qn23B. As this is a policy requirement, why would the 5% and 10% (as stated under the Yellow and Red Triggers respectively) be permitted?**

### **Qn23C. In the alternative would it be feasible to monitor how many assessments result in the implementation of zero/low carbon and renewable energy in major developments?**

## **Employment Land Development**

IND24

24.1 See Section 1 above.

IND25

25.1 Target – Green status seems to provide a target that is consistent with that of the JHLAS process.

### **Qn25A. How is 'short term' employment land supply defined? Eg 5 years to be consistent with housing land supply?**

### **Qn25B. Why do the triggers relate to the availability of 20% of the allocated vacant employment land?**

### **Qn25C. If 5 years is short term should 33% be genuinely available as this is a third of the plan period (i.e. a third of Plan period equating to a third of the requirement) or does the target assume that not all of the allocated land will be taken up (say 60% take-up)?**

## **Retailing and Commercial Centres**

IND26

**Qn26A. There does not appear to be any difference between the Green Status and the Yellow trigger in relation to IND28 on page 74.**

**Qn26B. How should the IND28 yellow trigger be expressed?**

26.1 Vacancy rates are likely to differ between the three town centres.

**Qn26C. Is the vacancy rate intended to trigger study or a review if the rate rises above the set level in all three centres or only in one centre?**

**Qn26D. If the latter should the triggers refer to 'Bridgend , Maesteg or Porthcawl'?**

IND27

**Qn27A. Should the 'Red Trigger' be 3 years rather than 4 for consistency with other triggers in this Monitoring Framework?**

IND28

**Qn28A. Should the target relate more closely to a measurable objective as expressed in the Green Status column?**

**Qn28B. The yellow trigger appears to be the same as the green status. Should it include a percentage shortfall figure (as does the red trigger)?**

## **Tourism**

IND29

29.1 No comment.

IND30

30.1 No comment.

## **Housing and Affordable Housing**

IND31

31.1 See Section 1 above.

IND32

32.1 See Section 1 above.

IND33

33.1 See Section 1 above.

## **Community Uses**

IND34

**Qn34A. As the suggested targets and indicators do not accord with SMART objectives how would they be assessed to see if they were satisfied?**

### **3. DELIVERY AND IMPLEMENTATION**

3.1 The Welsh Government comments that although Chapter 9 of the plan 'Delivery and Implementation' provides a helpful context illustrating the phasing and delivery issues associated with each site, this is not true in all cases. For example, PLA3(3) (page 80) identifies 140 dwellings at Coity Road Sidings to be implemented and funded through the private sector. Whilst this is phased during the later two thirds of the plan period, there is no information regarding possible constraints, relevant infrastructure or costings/funding source. It is not expected that the minutiae should be identified, rather the generality. However, there do appear to be instances where greater clarity will assist demonstrating deliverability of the plan. It may also be appropriate to consider how any relevant policy would influence the phasing of development (64.5).

3.2 CCW comments that a number of sites have been specifically identified in paragraphs 6.22 to 6.25, 6.52 to 6.55, and 6.96 to 6.100 (together with specific measures outlined in paragraph 6.108) of the HRA Screening and Assessment: Bridgend County Borough LDP (June 2011) which should be screened to determine whether a site specific HRA is required at the planning application stage. Therefore, for improved clarity, CCW suggests that an additional column is added to the table in Chapter 9 to clearly identify that there will be a screening requirement for proposed developments at these sites. Please see also the Representor's comments to:

- a) Policy PLA3(9) Pwll y Waun, Porthcawl
- b) Policy REG1(15) Pwll y Waun, Porthcawl
- c) PLA3(10) Land West of Maesteg Road
- d) Policy PLA7(24) Junction 36 of M4 – Park and Share scheme
- e) Policy SP9(2) Island Farm
- f) Policy REG1(8) Waterton Industrial Estate
- g) Policy REG1(18) Brynmenyn Industrial Estate
- h) Policy PLA8(5) Access to Island Farm Strategic Employment Site, A48.

(54.96)

- 3.3 The Council considers that Section 9 (Delivery and Implementation) of the deposit LDP gives sufficient information to enable the reader to ascertain the general status and likely implementation dates of a site or proposal allocated in the Plan. However, it also recognises that the deliverability of a site is an ongoing, evolving process. Specific site details are constantly changing and new issues may arise post plan-making stage. To this end, it is proposed that an online LDP Site Database is established which is kept up-to-date and formally published once a year as part of the LDP Annual Monitoring Report (AMR).
- 3.4 The Council has prepared Background Paper 10 'Delivery & Implementation' which includes relevant references under 'Other Issues/Comments' for these sites. This paper is an intended precursor of an online LDP site database to accompany the Annual Monitoring Report. In the context of Policy PLA3(3) the land owners have produced a Planning Brief outlining various constraints to development and this has been submitted in support of the allocation.

**Qn3a. Do the proposed LDP Site Database and this proposal suitably address the Representors' concerns and should the database be referenced in the LDP?**

- 3.5 Chapter 9 provides for the phasing of development in three 5-year periods.

**Qn3b. Does Chapter 9 require updating for any allocations where development has not commenced as forecast in 2006-2011?**

- 3.6 A matter first raised at Session 9 was a concern of the Welsh Government that the implications of infrastructure delivery on the housing provision and employment allocations in terms of phasing should be clarified and could be included in Chapter 9/ Appendix 3 (64.6). The Council responded that the delivery of the LDP is not dependent on large significant infrastructure projects, most developments will require local mitigation for example provision of on-site open space or local highways upgrades, these will still be financed with Section 106 agreements.
- 3.7 A related matter raised at Session 2 Housing was that the Porthcawl Waterfront development is a large development that is important to the delivery of housing, retailing and other uses but is not progressing at the speed envisaged in the Plan. The Supplementary Planning Guidance prepared in 2007 (SD55) refers to a significant amount of infrastructure that would be funded there by S106 agreements including sea defences, ground stabilisation and transport infrastructure. The SPG comments that '*In the event of development proceeding in phases, it will be essential for the early phases to bear their fair share of the costs*'. The Background Paper 10 Delivery Implementation refers to a phased approach and includes a long list of infrastructure requirements but does not indicate how their provision is to be ensured at the appropriate time.

**Qn3c. Has further consideration since been given to how the infrastructure on which the allocation depends will be funded and phased and how that will impact on the delivery of the site?**

**Qn3d. Are there other major allocations in the Plan with similar issues?**

**Qn3e. Should Chapter 9 incorporate more information on the delivery of infrastructure where it is the critical to the delivery and phasing of development?**

**Qn3f. In addition, or in the alternative, can such information be included in the proposed Site Database?**

6 November 2012