



Geraint John Planning

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Representor ID: 1165

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By Email: ldp@bridgend.gov.uk ; LDPProgrammeOfficer@bridgend.gov.uk

C/O Amanda Borge
LDP Programme Officer
Bridgend County Borough Council
Civic Offices
Angel Street
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Dear Sir / Madam,

BRIDGEND COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN EXAMINATION

RESPONSE TO MATTERS AND ISSUES – MATTER 1: OPENING, PLAN PREPARATION AND LDP STRATEGIC FRAMEWORK

Please find enclosed, on behalf of, and under instruction from the landowner and promoting party Caradog Ltd., submissions to the Examination of the Local Development Plan (LDP) in relation to Land off Penprysg Road, Pencoed (Site Ref. 87.C1).

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 1: Opening, Plan Preparation and LDP Strategic Framework.

We look forward to attending the Hearing Session in respect of Matter 1 in due course. In the meantime, we hope and trust that all is in order with the submission. Please do not hesitate to contact us in the event that further information is considered beneficial.

Yours sincerely,

Geraint John
Director
Geraint John Planning Ltd

PREFACE

This submission relates to the matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 1: Opening, Plan Preparation and LDP Strategic Framework.

Each of the relevant issues raised in relation to the above matters are considered in detail below.

It should be noted that these submissions do not respond to every question raised within the Inspector's Agenda, as not all of these questions necessitate a response by us, and/or earlier submissions made on behalf of Caradog Ltd (Representor ID. 1165) are considered sufficient to address the matters raised. Accordingly, these representations only provide responses to questions where it is considered necessary and relevant to do so.

QUESTIONS

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?**
- b. The Well-being of Future Generations Act (Wales) (2015)? And**
- c. The Equality Act (2010)?**

The Representor agrees that the LDP has been prepared in accordance with the requirements of the documents and papers referenced above.

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 LDP has been informed by a suite of impact assessments, including a Sustainability Appraisal (2021) incorporating Strategic Environmental Assessment, undertaken by Stantec. This assesses and outlines the likely significant environmental and wider sustainability effects of the Plan, and also identifies the reasonable alternatives. The Sustainability Appraisal has been through a number of stages and reporting i.e. Sustainability Appraisal Scoping Report (2018), and Interim Sustainability Scoping Report (2019) to inform the LDP as submitted, through the incorporation of amendments

The Sustainability Appraisal concludes that *"the final version of the Deposit Plan is now predicted to generate a range of likely significant beneficial effects on the environment and in relation to identified key sustainability issues, with no residual significant adverse effects considered likely."*

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

It is considered that the Plan has been prepared consistently and in accordance with Future Wales: the National Development Framework (NDF), which considers the issues significant to Wales's prosperity and well-being, such as the economy, housing, transport, energy and the environment. BCBC have undertaken an assessment of the LDP to demonstrate conformity with the NDF (Background Paper 17: National Development Framework (NDF) Conformity Assessment). The report conclusions outline the following: *"This assessment has demonstrated the RLDP is in general*

conformity with and supports the delivery of the NDF, thereby providing a sound framework for enabling sustainable development in the County Borough."

Moreover, the Welsh Government, within their representations on the Deposit Plan, consider that *"Bridgend's Replacement Local Development Plan (2018-2033) is in general conformity with the National Development Framework."*

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?

It is the Representors position that the Plan has duly considered the seven well-being goals (a prosperous Wales, a resilient Wales, a healthier Wales, a more equal Wales, a Wales of cohesive communities, a Wales of vibrant culture and thriving Welsh Language and a globally responsible Wales) and five ways of working (long-term, integration, involvement, collaboration, and prevention).

The 4 Strategic Objectives (SOBJ1, SOBJ2, SOBJ3, SOBJ4) within the LDP have been defined to cross-reference the goals and objectives of the Well-Being of Future Generations Act, and will serve to deliver the overarching vision through the strategic policies. Each strategic policy closely links with and references the pertinent goals of the Well-Being and Future Generations Act, and has been based on an on up-to-date and robust evidence base. It is therefore considered that the Well-being of Future Generation goals and objectives have been appropriately referenced within the Plan.

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?

It is not considered that there have been any significant changes in national policy or local circumstances since the LDP was placed on Deposit that could have adverse implications.

It is acknowledged that there has been a change in relation to flood risk and the forthcoming new TAN15 and associated New Flood Map for Planning. However, Land off Penprysg Road, Pencoed Site Ref. (87.C1) is not to any extent affected by flood risk, with regards to either the Development Advice Map or the latest publication of the New Flood Map for Planning (November 2022).

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 Representor agrees that the Plan's Vision is sufficiently aspirational and locally specific.

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

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

The Growth and Spatial strategy provides the framework to help realise the regeneration priorities of the Council, whilst also apportioning sustainable growth towards existing settlements that benefit from existing services, facilities and employment opportunities. The Growth and Spatial Strategy has informed and resulted in the formulation of LDP Policy SP1 (Regeneration and Sustainable Growth Strategy), which has been informed by a wide evidence base – as identified within the policy text.

This has included, but is not limited to, economic, demographic, housing market, viability, settlement, and Agricultural Land data and evidence.

Insofar as the proposed level of growth, this has been derived from Office of National Statistics data, and based on a 2019 Mid Year Estimate base year, with migration assumptions from a 6-year period (2013/14-2018/19). This period, which was pre-Covid 19, saw a high level of population growth within the County Borough, which can be reasonably expected to continue.

The resultant spatial strategy directs development to the most sustainable location, in accordance with the Settlement Hierarchy.

Both the growth and spatial strategy are supported in principle by the Welsh Government in their representations to the Deposit Plan (2021).

Given all the above, the Representor is of the opinion that the Growth and Spatial Strategy has been based on robust evidence.

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 Deposit Plan has identified the key settlements in the County, as defined in Policy SP1 'Settlement Hierarchy and Urban Management', and these are considered to all be relatively self-contained, in that they demonstrate a strong employment function with an existing concentration of businesses plus a variety of services.

Moreover, these settlements contain facilities that meet the needs of local populations and those of wider surrounding environments, which is further bolstered by a range of sustainable travel opportunities that connect to neighbouring areas.

Site Ref. (87.C1) is situated in Pencoed, which is recognised as a Main Settlement in the hierarchy, with important retail, community service and employment provision. The Deposit Plan acknowledges that Pencoed will continue to capitalise on the growth and opportunities identified within nearby Bridgend, particularly in terms of access to jobs and high level services.

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

It is noted that the latest update to TAN 15 and the New Flood Map for Planning was in November 2022, following the submission of the Plan for examination. As aforementioned, Land of Penprysg Road, Pencoed Site Ref. (87.C1) – is not to any extent affected by flood risk, with regards to either the Development Advice Map or the latest New Flood Map for Planning.

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

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 settlement hierarchy, as set out under Policy SF1 (Settlement Hierarchy and Urban Management), identifies the Primary Key Settlement, Main Settlements, and Local Settlements within Bridgend. This has been informed by, and has regard to, the BCBC Settlement Assessment (2019, revised 2021),

which analyses the components of existing settlements, their functional relationships with each other plus their current and potential future roles. The resultant settlement hierarchy identifies the most appropriate locations to accommodate future development in order to achieve a sustainable pattern of growth.

It is noted that the Welsh Government, at the Preferred Strategy stage, commented that they were "*broadly supportive of this approach.*" Moreover, the LDP spatial strategy is supported in principle by the Welsh Government in their representations to the Deposit Plan (2021). Specifically, it is stated that "*The Welsh Government has no fundamental concerns on the spatial distribution of housing and employment growth...*".

In light of this, it is considered that the Settlement hierarchy has been based on robust and credible evidence, which is reflective of the approach taken nationally.

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

The strategic allocations have been directed towards the 'Primary Key' and 'Main' Settlements. As a result, there is capacity within the 'Local' settlements, including Pontrhydydyff, Llangynwys and Cwmfelin, to accommodate smaller, albeit important, levels of growth to sustain and facilitate local economic development. Importantly, the split across settlements ensures that opportunities to allocate and direct new growth is proportionate across the County, to ensure that local identified needs are met, and that the key objectives of the Plan are addressed.

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?

With regards to housing allocation Site Ref. (87.C1) – the masterplans submitted to BCBC through the candidate site process demonstrates that the site can suitably accommodate SuDS as part of a surface water drainage strategy, without impacting upon development capacity. This therefore confirms that there is no impact from drainage requirements on viability and / or deliverability for this site.