

BRIDGEND
REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Matter 1: Plan Preparation and LDP Strategic Framework

Issue – Is the LDP legally compliant, and is the Plan’s Strategy justified and likely to be effective in ensuring that development needs of Bridgend can be met in a way that contributes to the achievement of sustainable development?

Plan Preparation

1. Has the LDP been prepared in accordance with the requirements of:

a) The approved Delivery Agreement, including the Community Involvement Scheme?

Formal Council resolution to submit the Replacement LDP for examination was originally due to be sought on 14th September 2022 in accordance with the DA. However, due to the death of Her Majesty Queen Elizabeth II, all Council meetings for the two weeks commencing 12th September 2022 were postponed. This necessitated formal resolution being sought on 19th October 2022 instead, which took the Replacement LDP beyond the agreed 3-month slippage period set out in the 2nd Delivery Agreement (DA) Revision, agreed on 10th December 2021. Nevertheless, on 14th September 2022, Welsh Government’s Chief Planner stated, “I wish to confirm that submission of the plan following formal resolution from Council at the 19 October meeting will not be in conflict with the 2nd revised DA. This position reflects the national significance of recent events, and there being no adverse effect on stakeholders”. This letter has been made publicly available in accordance with the requirements set out in Regulation 10, accompanying the 2nd revised DA.

The Replacement LDP has otherwise been prepared in accordance with the DA, and the Council has undertaken consultation in accordance with the CIS at each appropriate stage of Plan preparation. Further details can be found in the (SD29) Initial Consultation Report and (SD4) Deposit Consultation Report.

b) The Well-being of Future Generations Act (Wales) (2015)? And

Yes, the Replacement LDP has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the Well-being Goals. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is

considered through the Sustainability Appraisal (SA) process and reflected in the use of the Local Well-being Goals in framing the strategic objectives and the strategic policies. The Replacement LDP's objectives link into the Well-being Goals, and each strategic policy sets out which of the Well-being Goals it meets. Background Paper 9 (SD42) assesses each policy in respect of its compatibility with the Local Well-being Goals. The SA (SD90) and Strategic Environmental Assessment (SEA) demonstrate that the Replacement LDP has a significant positive impact on sustainable development.

c) The Equality Act (2010)?

An Equality Impact Assessment (SD71) has been undertaken, which has considered the potential impacts of the Replacement LDP upon people with protected characteristics (negative or positive). This document is a multi-purpose tool, which includes examples of how the policies and proposals help to promote equality. The appropriate steps have therefore been taken to comply with the Public Sector Equality Duty Equality Impact Assessment legislation. The Assessment helps demonstrate that the Council has shown due regard to the need to reduce inequalities of outcome resulting from socio-economic disadvantage when taking strategic decisions under the Socio-economic Duty. It also ensures consideration of the Welsh Language Standards.

Equality and Social Inclusion is also a key SA Objective. The SA (SD90) has identified no gaps in policy coverage in reducing poverty and inequality, tackling social exclusion and promoting community cohesion, including through enhancing access to community facilities. The following proposed strategic policies are predicted to have Major Positive (i.e. significant beneficial) effects on aspects of this SA Objective:

- SP6 – Sustainable Housing Strategy;
- SP7 - Gypsy, Traveller and Showpeople Sites;
- SP8 - Health and Well-being; and,
- SP9 - Social and Community Infrastructure.

2. Has the Plan been subject to a robust Sustainability Appraisal/Strategic Environmental Assessment? and have all the 'likely significant environmental effects' of the Plan and all 'reasonable alternatives' been identified, described and evaluated?

The Replacement LDP's accompanying SA Report (incorporating SEA, SD90) assesses the likely sustainability and significant environmental effects of all substantive components within the Plan (strategy, policies, site allocations, etc.) and identified reasonable alternatives. This builds directly upon previous SA reporting

including an SA Scoping Report (2018, SD89) and an Interim SA Scoping Report (2019, SD88) which accompanied the Replacement LDP Preferred Strategy.

The SA Report demonstrates how the SA, incorporating SEA, process has informed the development of the Replacement LDP, including the incorporation of recommended changes. Each substantive component or proposal, together with any identified reasonable alternatives, have been subject to a proportionate level of assessment against the SA Objectives defined within the finalised SA Framework. As a result, the SA Report concludes that there is good coverage of all key sustainability issues in the Plan, with plan components performing well against the SA Framework. It also identifies strong compatibility between the Replacement LDP Vision/Objectives and the SA Framework, plus no likely significant adverse effects (taking account of mitigation in all its forms).

3. Has the Plan been subject to a robust Habitats Regulations Assessment? Where 'likely significant environmental effects' have been identified, has an adequate Appropriate Assessment been undertaken?

All substantive components of the Deposit Plan, and thus the emerging Replacement LDP, have been subject to HRA in accordance with statutory requirements. The HRA (SD75, 2021) was published to accompany the Deposit Plan, building on previous stages of HRA. This documented the findings of an Appropriate Assessment carried out to identify any likely significant effects on the integrity of European Sites in the context of their conservation objectives. The HRA concluded that the Replacement LDP is not likely to have significant effects on any of the identified European sites, either alone or in combination with other plans or projects. The policies, proposals and measures incorporated into the Replacement LDP are considered appropriate to sufficiently protect European sites from development contained within the Plan and provide improvements in air quality.

4. Does the HRA take account of National Resources Wales advice regarding phosphate levels in Riverine Special Area of Conservation?

Although the advice by NRW was published (February 2022) prior to completion of the HRA (May 2021), the Council is aware of the advice and has considered the subsequent impact upon the rivers within the County Borough boundaries as part of Replacement LDP preparations. Consequently, as none of the Boroughs rivers are identified under the designation of Riverine Special Area of Conservation, the advice is not considered applicable.

5. Is the Plan consistent with Future Wales: The National Development Framework?

Yes, the Replacement LDP is considered to be in general conformity with Future Wales (NDF), as detailed within Background Paper 17: Conformity with Future Wales (NDF, SD49). As part of their representation on the Deposit Plan, Welsh Government confirmed that, in their opinion, “Bridgend’s Replacement Local Development Plan (2018-2033) is in general conformity with the National Development Framework (NDF): Future Wales, as set out in paragraphs 2.16 – 2.18 of the Development Plans Manual (Edition 3)”.

6. Has the Plan had regard to the requirements of the Well-being of Future Generations Act (Wales) 2015 with regard to the well-being goals and ways of working?

Yes, the Replacement LDP has full regard to the provisions of the Well-being of Future Generations Act 2015 and to the Well-being Goals. The theme of well-being and the provisions of the Well-being of Future Generations Act 2015 is considered through the SA process and reflected in the use of the Local Well-being Goals in framing the strategic objectives and the strategic policies. The Replacement LDP’s objectives link into the Well-being Goals, and each strategic policy sets out which of the Well-being Goals it meets. Background Paper 9: Compatibility of the Replacement LDP Objectives Against the Bridgend Local Well-Being Plan (SD42) assesses each policy in respect of its compatibility with the Local Well-being Goals. The SA (and SEA, SD90) demonstrate that the Replacement LDP has a significant positive impact on sustainable development.

7. Have there been any significant changes in national policy or local circumstances since the LDP was placed on deposit? if there have, what are the implications of these changes for the Plan? do they need to be addressed through the preparation of new evidence and/or revisions to the Plan? what is the intended timescale for this work?

There have not been many significant changes in national policy or local circumstances since the Replacement LDP was placed on Deposit. The main change is in relation to TAN15. The forthcoming revised TAN15 is based on a Flood Map for Planning that includes projections showing future flood risk areas because of climate change. The inclusion of such projections has caused some significant increases in the extent of the highest risk flood zones. Three allocations (proposed at Deposit Stage) were affected;

Firstly, the Flood Map for Planning has demonstrated that Parc Afon Ewenni is no longer deliverable for residential uses, and the housing allocation has therefore been removed from the Replacement LDP.

Secondly, the initial modelling showed that Land East of Pencoed was affected. However, detailed modelling was submitted to Natural Resources Wales (NRW) and the Flood Map for Planning has since been updated. There are no barriers to the allocation being retained in this respect.

Thirdly, most of Porthcawl and Newton are protected by existing coastal flood defences that protect existing property against a 1in200year tidal event, in the present day. This was not originally recognised in the Flood Map for Planning as not all local authority flood defence assets were picked up on the first iteration. As a result, the Council submitted a flood map challenge to NRW, which was approved. A TAN15 Defended Zone has now been attributed to most of Porthcawl and Newton via the November 2022 Update of the Flood Map for Planning. This is recognised in the SD63 Bridgend Strategic Flood Consequences Assessment (SFCA) Update (2022) prepared to support the Replacement LDP. The Porthcawl Flood Defences Scheme will be completed in March 2023 and will add a further layer of protection to safeguard the existing community from flooding and the effects of flooding. The defences also provide a coincidental opportunity to realise wider regeneration and placemaking benefits for the area through the delivery of Porthcawl Waterfront. On this basis, it is considered that the Porthcawl Waterfront site can be developed in full compliance with the requirements of the future revised TAN15. It is therefore considered appropriate to re-allocate this site, with detailed consideration of flood consequences influencing scheme design at planning application stage. As per the recommendations in the SD63 SFCA Update (2022), residual effects of flooding should also be considered in a detailed Flood Consequence Assessment accompanying any future planning application. This includes consideration of defence failure, wave overtopping and tide locking. A Statement of Common Ground (SD99) has been signed between the Council and Natural Resources Wales confirming the site's suitability for re-allocation on this basis.

Moreover, the Replacement LDP has been designed to provide a flexible policy framework which can deal with unexpected and unforeseen changes in circumstances such as the Covid-19 pandemic. Refer to Background Paper 11: Covid-19 Policy Review.

Vision, Objectives and Strategy

8. Is the Plan's Vision sufficiently aspirational and locally specific to form the basis for planning to 2033? and how will they be delivered?

The Plan's Vision is designed to integrate the Replacement LDP with the Bridgend Local Wellbeing Plan, the Well-being of Future Generations (Wales) Act 2015, the Welsh Government's National Sustainable Placemaking Outcomes and thematic priorities within the NDF and Planning Policy Wales (PPW). In consequence, the

proposed Replacement LDP Vision is based around using Placemaking to achieve economic and spatial outcomes in tandem.

The Vision explains that the County Borough is undergoing incremental, long-term socio-economic renewal, such that the Replacement LDP should support existing regeneration efforts and further growth without imposing fundamental change. However, a new LDP Vision is set out which appropriately addresses the key spatial challenges and opportunities facing the County Borough. This includes existing economic strengths in advanced manufacturing, the need for improved infrastructure, new employment opportunities and the decarbonisation of key sectors, each of which will have spatial implications to deliver sustainable economic growth. The proposed LDP Vision also calls for Bridgend and other established towns (including Pencoed and Pyle, Kenfig Hill and North Cornelly) to accommodate sustainable growth, with Porthcawl, Maesteg and the Llynfi Valley accommodating regeneration-led growth. These growth areas are to all have distinct roles within a coherent network of settlements. In addition to supporting economic growth, the proposed LDP Vision recognises that this approach will maximise positive wellbeing outcomes and help to protect environmentally sensitive areas

The Vision supports a greater emphasis on the delivery of a refreshed spatial strategy and place-based policies within the Replacement LDP than the existing adopted LDP. This will enhance local distinctiveness and the ability to meet the differential needs of communities. The proposed Replacement LDP Vision is therefore considered to be appropriate and compatible with achieving sustainable development.

The LDP Vision will be delivered through the achievement of 4 Strategic Objectives, which will be underpinned by 35 Specific Objectives. These seek to reflect updated national policy and legislation and address the issues facing the County Borough. The development of the Objectives has also been informed by the SA/SEA process, particularly the succinct set of key sustainability issues which should be addressed in the Replacement LDP. These identified issues have been carried forward to underpin the SA process, thereby shaping the following four Strategic Objectives, which are central to the LDP. Refer to SD34 Background Paper 1: Vision and Objectives.

9. Are the Plan's objectives SMART and capable of delivering on the identified Vision?

Yes, the Plan's objectives are SMART and capable of delivering on the identified Vision. Acting together, the Vision and Strategic Objectives provide an overarching framework to underpin all other components of the Replacement LDP. Reflecting their importance, the Strategic Objectives have been subject to iterative testing and refinement through the SA process in tandem with preparing the Deposit Plan. Whilst necessarily high level, the resulting Strategic Objectives provide good coverage of all key sustainability issues which the Replacement LDP needs to address.

The Plan's Objectives are considered:

Specific – The Replacement LDP's Strategic Objectives are considered specific in nature and have been devised to create the right conditions to address the various social, cultural, environmental and economic well-being outcomes. The Strategic Objectives have been informed by the SA/SEA process, particularly the succinct set of key sustainability issues which should be addressed within the Replacement LDP. As such, the Strategic Objectives provide a framework for implementing the targeted issues identified from the findings of the SA/SEA process.

Measurable – The Replacement LDP monitoring framework will allow for an ongoing assessment to measure whether the underlying objectives of the plan remain valid or whether the prevailing economic, social, environmental or cultural circumstances have significantly altered since the preparation of the plan. The 4 Strategic Objectives are supported by 35 Specific Objectives. These have been devised to create the right conditions to address the various social, cultural, environmental and economic well-being outcomes. The objectives form part of the basis for monitoring the implementation of the Plan, once adopted and operational. This has enabled a set of targets and indicators to be formulated within the monitoring framework, which act as a benchmark against which performance can be measured.

Attainable – The Strategic Objectives have been defined to reflect identified key issues, align with national policy and ensure an appropriate balance between the different elements of sustainability. They are cross-cutting in their nature and also cross-reference the goals and objectives of the Well-being of Future Generations (Wales) Act 2015 and Bridgend Local Well-being Plan (LWBP). Acting together, the Strategic and Specific Objectives provide an overarching framework to underpin all other components of the Replacement LDP. A detailed assessment of the compatibility and coverage of the proposed LDP Strategic Objectives against the SA Objectives from the Bridgend LDP Review SA Framework is provided in Table D of the SA (SD90). This indicates good coverage of key sustainability objectives across the suite of proposed LDP Strategic Objectives, demonstrating the objectives are attainable.

Realistic – The proposed Replacement LDP Strategic Objectives are demonstrated to be implementable and have been subject to iterative testing and refinement through the SA process. The Strategic Objectives explicitly identify spatial priorities in the growth of key settlements, whilst seeking socio-economic, environmental, cultural or infrastructure changes in specific places within the Bridgend County Borough area. The spatial rather than solely thematic nature of many Replacement LDP Objectives support the implementation of the Replacement LDP Vision and help to avoid tensions between underlying economic or environmental policies. This has set the framework for the extensive and robust deliverability evidence within the Plan's evidence base, which further serves to demonstrate the Objectives are realistic.

Time-Based – The monitoring framework will allow for an ongoing assessment of whether the underlying LDP objectives remain valid or whether the prevailing

economic, social, environmental or cultural circumstances have significantly altered since the preparation of the plan. The AMR is fundamental to assessing the progress of the LDP in implementing the policies contained within the plan and will allow the Council the opportunity to assess the policies against the most up-to-date information available. It will also include monitoring of associated plans and documents identifying potential areas of change during the review period. The Council has constructed a set of targets and indicators which act as a benchmark against which performance can be measured. Targets may relate to the achievement of certain levels of development and may be set annually or at an interim point within the plan period. The target for the whole of the plan is to achieve the implementation of the Replacement LDP strategy, which is supported by time-based targets and an appropriate monitoring framework.

10. Does the Plan's Growth and Spatial Strategy represent an appropriate approach for delivering, managing and distributing growth over the Plan period?

Yes, SP1 sets out a clear growth and spatial strategy to help realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033.

The growth strategy will enable a necessary degree of continuity from the existing LDP by continuing to promote outstanding regeneration ambitions yet complementing them with sustainable growth at the edge of existing settlements. The level of growth aims to continue the transformation of Bridgend by enabling a more established working aged demographic, combating out-migration and minimising out-commuting. This boost to the labour force would in turn enable firms to locate or expand in Bridgend County Borough, thereby counter-balancing the ageing population. This dual faceted approach will provide significant scope to deliver necessary infrastructure, secure affordable housing and complement existing centres by linking new homes to employment and services via sustainable multi-modal forms of transport. The growth strategy is considered most appropriate to deliver against the full range of issues the replacement Plan is seeking to address and enable realisation of all four Strategic Objectives. Refer to Background Paper 2: Strategic Growth Options (SD35).

The growth strategy has been distributed to sustainable locations in accordance with the Settlement Hierarchy and Spatial Strategy. Due regard has been given to settlement accessibility, services, facilities and employment opportunities in order to promote sustainable forms of growth and patterns of movement. The Strategy has stringently followed the site search sequence in line with Planning Policy Wales. Previously developed land and/or underutilised sites located within existing settlements have been considered in the first instance, followed by suitable and sustainable sites on the edge of the Primary Key Settlement and Main Settlements. This has ensured that the new proposed housing allocations are geographically

balanced with community facilities, services and employment opportunities within existing settlements. Grouping major generators of travel demand together in this manner will help minimise the need for long journeys, reduce reliance on the private car and increase the propensity for residents to walk, cycle and utilise public transport. The Strategy is considered most appropriate to maximise delivery of affordable housing in high-need areas as identified by the LHMA, whilst enabling sustainable forms of development that meet the Replacement LDP Objectives, minimise pressure on Best Most Versatile (BMV) agricultural land and provide scope to address existing infrastructure capacity issues. Refer to SD36 Background Paper 3: Spatial Strategy Options and SD48 Background Paper 15: Best and Most Versatile Agricultural Land.

At Deposit Consultation Stage, Welsh Government commented, “The Welsh Government has no fundamental concerns on the spatial distribution of housing and employment growth, which is in ‘General Conformity’ with Future Wales”.

a) How has the Growth and Spatial Strategy been derived and is it based on robust evidence?

The Replacement LDP is based on a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the Cardiff Capital Region and Swansea Bay Region. The proposed growth level of 505 dwellings per annum is derived from a POPGROUP Scenario that Uses an ONS 2019 Mid-Year Estimate base year and calibrates its migration assumptions from a 6-year historical period (2013/14–2018/19). This period witnessed sustainable population growth, in part linked to the number of dwelling completions across the County Borough, which the Replacement LDP seeks to continue.

Maintaining this trajectory will lead to more established households (particularly around the 35-44 age group) both remaining within and moving into the County Borough, coupled with less outward migration across other economically active age groups. This will encourage a more youthful, skilled population base to counterbalance the ageing population, resulting in an overall population increase of 9.4% or 13,681 people over the plan period. This level of growth will also enable delivery of 1,595 affordable homes, thereby maximising delivery in combination with other sources of affordable housing supply in the context of plan-wide viability. This Growth Strategy is deemed the most appropriate, sustainable means to deliver the Replacement LDP Vision and Objectives as justified within the Background Paper 2: Strategic Growth Options (SD35). All reasonable alternatives have also been duly assessed under the SA process.

The Spatial Strategy is based on comprehensive, robust evidence and due evaluation of a range of reasonable alternatives. The proposed Spatial Strategy was informed by a range of key pieces of evidence including the Settlement Assessment (SD91), Plan-Wide Viability Assessment (SD81) and LHMA (SD79). On this basis, the Replacement

LDP was prepared to maximise affordable housing delivery in high-need areas, promote viable sustainable development, enable delivery of significant remaining brownfield sites and seek to minimise pressure on BMV agricultural land. Background Paper 3: Spatial Strategy Options (SD36) justifies this Strategy through evaluating a range of spatial options, each of which have also been considered as a reasonable alternative and assessed further under the SA process.

b) What are the key components of the Growth and Spatial Strategy and how do they interact?

Development will ultimately be directed towards environs conducive to sustainable placemaking that facilitate a balance of environmentally friendly, economically vibrant, and socially inclusive characteristics, aiming to benefit current inhabitants and future generations alike. Sustainable placemaking is therefore an overarching component that underpins the Replacement LDP, specifically seeking to create places that:

- Meet the needs of all members of the community;
- Promote balanced economic growth that provides access to employment opportunities;
- Provide for active travel and integrated Green Infrastructure networks;
- Provide appropriate infrastructure and services;
- Provide a range of high quality private and affordable housing; and
- Are resilient and adaptable to change and support the Councils vision to make Bridgend a decarbonised, digitally connected smart County Borough.

In order to enable the implementation of the Growth and Spatial Strategy, Policy SP2 defines a suite of Strategic Allocations where growth will be focused. The location and scale of these sites presents opportunities for sustainable new development to take place over the plan period to help meet the Replacement LDP Vision and Objectives and ensure implementation of the Regeneration and Sustainable Growth Strategy. The combined development of these sites will result in the provision of comprehensive residential, employment and commercial development whilst providing new transportation, affordable housing, community, education and recreation facilities to serve the respective sites and existing communities.

Additionally, the sites proposed for allocation within the Replacement LDP have been identified to ensure they are within close proximity of local services, places of employment, green spaces and active travel opportunities. All sites demonstrate Placemaking credentials and can be accessed via sustainable means of travel, either by walking or cycling, within a 20-minute period. This is evidenced within Background Paper 19: The 20-Minute Neighbourhood (SD51), which illustrates the associated services, facilities and sustainable travel options within close proximity to each site.

c) Does the Growth and Spatial Strategy represent a sustainable approach to planning over the plan period? and does it effectively link transportation, employment and residential growth?

The Growth and Spatial Strategy is considered likely to perform best by supporting economic growth, enabling the delivery of key infrastructure, securing affordable housing and improving connectivity without resulting in over-development. This is predicated on achieving an equilibrium between dwelling and employment provision in a manner that will complement existing centres by linking new homes to jobs and services via sustainable, multi-modal forms of transport. This will deliver against the full range of issues the Replacement LDP is seeking to address, notably achieving sustainable patterns of growth, minimising out-commuting, supporting existing settlements and helping to deliver the ambitions of the Cardiff Capital Region and Swansea Bay Region

The Replacement LDP Spatial Strategy prioritises the development of land within or on the periphery of sustainable urban areas, considering previously developed brownfield sites in the first instance. This approach ensures that development is located in areas that are within close proximity to existing facilities and services, are capable of accommodating additional growth and contain the necessary infrastructure to allow residents to meet their needs through sustainable means of travel. In this regard, the Spatial Strategy demonstrates accordance with the principles of the 20-Minute Neighbourhood, which emphasises giving people the ability to access key services and facilities within a 20-minute walk or cycle ride from home, with safe cycling and local transport options. To further support this principle, the Replacement LDP aims to reduce private car reliance and help the County Borough achieve the principles set out by the Active Travel (Wales) Act (2013). As part of this process, Active Travel Network Maps have been produced as part of the Replacement LDP process to identify the walking and cycling routes required to create fully integrated networks for walking and cycling to access work, education, services and facilities.

Table 6 within the Written Statement (SD1) illustrates how new employment and residential development is being directed to certain settlements to address the issues and objectives contained in the Plan. This spatial distribution reflects the Settlement Hierarchy (SF1) and Spatial Strategy to ensure the development of sustainable places, whilst reinforcing placemaking principles. The spatial strategy is designed to sustain economic development and incite job creation as the Growth Areas will increasingly be seen as attractive places for business to locate, given the growing employment base and availability of skilled labour.

As such, the Growth and Spatial Strategy is considered to represent a sustainable approach to planning over the plan period and it achieves this by effectively linking transportation, employment and residential growth. Refer to Background Paper 2: Strategic Growth Options (SD35), Background Paper 3: Spatial Strategy Options (SD36) and Background Paper 19: 20-Minute Neighbourhood (SD51).

d) Does the Growth and Spatial Strategy maximise the use of previously developed land? and adopt the sequential approach to the release of land as set out in Planning Policy Wales?

The Growth and Spatial Strategy is considered most appropriate to build on the successes of existing LDP strategy through prioritising the development of land within or on the periphery of urban areas, especially on previously developed 'brownfield' sites. Porthcawl, Maesteg and the Llynfi Valley will continue to remain regeneration priorities through their designation as Regeneration Growth Areas, accompanied by more community-based Regeneration Areas within the Ogmore and Garw Valleys. The ongoing commitment to brownfield development opportunities within these areas represents a necessary degree of continuity with the existing LDP, accords with the site-search sequence outlined in PPW and seeks to minimise developmental pressure on Best and Most Versatile (BMV) agricultural land.

However, given the existing LDP's success in delivering development on brownfield land, there are relatively few viable and deliverable brownfield sites remaining within the county borough. For this reason, and to ensure maintenance of a deliverable housing land supply, the strategy also seeks to identify viable, deliverable and sustainable sites elsewhere including some greenfield allocations. Accompanying growth is therefore channelled towards Bridgend, Pencoed and Pyle, Kenfig Hill and North Cornelly. This approach reflects the classification of these settlements within the Settlement Hierarchy, coupled with their high need for affordable housing, broad viability and capacity to accommodate growth in a sustainable manner. Designation of these settlements as Sustainable Growth Areas will provides a means of supporting their existing services and facilities, enabling delivery of associated infrastructure and capitalising upon their location on the strategic road and rail network.

The Strategy is therefore consistent with the site search sequence outlined in Planning Policy Wales in terms of prioritising previously developed sites and underutilised land within settlements before considering land on the edge of settlements and greenfield sites. Regeneration-led strategies for Porthcawl and Maesteg will minimise pressure on BMV agricultural land within these environs. Equally, considerable weight has been given to protecting BMV agricultural land from development (alongside other planning considerations) in other areas throughout LDP preparation and the assessment of Candidate Sites. The sequential approach to the release of land has therefore been embedded into the site selection process from the outset of plan preparation. Refer to, Background Paper 3: Spatial Strategy Options (SD36), Background Paper 15: Best and Most Versatile Agricultural Land (SD48) and Candidate Sites Assessment Report (2022, SD64).

e) Is the Strategy and policy framework consistent with national planning policy relating to Flood Risk?

Policy SP4 recognises the risk of flooding as a key effect of climate change. The Policy seeks to steer highly vulnerable development away from flood risk areas, to assess the implications of development in areas at risk of flooding and to ensure that new development does not increase the risk of flooding elsewhere. The Flood Map for Planning accompanying TAN 15 includes climate change information to show how this will affect flood risk extents over the next century, along with the potential extent of flooding assuming no defences are in place. Additionally, the Council has produced a Strategic Flood Consequences Assessment (2020, SD62), updated in 2022 (SD63), which plays an essential part in enabling a strategic and proactive approach to flood risk management. The assessment assists in understanding current flood risk on a wide spatial scale and how this is likely to change in the future in response to climate change. This information has influenced the siting and type of development allocations within the Replacement LDP and has also informed policies on flood risk whereby subsequent development proposals can be assessed. Notably, Policy DNP9 stipulates that all development in flood risk areas must be supported by a Flood Consequences/Risk Assessment and incorporate any mitigation measures required to avoid or manage increased flood risk. New Supplementary Planning Guidance will also be prepared to set the framework for a local approach to flood risk management within Bridgend Town Centre.

Furthermore, the SA (SD90) undertaken as part of the preparation of the Replacement LDP has considered the Plan's potential impacts on water, including water quality, ecosystems, sustainable use of water, capacity of sewerage, flood risk and the opportunities to improve flood risk management.

f) Is the Growth and Spatial Strategy consistent with those of neighbouring authorities? what are the main cross boundary issues and how have these been addressed?

Prior to commencement of the Replacement LDP, Bridgend explored the option of undertaking joint LDPs with Rhondda Cynon Taf and Caerphilly LPAs, although neither were progressing with their LDP reviews at that point in time. **While this position has since changed, the review timescales did not align and Bridgend therefore followed Welsh Government advice to proceed with reviewing the extant LDP in earnest.**

The preparation of the Bridgend Replacement LDP is now further advanced than other LDPs (due to be replaced) in the region. The growth and spatial strategies proposed by neighbouring authorities was not and is not yet certain. Nevertheless, the Bridgend LDP has been prepared in a manner that will ensure future cross boundary and regional alignment.

For one, regional methodologies have been utilised throughout development of the Replacement LDP evidence base to inform, for example, the Settlement Assessment and Candidate Site Assessment. This has ensured a consistent approach to evidence base development, helped to remove duplication and promoted the sharing of data and best practice across the region. As such, the local evidence base has been prepared to consider the wider regional context as far as possible, acknowledging that broader evidence base studies and policy approaches have not yet been developed and agreed.

The Replacement LDP has also been prepared following close dialogue with all neighbouring LPAs (Vale of Glamorgan, Neath Port Talbot and Rhondda Cynon Taf County Borough Councils) as well as other essential organisations. This dialogue has been conducted both on an individual and topic basis, but also through the South East Wales Strategic Planning Group and other topic-based forums. The Replacement LDP's Spatial Context Chapter references the adopted Plans of the neighbouring LPAs, which have all been considered throughout Plan preparation to ensure compatibility.

The main cross boundary issue with Rhondda Cynon Taf concerns the Llanillid Strategic Development Site in neighbouring Brynna, specifically regarding future education provision. However, the two Local Education Authorities are working collaboratively to address such matters and the Replacement LDP will not preclude a future solution.

The initial main cross boundary concern with the Vale of Glamorgan was regarding potential additional vehicular movements from the south of Bridgend into the Vale. However, the respective allocations have been designed to promote self-contained settlements, grounded in sustainable placemaking and active travel principles that enable fulfilment of the '20 minute neighbourhood' concept. On this basis, there were considered to be no fundamental issues with the Replacement LDP. A Statement of Common Ground has been signed with the Vale of Glamorgan (SD239) to this effect, which confirms both parties have worked in close collaboration throughout the different stages of the Replacement LDP preparation. This has included engagement meetings to discuss and review the different stages of the plan. Additionally, the Vale of Glamorgan Council did not raise any objections or concerns through the formal consultation process regarding the Replacement LDP and its supporting evidence base.

No particular cross boundary issues were highlighted by Neath Port Talbot County Borough Council. The Statement of Common Ground signed with Neath Port Talbot County Borough Council (SD102) confirms that both parties have worked in collaboration throughout the different stages of the Replacement LDP preparation and that the Council has no objections or concerns regarding the Replacement LDP and its supporting evidence base. Moreover, both parties agree that due to the different plan preparation timelines, it was not appropriate to prepare a joint formalised plan or evidence base.

11. How was the Settlement Hierarchy derived, and is it based on robust and credible evidence?

The Replacement LDP identifies and differentiates between the sustainability of places by defining a settlement hierarchy. This is informed by the conclusions of the Bridgend County Borough Settlement Assessment (2019, updated in 2021, SD91), which reflects Bridgend's historical and functional settlement pattern and seeks to achieve more sustainable places in a number of ways.

At Preferred Strategy Stage, Welsh Government commented, "The settlement hierarchy has been informed by a Settlement Assessment Paper, the methodology of which is detailed, sensitive and weighted towards sustainability criteria, in particular the proximity to and frequency of public transport at peak times, employment opportunities and services and facilities. The WG is broadly supportive of this approach".

The scale and type of growth apportioned to settlements is dependent upon their individual roles, functions and positions within the Settlement Hierarchy. This is to ensure the Replacement LDP directs the majority of growth towards areas that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided. The methodology is clear and rational, derived from a regional approach.

a) What is the purpose of the settlement hierarchy? will it guide new development to the most sustainable locations? and is it clear what types and amount of development, other than housing, will be appropriate in each tier of the hierarchy?

The purpose of the Settlement Hierarchy is to guide the appropriate level and type of growth to different settlements depending upon their individual roles, functions and positions. This is to ensure the Replacement LDP directs the majority of growth towards the most sustainable locations that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided.

A summary of the spatial distribution of housing is set out in Table 7 of the Written Statement (SD1), which identifies how the Plan's housing requirement figure is to be met through the full range of housing supply strands. The largest quantum of residential development (42% of the total) is directed towards Bridgend as the Primary Key Settlement and the primary focus for sustainable growth, which is classified as the only 'Tier 1' settlement. Proportionate growth is also proposed within the four 'Tier 2' Main Settlements of Maesteg (9%), Pencoed (11%), Porthcawl (13%) and the grouped settlement of Pyle, Kenfig Hill and North Cornelly (13%). The remaining growth is channelled towards 'Tier 3', which includes the Valleys Gateway and local settlements outside of Growth Areas. This is consistent with the Settlement Hierarchy

(informed by the Settlement Assessment Study (2019, revised 2021, SD91) and Spatial Strategy (refer to Background Paper 3: Spatial Strategy Options, SD36).

Table 6 of the Written Statement (SD1) illustrates the amount and proportion of housing supply compared to vacant employment land allocated in the LDP by area. This table quantifies the amount of 'B space' employment land that is planned for and therefore considered appropriate in each tier of the Settlement Hierarchy. The highest quantity of employment land (50.2ha; 70% of all total employment land) is within Bridgend (Tier 1), reflecting its status as a sub-regional settlement being a focus for commercial, service and employment development. The majority of the remaining employment land is allocated within the Tier 2 Settlements of Pencoed (6.4ha; 9% of the total), Maesteg (3.5ha; 5% of the total) and Pyle, Kenfig Hill and North Cornelly (4.83ha; 6% of the total). This reflects their status as Main Settlements within the hierarchy. While no 'B Space' employment land is allocated within the Tier 2 Settlement of Porthcawl, it is likely that the majority of employment in the town will continue to be provided through planned growth in the commercial, leisure and tourism sectors. Outside of the Growth Areas, the Valleys Gateway (Tier 3 Settlement) will be maintained as an important employment location (6.4ha; 9% of the total), which serves its hinterlands in addition to the Ogmore and Garw Valleys. However, transport capacity issues currently preclude additional significant development within this area at present (refer to SD41, Background Paper 8: M4 Junction 36). Collectively, 0.4ha (1%) of employment land is allocated within the Local Settlements (also Tier 3), recognising that local employment opportunities are important to sustainable and improve communities at a more modest level appropriate to their size, role and function.

The Settlement Hierarchy is also inter-related with the Retail Hierarchy as specified in SP12. New retail, commercial, leisure, education, health, community, public service facilities and appropriate employment developments (B1) will be focused according to the Retail Hierarchy, having regard to the nature, scale and location of the proposed development. Based on the findings of the Retail Study (2019, SD85) and Retail Study Update (2022, SD86), retail need is met through a combination of specific allocations and vacant space within commercial centres as identified within ENT6 and maximising Town Centre First principles. Bridgend is top of the Retail Hierarchy and is the only centre denoted as a Sub Regional Centre. It acts as the principal shopping centre for residents in the County Borough and for communities in neighbouring authorities, capitalising on its highly accessible bus and rail stations. Just under 2ha of retail and food and drink space is apportioned to Bridgend (Policy ENT6 refers). The Town Centres of Maesteg and Porthcawl are second in the Retail Hierarchy, followed by the District Centres of Pencoed, Pyle and Kenfig Hill, which are all collectively Tier 2 Settlements in the Settlement Hierarchy, and just under 1ha of retail space is collectively apportioned to Tier 2. See also Background Paper 6: Retail (SD39).

In summary, the Settlement Hierarchy has guided development to the most sustainable locations and provided clarity on the types and amount of development

appropriate within each tier, included housing, employment and retail uses. This will maximise opportunities for self-contained, sustainable forms of developments that are placemaking led and grounded in active travel principles.

b) What is the rationale for the proportions of development split across the tiers?

The largest proportion of development (42% of residential development, 70% of employment land and 64% of retail and food and drink space) has been assigned to Tier 1, which encompasses the Primary Key Settlement of Bridgend. This reflects the pre-eminent role of Bridgend as a highly accessible, major employment and retail centre that has a sub-regional sphere of influence. Over a third of population within the administrative area reside in one of the sub-areas of Bridgend, benefitting from the range of services and facilities on offer. These inter-related factors justify Bridgend as the Primary Key Settlement within the County Borough and it demonstrates the highest propensity to accommodate viable, sustainable placemaking-led development. The proportion of development assigned to Tier 1 reflects this fact.

The bulk of the remaining development is apportioned across Tier 2 of the hierarchy, including 20% of all employment land, 36% of retail space and residential development dispersed across the four Main Settlements of Porthcawl (13%), Maesteg (9%), Pencoed (11%) and the grouped settlement of Pyle, Kenfig Hill and North Cornelly (13%). The settlements within Tier 2 demonstrate a strong employment function with an existing concentration of businesses and a good variety of shopping and community services that meet the needs of each settlement and the surrounding area. The settlements are relatively well self-contained compared to other settlements across the County Borough and demonstrate a range of sustainable travel opportunities that connect with neighbouring areas, Bridgend and the wider region. These inter-related factors justify classification of these settlements as Main Settlements, and the proportion of development apportioned to Tier 2, which, along with Tier 1, can be maintained and progressed through future sustainable development.

The Valleys Gateway is the remaining and fifth Main Settlement, occupying a central location within the County Borough and forming an almost continuous urban area north of the M4 at the mouth of the Ogmore, Garw and Llynfi Valleys. This area comprises a number of inter-connected sub settlements, demonstrating high accessibility (including two railway stations and links to the M4), retail facilities and industrial estates. However, the Valleys Gateway has accommodated substantial new development over the life of the existing LDP and there are now capacity issues running north to south at junction 36 of the M4. This issue renders the settlement less suitable for significant sustainable development over the Replacement LDP period, hence it is located within Tier 3 of the Settlement Hierarchy along with the Local Settlements outside of Growth Areas. The Local Settlements perform a more limited

retail and community facility function, primarily serving their local residents. Whilst all services and facilities are important to their respective hinterlands, those on offer in these settlements draw from a smaller catchment area and are primarily confined to serving the more immediate population base. As such, the scope for Local Settlements to accommodate significant development is more limited, yet there are still opportunities to support smaller scale regeneration led growth to facilitate local economic development. Collectively, the proportion of development assigned to Tier 3 is lowest, with 12% of all residential development, 10% of all employment land and no specific retail allocations.

The development across each tier has been distributed to sustainable locations in accordance with the Settlement Hierarchy and Spatial Strategy. Due regard has been had to settlement accessibility, services, facilities, employment opportunities in the context of viable urban capacity in order to promote sustainable forms of growth and patterns of movement. Refer to the Settlement Assessment Study (2019, revised 2021, SD91) and Spatial Strategy (refer to Background Paper 3: Spatial Strategy Options, SD36).

c) Are the settlement boundaries drawn sufficiently widely to enable the predicted amount of growth?

Yes, the Council has completed a Settlement Boundary Review (SD92, 2022) as part of the Replacement LDP process, which effectively balances the need to deliver the growth and spatial strategy with conservation of the countryside. This Review built upon the Bridgend Settlement Assessment (SD 91, 2019, revised 2021) by utilising a combination of desktop review and site visits to consider appropriate boundary changes to allow for the delivery of the LDP strategy. This helped to identify the most appropriate locations to accommodate future development within the County Borough in order to achieve a sustainable pattern of growth, minimise unsustainable patterns of movement and support local services and facilities.

Alterations to the settlement boundaries of Bridgend, Pencoed, Pont Rhyd-y-cyff and Pyle, Kenfig Hill and North Cornelly were made to enable the proposed growth to take place. Alterations to the remaining settlement boundaries were not proposed as the settlements were deemed to accommodate enough capacity already or were not considered suitable to expand further while delivering sustainable placemaking-led outcomes. The Assessment and subsequent Review form a key part of the Replacement LDP evidence base.

The settlements detailed in SF1 will provide opportunities for development within their respective settlement boundaries. The Urban Capacity Study (SD97, 2022) has also analysed the potential urban capacity of the County Boroughs' settlements for housing growth along with the expected small and windfall site allowance rate. The Study identifies more than sufficient capacity within the proposed settlement boundaries to

accommodate this particular component of housing supply. It therefore demonstrates (in addition to past trends) that the small and windfall site allowance rate utilised in the Replacement LDP is both realistic and deliverable. It also serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP.

12. How was the Regeneration and Sustainable Growth Strategy defined? and is it based on robust and credible evidence?

The Regeneration and Growth Strategy was defined to build on the successes of the existing LDP strategy by continuing to promote brownfield regeneration while enabling sustainable growth in a manner that minimises delivery risks. The strategy therefore incorporates enough flexibility to fulfil regeneration priorities and deliver growth in areas demonstrating the highest propensity to accommodate it sustainably. This dual faceted strategy defines Regeneration Growth Areas and Sustainable Growth Areas to guide particular types of development to specific vicinities and ensure a managed approach to growth across the County Borough.

In the first instance, the Strategy prioritises the development of land within or on the periphery of sustainable urban areas, primarily on previously developed brownfield sites. It continues to focus on the delivery of the brownfield regeneration allocations identified in the existing LDP, hence, Porthcawl, Maesteg and the Llynfi Valley are still denoted as regeneration priorities through their designation as Regeneration Growth Areas. The ongoing commitment to brownfield development opportunities within these settlements accords with the site-search sequence outlined in PPW and seeks to minimise developmental pressure on BMV agricultural land (see SD48, Background Paper 15: The Best and Most Versatile Agricultural Land). However, given the existing LDP's success in delivering development on brownfield land in other settlements (notably Bridgend and the Valleys Gateway), there are limited further brownfield regeneration opportunities remaining. Additional viable and deliverable sites (including some greenfield sites) are therefore required to implement SP1, deliver affordable housing in high need areas and ensure the County Borough's future housing requirements can be realised.

The Strategy therefore also defines Sustainable Growth Areas, which constitute those settlements most conducive to logical expansion through delivery of under-utilised sites within their functional area and/or on their periphery. These Areas include Bridgend, Pencoed and Pyle, Kenfig Hill and North Cornelly; all defined as Main Settlements by the Settlement Assessment (SD91, 2019, revised 2021). The Sustainable Growth Areas have been identified based on their accessibility, availability of amenities and employment provision (range and quantity) in the context of their existing population bases and places in the settlement hierarchy. Growth is apportioned to these settlements based on these factors, their potential to contribute

to affordable housing delivery in areas of high need and their urban capacities to facilitate sustainable levels and patterns of development, recognising that accompanying infrastructure will also need to be and can be provided.

The scale and location of growth defined by the Strategy (SP1) has therefore been influenced by robust and credible evidence, including the findings of the LHMA (SD79), Plan-Wide Viability Assessment (SD81) and Settlement Assessment (SD91, 2019, revised 2021). The LHMA revealed significant shortfalls of affordable housing provision within Bridgend, Porthcawl, Pencoed, and Pyle, Kenfig Hill and North Cornelly. Moderate housing need was also identified in Maesteg and the Llynfi Valley, as was the need to diversify the dwelling stock within Valleys Settlements. This Strategy provides the optimal means to address these shortfalls in affordable housing provision, whilst helping to counterbalance the mismatch between supply and demand. Indeed, the Plan-Wide Viability Assessment and site-specific viability testing demonstrated that sites within these areas could support significant nil-grant affordable housing contributions (refer to Policy COM2). The Strategy is therefore considered most appropriate to maximise delivery of affordable housing in high-need areas as identified by the LHMA, whilst enabling sustainable forms of development that meet the Replacement LDP Objectives, minimise pressure on BMV agricultural land and provide scope to address existing infrastructure capacity issues. Background Paper 3: Spatial Strategy Options (SD36) justifies this Strategy through evaluating a range of spatial options, each of which have also been considered as a reasonable alternative and assessed further under the SA process (SD90).

13. How was the Regeneration Growth Area and the Sustainable Growth Area defined and are they based on robust and credible evidence?

In order to enable existing brownfield regeneration sites to come forward whilst facilitating supplementary growth on sustainable sites elsewhere, SP1 defines two respective types of Growth Area; Regeneration Growth Areas and Sustainable Growth Areas.

The Regeneration Growth Areas have been formulated based on the level of development that would be required to have a significant regenerative effect, the availability of brownfield sites for development in an area, existing settlement patterns, the socio-economic function and identity of settlements along with relevant environmental considerations. Regeneration-led growth will be explicitly directed to parts of the County Borough that will benefit the most and also those that exhibit opportunities to deliver the greatest positive impacts of such growth i.e. Porthcawl and Maesteg and the Llynfi Valley.

Equally, Sustainable Growth Areas constitute those settlements most conducive to logical expansion through delivery of under-utilised sites within their functional area

and/or on their periphery. The Sustainable Growth Areas have been identified based on their accessibility, availability of amenities and employment provision (range and quantity) in the context of their existing population bases and places in the settlement hierarchy. Growth is apportioned to these settlements based on these factors, their potential to contribute to affordable housing delivery in areas of high need and their urban capacities to facilitate sustainable levels and patterns of development, recognising that accompanying infrastructure will also need to be provided. These include the Main Settlements of Bridgend, Pencoed and Pyle, Kenfig Hill and North Cornelly.

These two distinct, yet mutually reinforcing types of Growth Area seek to direct the majority of inward investment, sustainable development and regeneration activities to the most appropriate places. They have been informed based on robust and credible evidence, including the findings of the LHMA (SD79), Plan-Wide Viability Assessment (SD81) and Settlement Assessment (SD91, 2019, revised 2021). A review of sustainability constraints and opportunities affecting the Regeneration Growth and Sustainable Growth Areas (and potential Strategic Sites therein) was also undertaken through the SA. This validated the broad suitability of these Growth Areas for such designation and is included within Appendix D to the SA Report (SD90).

The Sustainable Growth and Regeneration Areas include relatively unconstrained land, considered most appropriate to accommodate strategic scale development over the RLDP period without generating residual unacceptable significant adverse effects. This has been carefully considered through an assessment of environmental mitigation and supporting infrastructure requirements, informed by the SA (SD90) and scrutinised through the Candidate Site Assessment (SD64, 2022), Infrastructure Delivery Plan (SD77, 2022), and site-specific viability appraisals (SD82 and SD83).

14. Is the approach to site selection sufficiently clear and transparent, and is it founded on a robust and credible evidence?

Yes, the approach to site selection is clear, transparent and founded on robust and credible evidence, having been determined through the Candidate Site Assessment (CSA, SD64, 2022). This defines a clear methodology to assess each Candidate Site, together with other appropriate sites included as allocations in the existing Plan that have not specifically been considered by other mechanisms. The Assessment then provides a reasoned justification as to why sites are or are not proposed for allocation within the Replacement LDP. The CSA was undertaken in tandem with the SA, incorporating SEA (SD89), which has assessed the likely sustainability and significant environmental effects of all substantive components of the Plan (strategy, policies, site allocations, etc.) and any identified reasonable alternatives.

Stage 1 of the CSA process considered whether the site had the potential to support the Preferred Strategy. This incorporated sustainability criteria into the site assessment process, based on the 14 objectives developed for the SA. The SA

(incorporating the SEA) provides an evaluation / validation of the site selection process in respect of the overall contribution (or otherwise) to sustainable development. Following a base level assessment of all Candidate Sites, the SA excluded some sites for consideration based on significant environmental or deliverability criteria e.g., flood risk or common land. Stage 1 specifically addressed sites identified with major constraints that have been excluded from further consideration. This provided an opportunity for site promoters to provide further information to demonstrate that identified constraints could be satisfactorily overcome before any decision was made at Deposit Stage as to which Candidate Sites should be allocated.

Stage 2 of the CSA involved scrutinising the sites that progressed from Stage 1 in greater detail to determine their deliverability, sustainability and suitability. During Stage 2, sites were examined based on any specific issues they raised in terms of their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints, and opportunities. In addition, there was an assessment of the policy context, together with the local geographical context, including known infrastructure issues. Following completion of Stage 2, the Council obtained the views of a limited number of specific consultation bodies in respect of those sites considered suitable for future development and possible allocation in the Replacement LDP. As a result of this assessment, a range of sites were identified for inclusion within the Replacement LDP (Stage 4), acknowledging the conclusions drawn from Stage 2 and comments received from Stage 3.

a) Are the allocated sites based on a robust site assessment methodology that takes into account all potential constraints?

Yes, all allocations have been proposed based on the outcome of the Candidate Site Assessment (SD64, 2022), their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis.

Specifically, Stage 2 of the Candidate Site Assessment examined sites based on their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints and opportunities. In addition, there was an assessment of the policy context, together with the local geographical context, including known infrastructure issues. Site promoters were asked to prepare and submit a number of technical supporting studies to demonstrate the site's deliverability, sustainability and suitability, taking into account all potential constraints and demonstrating that they could be overcome. This enabled a detailed analysis of each site's deliverability and viability in the context of physical constraints, environmental impact, accessibility and infrastructure capacity. All sites proposed for allocation passed this robust assessment methodology and are supported by a detailed body of evidence that considers all potential constraints with appropriate mitigation.

Therefore, all candidate sites and potential rollover sites have been treated equally as potential 'reasonable alternatives' (subject to the absence of major constraints) before any proposals to allocate individual sites were made. This process identified major environmental or sustainability constraints, which, in the absence of further information being provided to demonstrate site effectiveness, was likely to result in the rejection of some candidate sites. This provided a fair opportunity for site promoters to provide further information to demonstrate that identified constraints and issues could be satisfactorily overcome before any decision was made as to which candidate sites should be proposed for allocation.

b) Have all infrastructure requirements been considered to ensure the timely deliverability of allocated sites?

Yes, the requirements for all necessary supporting infrastructure have been considered throughout plan preparation, assessed as part of each site's supporting technical evidence base and factored into the housing trajectory phasing analysis to ensure timely delivery of all allocated sites.

The Infrastructure Delivery Plan (IDP, SD77, 2022) provides a single schedule of all infrastructure necessary for the proposed allocated sites to proceed. All infrastructure measures identified within the Plan are required to either unlock the development or are necessary policy requirements to meet fundamental Replacement LDP objectives, particularly those relating to sustainability and placemaking.

The IDP forms an important part of the Replacement LDP evidence base providing a list of identified infrastructure required to support the delivery of the Replacement LDP. The IDP demonstrates how the Replacement LDP can deliver the necessary infrastructure, in the right place, by the appropriate body, at the appropriate time.

Additionally, the Plan contains an Implementation and Delivery Appendix (Appendix 5), which sets out the key issues, constraints, phasing and mitigation measures required to deliver proposals in the Replacement LDP. It comprises a brief description of the key sites, together with an overview of site-specific delivery and implementation issues, including site constraints, necessary mitigation/compensation measures and policy/s106 obligations/infrastructure requirements. This information has been factored into all site-specific viability work undertaken to support each proposed allocation, thereby ensuring upfront knowledge and transparency when sites are brought forward at the planning application stage. Monitoring indicators and triggers have been derived from this information accordingly.

15. Is it clear why the Strategic Development Sites were selected over other candidate sites? and is the Plan over reliant on the delivery of these sites?

Yes, identification of appropriate strategic sites has been undertaken in accordance with the Site Search Sequence and other requirements set out in PPW, as documented in supporting evidence to the Plan. This includes the Candidate Site Assessment (SD64, 2022), Background Paper 3: Spatial Strategy Options (SD36), Background Paper 4: Housing Trajectory (SD37) and Background Paper 15: The Best and Most Versatile Agricultural Land (SD48).

50% of the total housing provision within the plan is attributed to strategic sites, with the remainder comprising new smaller housing allocations, existing sites with planning permission, small windfall and large windfall sites. Therefore, the plan is not considered over reliant on strategic sites on this basis and there are a range of alternative housing supply components within and to balance the housing trajectory.

The quantum of development apportioned to strategic sites is closely linked with the need to facilitate delivery of new supporting infrastructure to accompany the proposed growth. The five strategic sites proposed for allocation will help create sustainable communities that will incorporate a mix of complementary uses, deliver improvements to existing infrastructure and provide new supporting infrastructure. This latter factor is particularly notable given the school capacity issues across the County Borough and the need for new sites to be significant enough in scale to support provision of a new primary school as a minimum. All proposed strategic sites have demonstrated they are capable of delivering new primary schools on-site; a feat that would prove unviable for smaller sites to deliver. Equally, and in response to the findings of the Strategic Transport Assessment, the strategic sites will make a significant contribution to the strategic highway network, with notable upgrades to Broadlands and Ewenny roundabouts to resolve transport capacity issues. This holistic approach would not be possible if several non-strategic sites were proposed for allocation instead. A strategy more reliant on smaller sites could risk exacerbating localised infrastructure problems and impacting negatively on local communities without any viable means of resolution.

All strategic sites key to the delivery of the Replacement LDP have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs. This has provided a high degree of confidence that the sites proposed are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. While 50% of the Replacement LDP's housing provision is attributable to strategic sites, their evident deliverability and contribution to supporting infrastructure is considered to override any concerns regarding 'over reliance'.

Moreover, an appropriate flexibility allowance (10%) has been embedded into the Replacement LDP and the basis for which is set out in Background Paper 4: Housing Trajectory (SD37). The flexibility allowance recognises the fact that there may be certain specific circumstances, unknown at the plan making stage, that delay the delivery of sites, notwithstanding the robust frontloading of site delivery evidence. This

allowance has been chosen specifically to enable the Replacement LDP's housing requirement to remain deliverable in the event that strategic sites fail to come forward as anticipated at this point of plan preparation. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within Background Paper 4: Housing Trajectory (SD37), there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the latest Stakeholder Group Meeting.

In summary, it is clear why the Strategic Development Sites have been selected over other candidate sites and the approach is considered preferable to placing non-more reliance on a mix of smaller sites. Several sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infrastructure problems and it can be more difficult for such sites to provide their own supporting infrastructure until they reach sufficient critical mass. As noted in the Plan-Wide Viability Assessment (2021), sites of several hundred units can pose their own viability issues for this very reason. Therefore, the Replacement LDP has only proposed several smaller site allocations where capacity was clearly demonstrated to accommodate the respective level of growth within the settlement and/or necessary facilities and infrastructure improvements could be provided in support of the development. **Moreover, only 50% of the total housing provision comprises sites of a strategic scale and therefore the plan is not considered over-reliant on Strategic Development Sites on this basis.** The final selection of proposed allocations, and accompanying justification, is provided in the Candidate Site Assessment (2022, SD64).

16. How will the Plan apply the principles of sustainable placemaking?

The Replacement LDP is framed around using placemaking to achieve economic and spatial outcomes in tandem, enabled in the first instance through the sustainable distribution of new development. As outlined within Background Paper 3: Spatial Strategy Options (SD36), the Preferred Strategy is considered most conducive to delivering growth through sustainable patterns of development that accord with the principles of sustainable placemaking.

Background Paper 23: RLDP Conformity with the National Sustainable Placemaking Outcomes (SD55) has demonstrated the Replacement LDP is in general conformity and supports delivery of the National Sustainable Placemaking Outcomes, providing a sound framework for placemaking-led sustainable development in the County Borough.

The Council is equally committed to the Placemaking Wales Charter and the development of high-quality places for the benefit of communities. These principles have both informed and are embedded within the Replacement LDP. Policy SP3

includes two overarching criteria to ensure the principles of Good Design and Sustainable Placemaking are enshrined within all development proposals across the County Borough, enabled through application of 14 more detailed criteria. This Policy represents the starting point for the assessment of all planning applications which are received by the LPA. Each of the criterion relate to detailed issues which are addressed further in other Strategic and Development Management Policies. All future development proposals will be assessed to ensure that they will make a positive contribution towards strengthening local identity, achieving sustainable communities, encouraging a more sustainable way of living, and promoting community cohesion. SP3 also seeks to ensure that the viability and amenity of neighbouring uses and their users/occupiers is not compromised by new development. This Policy seeks to promote connectivity for all by maximising opportunities for active travel. Well connected developments will assist in promoting the improvement of health and well-being by encouraging people to adopt healthier and active lifestyles, whilst also contributing to the creation of successful places. A green infrastructure network also provides important amenity value in addition to health and well-being benefits. The Replacement LDP will therefore seek to integrate both active travel routes and green infrastructure networks, where appropriate, to incite creation of high quality environments that encourage active lifestyles. The design and functionality of streets is considered a fundamental aspect in achieving sustainable placemaking to this end. A sense of place is recognised in the policy protecting the historic and cultural heritage assets in the County Borough.

The proposed allocations also accord with the principles of the 20-Minute Neighbourhood (refer to Background Paper 19, SD51), which seeks to provide people the ability to access key services and facilities within a 20-minute walk or cycle ride from home, with safe cycling and local transport options. The Replacement LDP aims to reduce private car reliance and help the County Borough achieve the principles set out by the Active Travel (Wales) Act 2013 to further support sustainable placemaking. As part of this process, Active Travel Network Maps have been produced to identify the walking and cycling routes required to create fully integrated networks for walking and cycling to access work, education, services and facilities.

In summary, sustainable placemaking has both intrinsically informed development and is fundamental to the successful delivery of the Replacement LDP. Implementation of Future Wales' strategic placemaking approach, and its principles, will ensure development contributes positively towards building sustainable places that support active and healthy lifestyles, with urban neighbourhoods that are compact and walkable, organised around mixed-use centres and public transport, and integrated with green infrastructure.

17. Will the requirements of the Flood and Water Management Act 2010, in respect of sustainable drainage systems have an impact on the development capacity, viability and/ or deliverability of allocated sites?

The Council is committed to implementing sustainable approaches to surface water drainage and expects development to incorporate SuDS wherever possible. Planning conditions and obligations will be used to ensure SuDS implementation, including phasing requirements, long term maintenance and the provision of off-site drainage. In order to provide effective drainage in the long term, developers will need to plan for the future maintenance of SuDS and water courses associated with the development. This will be secured through Section 106 Agreements.

The impact SuDS will have on the development capacity, viability and deliverability of allocated sites was considered from the outset of plan preparation. This was a key topic of discussion with the Viability Stakeholder Group as part of the formulation of the Plan-Wide Viability Assessment (SD81, 2021). The potential impact of SuDS in relation to site densities, capacities and costs (both delivery and adoption) was duly considered as part of the process and informed by discussions with the Stakeholder Group and the Council's Land Drainage Team. It was concluded that the costs for adopting SuDS and the space to incorporate SuDS both vary widely depending on the type of system utilised, although appropriate allowances were agreed and factored into plan-wide viability testing from the outset.

More detailed site-specific viability assessments were also undertaken in relation to the proposed site allocations within the Replacement LDP. The on-site provision of SuDS was considered as part of each site's masterplan and proofing layout, thereby clearly ensuring development densities and unit numbers have taken such systems into account. The costs for adoption of SuDS have also been accounted for within site-specific viability appraisals undertaken to demonstrate deliverability of each allocation (refer to SD82, Potential Strategic Sites Independent Financial Viability Appraisals Report (2021) and SD83, Updated Financial Viability Appraisals Addendum – Strategic Sites (2022)).

All new proposed allocations are considered to demonstrate delivery in accordance with the Development Plans Manual and have been subject to significant proportionate evidence requirements to support their delivery. This includes schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, Section 106 requirements, infrastructure and costs. The requirements of the Flood and Water Management Act 2010, in respect of SuDS have been duly considered as part of this process to ensure they will have no adverse impact on the development capacity, viability and/ or deliverability of allocated sites.

18. How will the Plan seek to mitigate the impact of climate change?

Replacement LDP Specific Objective 3J seeks to: 'Promote developments that are well located and designed to assist in meeting energy demand with renewable and low carbon sources in accordance with the energy hierarchy for planning' (set out in PPW), including delivery of net zero carbon homes in the first instance, thereby helping to both mitigate the causes of climate change and tackle the 'climate emergency' declared by Welsh Government and the Council'.

In order to achieve this, the Replacement LDP seeks to put in place resource efficient and climate change resilient settlement patterns that minimise land take and urban sprawl. Put simply, this means locating development in settlements which are accessible to a range of services and facilities whereby people can reduce private car usage and thereby reduce the harmful effects of carbon emissions (refer to SD51, Background Paper 19: 20-Minute Neighbourhood). Policy SP4 facilitates this by specifying criteria that require development to both mitigate and adapt to climate change, thereby minimising its underlying causes and planning for its consequences. Policy SP4 also seeks to encourage renewable and low/zero carbon energy generation technology, subject to a range of material planning considerations. Such policy approaches can also help ensure that new development is designed to be resilient to future climate change effects and enable the Plan to conform with national policy such as the NDF and PPW. This framework has both been informed by and will allow the County Borough to meet ambitious renewable energy targets based on the Renewable Energy Assessment (SD84, 2020), whilst ensuring that development is sited appropriately in areas deemed suitable to accommodate such provision.

SP4 also recognises the risk of flooding as a key effect of climate change. The Policy seeks to steer highly vulnerable development away from flood risk areas, to assess the implications of development in areas at risk of flooding and to ensure that new development does not increase the risk of flooding elsewhere. The new Flood Map for Planning accompanying TAN 15 includes climate change information to show how this will affect flood risk extents over the next century, along with the potential extent of flooding assuming no defences are in place. The Flood Map for Planning has been supplemented by an updated Strategic Flood Consequences Assessment for Bridgend County Borough (SD63, 2022), which provides information on all sources of flooding to provide decision support guidance when seeking an appropriate location for development. This information has influenced the siting and type of development allocations within the Replacement LDP and all proposed sites have been assessed against known flood risk datasets to provide a preliminary assessment of flood risk with the aim of directing development away from high flood risk areas. This evidence has enabled application of the Justification and Acceptability Tests of TAN15 to help assess the location, type and scale of development and demonstrate a risk-based approach has been applied. This evidence has also informed policies on flood risk whereby subsequent development proposals can be assessed. Policy DNP8 requires all development in flood risk areas to be supported by a Flood Consequences/Risk

Assessment and incorporate any mitigation measures required to avoid or manage increased flood risk. A new SPG will also be prepared to set the framework for a local approach to flood risk management within Bridgend Town Centre.

Additionally, the Replacement LDP is based upon the principles of the 20-Minute Neighbourhood, with a focus on transit-orientated development which seeks to ensure that sites allocated within the plan maximise opportunities for active travel, placemaking and sustainable transport choices (refer to Background Paper 19: 20-Minute Neighbourhood, SD51).

19. How will the plan address the issues of the Welsh language?

One important element of sustainable Placemaking involves taking steps to safeguard and grow the use of the Welsh Language. The SA Framework includes a key strategic objective relating to the conservation, protection and enhancement of cultural heritage, including use of the Welsh language, which has informed development of related policies within the Replacement LDP.

Local level data does not identify any particular settlement with a notable concentration of Welsh speakers and therefore a specific Welsh language policy is not deemed necessary. However, consideration of and appropriate provision for facilitates to support the Welsh Language has been factored into different thematic policies relating to tourism (SP16), conservation (SP17) and social and community infrastructure (SP9). This integrated approach is considered most appropriate to support the Welsh Language through a cross-cutting policy approach, thereby ensuring the Welsh Language is an intrinsic element of the sustainable placemaking agenda at the heart of the Replacement LDP. This is encapsulated in Policy SP2 that seeks the creation of high quality, attractive, sustainable places that support active and healthy lives and ensures that new development positively contributes towards this. Additionally, each Strategic Site proposed for allocation includes provision of a new primary school as a minimum, providing the option for future provision of Welsh-medium schools subject to the Local Education Authority's requirements at the time.

Policy SP10 also reflects the findings of the SA and specifically references the need for development proposals to consider and include appropriate provision for the Welsh Language. In principle, the policy will help to safeguard and increase the use of the Welsh Language within the County Borough.

20. Will the Plan be supported by Supplementary Planning Guidance? and what will be the status of Place Plans and how will they relate to the LDP?

The Replacement LDP will be supported by Supplementary Planning Guidance (SPG). Two SPGs have been published during Replacement LDP preparation (Education Facilities and Residential Development and Outdoor Recreation Facilities and New

Housing Development) and will be updated as necessary post adoption of the Replacement LDP. These will be supplemented by additional SPGs, which will be prepared within the first two years of Replacement LDP adoption, to cover the following thematic policy areas:

- Affordable Housing - to expand upon the Council's planning policy on affordable housing and outline how the Council will expect affordable housing to be delivered as part of new residential developments within the County Borough. It will also further clarify the approach to providing affordable housing on exception sites in limited circumstances.
- Biodiversity and New Development – to clarify how development should minimise impacts on biodiversity and provide biodiversity enhancement (net benefit), where possible, whilst protecting or enhancing green infrastructure provision in recognition of its wide-ranging benefits.
- Design Guide – to provide a clear statement of what the local planning authority expects within the County Borough, both in terms of how design information should be presented, but also how design issues should be addressed to enhance clarity at the planning application stage.
- Design of New Schools – to provide additional guidance in relation to the development of new school sites, considering connectivity, adjoining land uses and active travel opportunities, thereby enabling delivery of the School Modernisation Programme (Band C).
- Development in the Countryside – to clarify the types and scale of development that will be considered acceptable in countryside locations.
- Employment Land – to expand upon the Council's planning policy, which deals with the protection of identified employment sites for their employment function and circumstances where alternative uses may be acceptable.
- Flood Risk – to provide additional guidance into how certain sites can be developed in compliance with the requirements of the future revised TAN15.
- Green Infrastructure – to support the delivery of, safeguard and enhance biodiversity and integrated multi-functional green infrastructure networks.
- Health and Wellbeing – to ensure planning decisions contribute to the national and local Well-being Goals set out in the Well-being of Future Generations (Wales) Act 2015. This SPG will offer guidance for addressing the effect of the built and natural environment on health and well-being as part of a strategic approach to tackling local health inequalities and promoting healthy lifestyle options. It will also provide guidance on appropriate locations for primary health care facilities.

- Masterplans for Long Term Regeneration Sites - to provide detailed strategies to enable the delivery of Long-Term Regeneration Sites within the Plan (Coegnant Reclamation Site (COM1 (R1)), the Former Cooper Standard Site, Ewenny Road (COM1 (R2)) and Maesteg Washery (COM1 (R3))).
- Parking Standards - to expand upon the Council's requirements in relation to parking provision for all forms of development balanced against the availability of active travel opportunities and community facilities. It will also assist in the preparation and submission of planning applications and achieve a common approach to the provision of parking facilities associated with new development and change of use.
- Planning Obligations – to set out the Council's approach to planning obligations when considering applications, providing further guidance on how the policies set out in the Replacement LDP are to be implemented. This SPG will help to ensure that developments contribute toward the provision of necessary infrastructure and measures required to mitigate their impact.
- Renewable Energy and Decarbonisation – to provide advice and further guidance to help ensure that new development is designed to be resilient to future climate change effects, by encouraging use of renewable and low/zero carbon energy generation technology.
- Southern Bridgend Gateway – to enable further consolidation and enhancement of Bridgend's role as a major focus for employment and new inward investment by promoting strategic employment sites at Brocastle Estate, the former Ford Site and Parc Afon Ewenni. The SPG will clarify the role and land uses that can be enabled at these sites to allow for sustainable, placemaking-led developmental synergy.
- Sustainable Construction and Design – to provide advice and further guidance to help ensure that new development is designed to be resilient to future climate change effects, having regard to broader principles of sustainable design in order to significantly reduce energy usage and carbon emissions.
- Trees and Development – to clarify the Council's expectations regarding tree planting and new development, to offer advice on maintaining existing trees and planting new trees, on and adjacent to development sites.

In terms of Place Plans, the Sustainable Housing Strategy equally recognises the role that Place Plans can have in assisting with identifying small, local development sites that reflect local distinctiveness, address local, specific community scale issues and promote self and custom build opportunities. Place Plans are to cover a community area and their preparation should ideally, although not exclusively, be led by Town and Community Councils and/or related steering groups. This will allow local groups to take the initiative and help promote (i.e., via development briefs) small, locally

distinctive developments at a scale commensurate with the respective settlement and in accordance with the Replacement LDP.