

Replacement Bridgend Local Development Plan Examination Statement



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POSITION	Associate Director
REPRESENTOR REFERENCE	391
SUBJECT	Hearing Session 1: Plan Preparation and LDP Strategic Framework
CLIENT	Llanmoor Development Co. Ltd (Land at City Farm, Bettws)
DATE	13 February 2023

1. INTRODUCTION

This Statement has been prepared on behalf of our Client Llanmoor Development Co. Ltd to provide further comments in respect of some of the Matters for discussion at Hearing Session 1: Plan Preparation and LDP Strategic Framework.

As requested, we do not intend to add to our comments already made and will rely on the Inspector taking those views and comments into account as part of their consideration of the Plan; specifically our comments within the following submissions:

- Preferred Strategy – dated 8th November 2019
- Deposit RLDP Stage – dated 27 July 2021

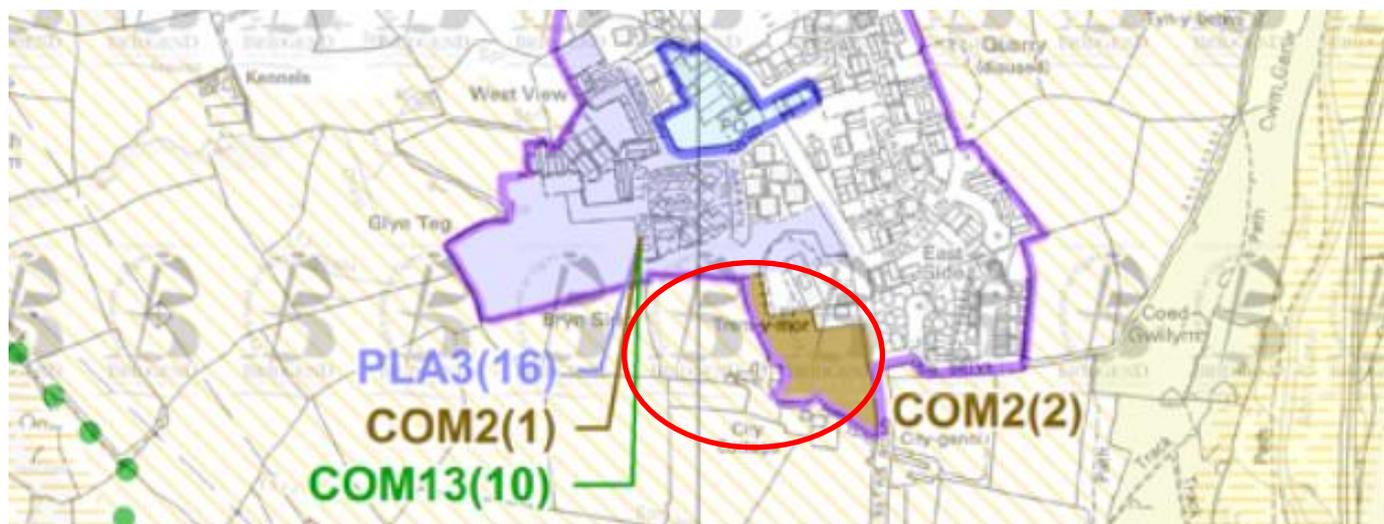
We would, however, seek to supplement our comments in respect of Bettws' position within the Settlement Hierarchy and the position of the boundary; dealing addressing Question 11 – *'How was the Settlement Hierarchy derived, and is it based on robust and credible evidence?'* and specifically sub-question C relating to the settlement boundaries. Much of the information provided has been submitted to the Council as part of the live planning application for development on Land at City Farm, Bettws – ref. P/22/164/HYB.

2. QUESTION 11 – SETTLEMENT HIERARCHY AND SETTLEMENT BOUNDARIES

Bettws is identified within the BRLDP under Policy SF1 – Settlement Hierarchy and Urban Management as a 'Local Settlement' where no formal allocations or changes to the settlement boundaries are proposed. Windfall development in each settlement would be dealt with on a case by case basis and in line with the relevant Plan policies.

The settlement has seen very limited growth over the years despite sites being allocated for development and planning permissions granted for housing but never implemented. Llanmoor Development Co. Ltd consider that the settlement is calling out for new housing, both market and affordable. There is support for the delivery of market housing in particular in the area, from both local people who wish to stay in the village but are unable to do so as there is no new housing available, and politically where local representatives recognise the need for the delivery of new housing. Llanmoor are in a position to move quickly to implement any planning permission granted to deliver for the people of Bettws.

At the southern extent of the settlement, the boundary follows an arbitrary line which does not seem to follow a clear and logical boundary e.g. hedge line or road. It is solely drawn to follow the boundary of the historic planning permissions for the site which then informed allocation ref. COM2(2) for 40 dwellings within the original LDP. The boundary illogically splits a former agricultural field in half – see below. Details of the background to this have been set out in previous submissions.



As we have further set out in previous submissions, there is a live planning application submitted by Llanmoor for 40 dwellings on land within this allocation and the immediately adjoining land; comprising the other ‘half’ of the field up to its logical and clear boundary.

At present, concerns have been raised by the LPA in respect of the current planning application due to its location partly within and partly outside the settlement boundary; and therefore being ‘unjustified’ development in the countryside.

We understand that the land to the north, which has also been the subject of a longstanding undeveloped allocation for housing, regeneration and green space, is about to go live with a PAC consultation for a housing led development. Whilst proposals have yet to be made public (we understand that they may be available at the time of the Hearing Session), the site is now being brought forward by the Owners (BCBC and Valleys to Coast). Accordingly, to ensure that a logical, well planned and integrated minor extension to the settlement (which does not propose any more housing than is currently allocated) it is considered that adjustments to the extent of the settlement boundary should be made – as shown by the red dotted line below:



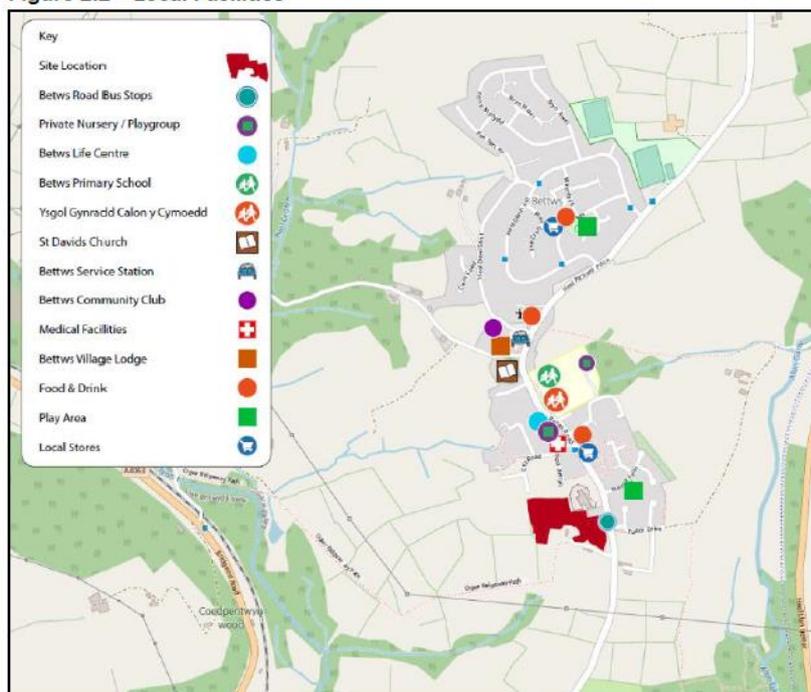
Such an adjustment would result in a logical, defensible and clear boundary for the settlement in this location, rather than an arbitrary line based on a historic planning permission.

Bettws is a sustainable settlement with a number of local services that cater for its residents' day-to-day needs. The below extracts from the Transport Statement for Llanmoor's application at City Farm demonstrates the extent of these services and facilities (and their proximity to the site).

Table 2.2 – Summary of Local Facilities

Local Facility	Distance from site (metres)	Walking time (minutes)	Cycling time (minutes)
Public Transport			
Bettws Road Bus Stops	20	1	<1
Town Rider Bus Service (door to door)	-	-	-
Community Services			
Bettws Life Centre, including: - Library - Meeting Rooms - Café - Office Space for Hire - Free Wifi - Three Fitness Classes per week	400	5	2
St Davids Church	600	7	3
Bettws Service Station	700	9	3
Bettws Community Club	750	9	4
Village Lodge	550	7	2
Cwm Garw Doctors Practice	280	3	1
Play Area (opposite Y Wern)	1100	14	5
Play Area (off Heol Bradford)	350	4	2
Education			
Fast Track Childcare Solutions (Nursery)	300	4	2
Bettws Primary School	450	6	2
Ysgol Gynradd Calon y Cymoedd	450	6	2
Local Stores			
Premier Bettws Stores, including: - ATM - Post Office - Paypoint / Payzone	260	3	1
Kumar Stores - Family Shopper	1100	14	5
Londis Store	1100	14	5
Food & Drink			
Pub – The Oddfellows Arms	700	9	3
Bettws Fish Bar	1100	14	5
Chinese / English Takeaway	1100	14	5
Pizza Choice	260	3	1

Figure 2.2 – Local Facilities



It is noteworthy that all of these services and facilities are accessible by non-motorised modes of travel and are served by good quality pedestrian and cycling routes, some of which are away from main roads and traffic. The planning application proposes to enhance these routes and connections from this southern end of Bettws into the heart of the village – thereby enhancing its attractiveness for both existing and potential new residents. The development of the land to the north would also provide clear opportunities for a walking route away from the main road given Llanmoor’s proposal would seek to connect into that development.

Moving within and between places is a key theme within PPW11. With regards to sustainable transport, it advises facilitating developments which:

- Are sited where they can be easily accessed by sustainable modes of travel and without the need for a car;
- Are designed to integrate with existing land uses and neighbourhoods; and
- Make it possible for all short journeys within and beyond the development to be easily made by walking and cycling. [emphasis added]

PPW11 expands on this and recognises the differences between development in different areas and the need to consider local context, with paragraph 4.1.17 stating *“Different approaches to sustainable transport will be required in different parts of Wales, particularly in rural areas, and new development will need to reflect local circumstances.”*

PPW11 also states in paragraph 3.39 that *“For most rural areas the opportunities for reducing car use and increasing walking, cycling and use of public transport are more limited than in urban areas. In rural areas most new development should be located in settlements which have relatively good accessibility by non-car modes when compared to the rural area as a whole.”* Development should *“where possible, offer good active travel connections to the centres of settlements to reduce the need to travel by car for local journeys.”*

Accordingly, whilst some connections beyond the settlement are slightly more difficult in terms of active travel (although active travel routes do exist – see previous submissions made on this point (letter dated 27 July 2021)), it is

clear that the settlement itself is well-catered for with local services, and a holistic and considered extension to the settlement would only bring further investment into such infrastructure.

It is noteworthy that many comments made by others in respect of Bettws as part of the RLDP process centre around the limited or lack of bus services. Our investigations have identified that the settlement benefits from a very reasonable service which would allow a resident to attend a place of work or service beyond the village. In total there are approximately 2 buses per hour which serve the Bettws Road stops on a weekday.

The approximate bus journey time to Bridgend town centre is 20 minutes. This is comparable to car journey times to the same destination.

In addition, Bridgend Community Transport provides a 'Town Rider' service, serving Bridgend and the surrounding areas. 'Town Rider' is an affordable demand responsive Community Bus service serving Bridgend town wards operated by Bridgend Community Transport – a local not for profit community transport charity. Concessionary pass holders may travel free of charge on the scheme, and it is also wheelchair accessible.

'Town Rider' is primarily targeted at people who find it difficult to use mainstream bus services and is available to residents within designated areas of Bridgend including Bettws. Drivers are on hand to help passengers board and alight vehicles. 'Town Rider' operates on a door to door basis. The service is subject to availability and guideline timetables which will vary according to the demand for travel and requested destinations on any given day.

Passengers may use the service to access local essential services such as grocery shops, supermarkets, health and well-being services, or retail locations such as McArthur Glen. Unlike other community transport services or taxis, passengers booking the service will not have exclusive use of the bus and will likely be sharing the vehicle with other pre-booked passengers who are travelling to the same or nearby destinations.

3. CONCLUSION

Bettws has been a longstanding target for regeneration within the current adopted LDP. Despite planning permission having been granted for part of the site being promoted by Llanmoor, the site has never been brought forward. Having now undertaken significant assessment and survey work on the allocated site, it is our view that the site was simply unable to accommodate the 40 dwellings it had previously been allocated for.

Bettws itself has, however, seen significant investment in the form of two new primary schools during the current plan period, along with small numbers of self-build housing and private commercial developments, all of which have been a benefit to the settlement; despite this there is still significantly more potential.

Llanmoor purchased the land at City Farm from the previous owners in 2019. A key reason for the purchase of the site by Llanmoor was that they saw the potential it offered in terms of the demand and desire for new housing from the local market, and the relationship and potential connections with the regeneration land to the north. Llanmoor do not see the investment in this particular site as an isolated one, they see the potential to work with BCBC and Valleys to Coast to deliver a scheme which would benefit the settlement as a whole and capitalise on its synergy with the regeneration site to the north.

There is therefore a clear case to support the adjustment to the settlement boundary to provide a clear and logical boundary to the settlement which would result in significant regeneration benefits and would be an appropriate rounding off of the settlement.

This would need to be supported by the designation of the settlement as a Regeneration Area under Policy SP1. Without the allocation of the additional land (allowing for a connection between the Llanmoor site and the jointly owned BCBC and Valleys to Coast land), Bettws would again miss out on much needed regeneration and housing to meet identified local need.

Such an approach would be wholly in line with national policies relating to placemaking and regeneration of smaller Welsh communities to ensure their future prosperity and ensure that, in Bettws' case in particular, the younger generation have somewhere to live, remain close to where they were born and brought up and feel proud of, with an opportunity to stay and grow in the locality. It would also be in line with the BRLDP's Objective (SOBJ1) to create high quality and sustainable places.