



Ms A Borge
LDP Programme Officer
Bridgend County Borough Council

Date: 10 February 2023

Our Ref: JA M17/0713-19

By Email Only:
LDPProgrammeofficer@bridgend.gov.uk

Dear Ms Borge

RE: BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033) EXAMINATION

HEARING SESSION 2 - ACTIVE, HEALTHY, COHESIVE, INCLUSIVE AND SOCIAL COMMUNITIES – HOUSING AND GREENSPACE ISSUE – PROVISION OF OUTDOOR SPACE AND ACCESSIBLE GREENSPACE

RESPONDENT NUMBER 874 – TETLOW KING PLANNING ON BEHALF OF MULLBERRY HOMES LTD

Thank you for sending me the Planning Inspector's invitation to Tetlow King Planning to participate at the Bridgend LDP Examination.

I am pleased to provide answers to the Inspector's questions for matter 2 below. I respond to the specific questions that are relevant to our previous representation to the Deposit LDP consultation.

Inspector's question 9 - Should Policy COM11 include reference to promoting provision through enabling development?

Bridgend County Borough Council (BCBC) responded to our request that Policy COM11 should be amended to support enabling development to deliver the sought Natural and Semi-Natural Greenspace in its 'SD20 Deposit Consultation Report Appendix Volume 16 – Developers and Landowners Consultation Responses' (Page 129, respondent 874). BCBC states:

"As worded, Policy COM11 clearly states that the Replacement LDP will promote the provision of accessible Natural and Semi-Natural Greenspace wherever suitable opportunities arise. Such opportunities include, but are not limited to, appropriate development proposals. However, the proposed change of wording is considered too flexible. Some development proposals may enable greater access to accessible natural greenspace but be unacceptable for other material planning reasons. For this reason, the proposed amendment to Policy COM11 is not supported."

I disagree with the Council. I consider that in promoting opportunities for the provision of accessible, Natural and Semi-Natural Greenspace (including Amenity Green Space), the policy should be clearer that 'promotion' includes supporting development that will help to enable the creation of such space, including its accessibility.

As an example, I refer to the site at land off Waunscil Avenue, Bridgend. We referred to this site in our previous representation to the Deposit LDP. We are agents for a planning appeal that has recently been submitted to the Welsh Assembly (but is not yet validated).

Adopted Policy COM13 of the adopted Bridgend LDP states that *"The Council will promote the provision of accessible natural greenspace (including public open space) wherever suitable opportunities arise."*

The appeal site is allocated as accessible natural greenspace under Policy COM13(9), land off Waunscil Avenue.

The scheme is a comprehensive proposal for accessible natural greenspace throughout the length of the site. Of the total appeal site, only its southern half will be developed for housing, gardens and the access road.

During previous planning appeals, Inspectors have considered and found acceptable the combination of residential proposals and the Council's aspirations for public open space and a community route at the site. The location of open space and the route of the community route (a walking and cycling route) was considered acceptable in earlier schemes.

For example, in the 2005 appeal (APP/F6915/A/05/1180711), the Inspector found that the site's development for both housing and the community route would provide an opportunity for a significant section of the community route to be provided.

The Inspector stated in paragraphs 16 and 17 that: *"Such a route would be of particular benefit to local residents, some of whom currently traverse the route despite its gradient, its overgrown and muddy state, and the absence of lighting or natural surveillance. Thus, I consider that in relation to the desire to promote public open space and play area provision and to achieve cycle and community routes, the envisaged development has the potential of meeting the aims of the Council's development plan."*

Similarly in the 2010 appeal (APP/F6915/A/08/2080480/WF) the Inspector considered that the proposed landscaping, community route and new access points would *"significantly improve the provision of public open space in the area."* (Paragraph 10). The Inspector added that the proposal presented a realistic opportunity to achieve the provision of public open space as part of the development.

Again in the 2011 appeal (APP/F6915/A/11/2154074), the Inspector recognised *"the benefits of the scheme in terms of the use of derelict, brownfield land to provide a sustainable development of housing and the associated community route and public open space"* which he made clear were *"in accordance with development plan policies."*

Providing this residential development at an alternative site will not deliver the accessible natural greenspace, which is allocated at the site.

I therefore consider that draft Policy COM11 should be amended as follows:

"The Council will promote the provision of accessible, Natural and Semi-Natural Greenspace (including Amenity Green Space) wherever suitable opportunities arise, including by supporting wider development proposals that enable the realisation of and greater accessibility to such space. In this respect, the following areas are specifically allocated..."

Inspector's question 9 - Has the site allocated at Waunscil Avenue, Bridgend (Policy COM11(7)) been correctly annotated on the proposals map?

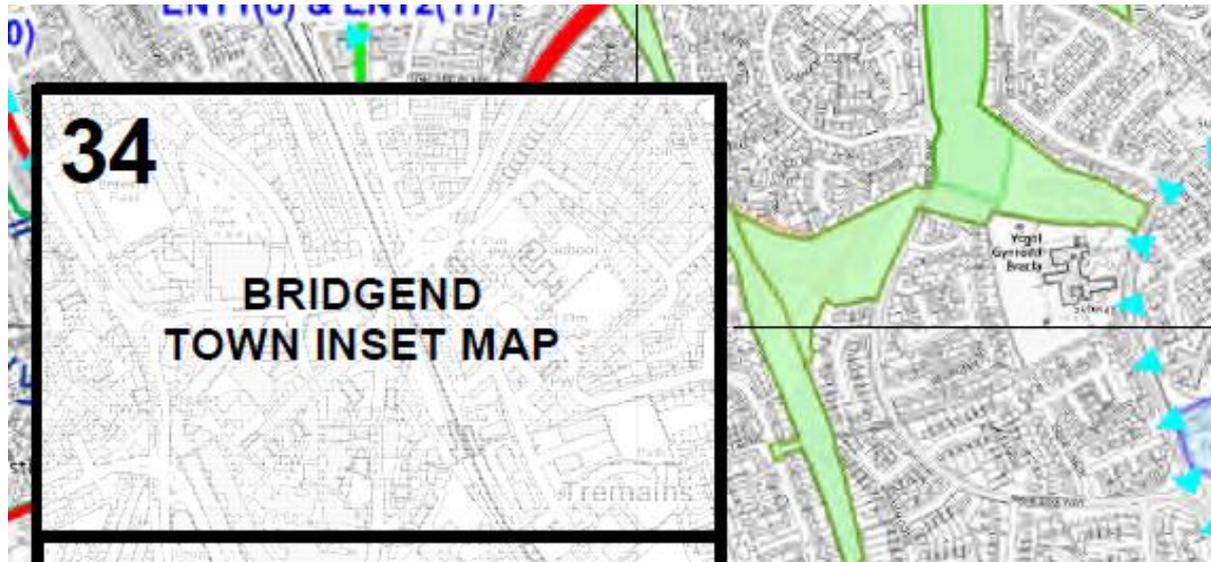
Draft Policy COM11 relates to the provision of Natural and Semi-Natural Greenspace (including Amenity Greenspace). The title of the policy in the contents page iv refers to the policy's title as *"including open space"*, but the heading and text of the policy itself does not refer to 'public open space' directly.

Draft Policy COM11 states that *"The Council will promote the provision of accessible, Natural and Semi-Natural Greenspace (including Amenity Green Space) wherever suitable opportunities arise. In this respect, the following areas are specifically allocated..."*

The policy, sub-section COM11(7), then specifically identifies the site, Land off Waunscil Avenue, as being an area allocated for such promotion. This maintains a designation that applied to the site in the previous LDP.

The accompanying Proposals Map, however, on page 27 (and a corner of the inset map on page 34) shows the site in light green, see Figure 1 below.

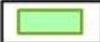
Figure 1 – Extract from the draft Proposals Map (Appendix 7), page 27



Source: BCBC

The key denotes this colour as an Outdoor Recreational Facility, see Figure 2, but it states that this refers to draft Policy COM11. The Outdoor Recreational Facility Policy is actually draft Policy COM10.

Figure 2 – Extract from the key to the draft Deposit LDP Proposals Map

	Landscape Character Areas - LCA
	Outdoor Recreation Facilities - COM11
	Cemeteries - COM13
	Gypsy Traveller Provision - SP7

This appears to be an error. The key should refer to Natural and Semi-Natural Greenspace (including Amenity Greenspace) under that colour, and Policy COM11.

Tetlow King Planning raised the above matter in our representation on the Deposit Plan. In response, BCBC noted that “*The title of Policy COM11 will be amended to that it is the same in the contents page and the main document. The Key in the Proposals Map will also be amended to represent the correct policy.*” (SD20 Deposit Consultation Report Appendix Volume 16 – Developers and Landowners Consultation Responses’ Page 129, respondent 874)

Notwithstanding the above comment, it is unclear from the Examination documents that the above changes have been implemented in the Submission Plan.

Yours sincerely



JONATHAN ADAMS
SENIOR DIRECTOR
For and On Behalf Of
TETLOW KING PLANNING

jonathan.adams@tetlow-king.co.uk