

## Bridgend LDP

### Reg 15 Pre-Deposit Consultation: Welsh Assembly Government Response

-(We note that a <b>SELF-ASSESSMENT</b> based on the soundness tests has been <b>PROVIDED</b> at Preferred Strategy stage (at Appendix G Self Assessment Soundness Test); LDP Manual 6.5.1)	
<b>P1 - Prepared in accordance with the Delivery Agreement including the CIS</b>	
<b>Comments</b>	<b>Suggested Actions</b>
We have assumed that the Preferred Strategy has been prepared in accordance with the Delivery Agreement. Please advise if this is not the case – the self-assessment doesn't indicate any discrepancies (page 174).	N/A
<b>P2 - Subjected to Sustainability Appraisal including Strategic Environmental Assessment (and Habitats Directive Appropriate Assessment)</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<p>SA/SEA: We note that:</p> <ul style="list-style-type: none"> <li>- paras 1.1.3 of the Preferred Strategy advises that it has been subject to SA/SEA ; supporting documentation (prepared by Baker Associates) is the Sustainability Appraisal of the Bridgend Local Development Plan (Nov'08). The Sustainability Appraisal Report is subject to current consultation.</li> </ul> <p>Habitats Appropriate Assessment (HRA): We note that:</p> <ul style="list-style-type: none"> <li>- the Preferred Strategy has undergone the first key stage (screening for likely significant effects) of the HRA assessment in discussion with CCW;</li> <li>- para 1.1.4 of the Preferred Strategy advises that it has been subject to HRA (we note that the SA/SEA &amp; HRA are running in parallel but are clearly distinguishable); supporting document is the Habitats Regulation Assessment Screening Assessment, Nov'08 which is subject to current consultation.</li> <li>- the HRA Screening Report advises that:- all Natura 2000 sites within the County Borough, or within 15km of the County Borough boundaries have been identified. Three SAC sites are identified within</li> </ul>	N/A

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<p>the County Borough, and seven sites outside the County Borough boundary (3.2). The screening identified the potential for negative impacts on several Natura 2000 sites in Bridgend County Borough. These are Kenfig, Cefn Cribwr Grasslands and Blackmill Woodlands SACs.</p>	
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<b>C1 It is a land use plan which has regard to other relevant plans, policies and strategies relating to the area or to adjoining areas.</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<p>We note that section 4 of the preferred strategy aims to provide the national, regional and local policy context for the LDP and refers to a number of the key relevant plans, policies and strategies:</p> <p><b>National:</b> PPW, MPPW, TANs, Circulars, MIPPS, LDP Regulations, WSP: People, Places, Futures.</p> <p><b>Regional:</b> South East Wales Housing Apportionment Memorandum of Understanding, Draft South East Wales Transport Plan, South Wales Renewable Energy Study (being prepared), Regional Tourism Strategy 'Open All Year', South West Wales Regional Waste Plan (Nov 2003), South Wales Regional Technical Statement for Aggregates, River Basin Planning and Catchment Flood Management Plans (produced with EAW), Countryside Access Planning (with CCW), Integrated Coastal Zone Management and Marine Planning (with WAG).</p> <p><b>Local:</b> Community Strategy (2004), Corporate Plan 2008-2011, Fit for the Future - Regeneration Strategy (2008), Your Life- In a Healthier Community: Health, Social Care and Wellbeing Strategy (2008), Bridgend County Children and Young People's Plan, Bridgend Local Housing Strategy 2007, Bridgend Sustainable Economic Regeneration Strategy and Action Plan, Never too old - Joint Strategy for Older People Living in Bridgend County Borough, Tourism Strategy (2002-06), Bridgend Community Safety Partnership Crime and Disorder Strategy (2005-2008), Bridgend Local Health Board Primary Care Estates Strategy 2004, Local Biodiversity Action Plan (2003), The Revised Countryside Strategy for Bridgend (2002), Swansea Bay Shoreline Management Plan (2005), Communities First Action Plans.</p> <p><b>LDP Evidence Base (14):</b> Bridgend local housing Strategy (2007, yet to be published), Local Housing Needs Assessment (2007), Joint Housing Land Availability Study (2007), South East Wales Housing Apportionment Memorandum of Understanding (2007), Caerau ward neighbourhood renewal area assessment (2006), Bridgend County Borough: A Smart Future – Sustainable Economic Regeneration</p>	

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<p>Strategy &amp; Action Plan (2006), Employment land review (2006), Retail needs planning study 2007-2021 (2008), retail needs assessment update (2004), Bridgend town centre vision (2007), Bridgend retail needs assessment population scenarios – report addendum final 2008, Fit for Future: Bridgend regeneration strategy 2008-2021 (2008), South West Wales Regional Waste Plan (2003), Bridgend Municipal Waste Management Strategy (2004), Outline Regional Transport Plan for South West Wales (2007)</p> <p><b>Relationships:</b> The Plan identifies collaborative working undertaken by the authority in relation to a number of issues; housing apportionment, transportation planning, renewable energy, special landscape area designation, economic development, tourism, waste planning, minerals planning and other collaborative work (section 4.3). The Preferred Strategy document also considers the County Borough within the wider region, examining the impacts of neighbouring planning authorities' LDP strategies (section 4.4).</p>	
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<b>C2 It has regard to national policy.</b>	
<p><b>Comments</b></p> <p>LDP Wales (and the PPW Companion Guide) makes clear that though LDPs must have regard to national policies, they should not repeat them, but rather explain how they apply to the local area. The draft strategic policies in the preferred strategy document should be the key delivery mechanisms for areas of change in the preferred spatial strategy (LDP Manual paragraph 6.5.1).</p> <p>N.B. Comments in relation to national policy are included under soundness tests CE1 &amp; CE2</p>	<p><b>Suggested Actions</b></p> <p>See comments under soundness tests CE1 &amp; CE2</p>

<b>C3 It has regard to the Wales Spatial Plan</b>	
<p><b>Comments</b></p> <p>The Preferred Strategy generally aligns with the Swansea Bay – Waterfront and Valleys Area and the South East – The Capital Network Area of Wales Spatial Plan.</p>	<p><b>Suggested Actions</b></p>

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<b>C4 - Has regard to the relevant community strategy/ies.</b>	
<b>Comments</b>	<b>Suggested Actions</b>
Section 4.5 identifies the community strategy, the corporate plan and other local plans and strategies which have a close relationship to the LDP. The self-assessment soundness test says that the PS has been prepared in the context of the Community Strategy.	To note.
<b>CE1 The plan sets out coherent strategy from which its policies and allocations logically flow and/or, where cross boundary issues are relevant, it is compatible with the development plans prepared by neighbouring authorities &amp; CE2 The strategy, policies and allocations are realistic and appropriate having considered the relevant alternatives, and/or are founded on a robust and credible evidence base</b>	
<b>Comments</b>	<b>Suggested Actions</b>
<p>The Preferred Strategy documentation should make clear what the key issues are that the LDP will address, the vision, objectives, consideration of the strategic spatial options and how the preferred spatial strategy has been reached (see LDP Manual section 6.5). These are identified in the Preferred Strategy document at sections 6 to 9.</p> <p>The preferred strategy document has a logical flow, from context and the identification of issues, through to the vision, options, preferred strategy and strategic policies. The plan is longer than would generally be expected at Regulation 15 stage, and some of the background information could have been put in background papers, however the information provided is clear and detailed.</p> <ul style="list-style-type: none"> <li>- Section 3 provides detailed spatial context with some good, clear and relevant information. Some consideration could have been given to the conciseness of this section.</li> <li>- Section 4 summarises the national, regional and local planning context, as well as other strategies which have been used to inform the preferred strategy.</li> <li>- Section 5 gives the key national, regional and local needs and issues and has identified a number of key land-use issues for the plan area, which appear on the whole to be logical.</li> <li>- The LDP vision (para 6.1) is distinct from the Community Plan Strategy and contains a spatial</li> </ul>	<p>Whilst the background contextual information on key issues is very useful for this consultation stage, the deposit plan will need a more succinct format, supported by evidence.</p> <p>It is unclear what relationship the 8 sub areas in chapter 3 have to the statement in paragraph 6.1.4 which clearly identifies only 3 distinct areas.</p> <p>The vision goes some way to dealing</p>

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<p>dimension indicating where key changes are to take place. However, it could be phrased around how places will have changed by 2021 rather than what will be the “catalysts for change”.</p> <ul style="list-style-type: none"> <li>- The LDP objectives (para 6.2) appear on the whole to be logical and numbering the issues and objectives increases transparency of how the objectives relate to the issues. Improvement would be to have SMART objectives which include details of the actions that need to be taken to achieve the vision (and timescales if appropriate) and which would make them easier to monitor and ensure the strategy is being delivered.</li> <li>- The range of growth options considered appears to contain some anomalies. The Council has considered the following growth options: <ol style="list-style-type: none"> <li>1. Population and household do nothing option;</li> <li>2. Population and household UDP growth option;</li> <li>3. Population and household trend based growth option;</li> <li>4. Population and household High growth option;</li> <li>5. Population and household Very High growth option;</li> <li>6. Low Employment growth option;</li> <li>7. Medium employment growth option;</li> <li>8. High employment growth option.</li> </ol> </li> </ul> <p>Options 4 and 5 consider growth of 20% (648 dwellings per annum) and 30% (702 dpa) above the long term build rate over 1991-2006 (540 dpa). These are described as ‘High’ and ‘Very High’ growth options. The Council’s Preferred Strategy encompasses Option 3, the trend based growth option (540 dpa) because it scores the highest in the assessment. However, it is unclear how the low, medium and high employment growth options (options 6-8) relate to proposed levels of housing provision. The level of housing provision in option 3 may not provide sufficient economically active labour to meet projected employment growth. This also has implications for commuting levels and patterns.</p> <p>It is also unclear why Appendix D, which concerns the Consultation and Sustainability Appraisal, states at paragraph D1.5 that the Key Stakeholders Forum was “requested to give particular consideration to the merits of the trend-based growth strategy option, and the UDP growth based strategy option, with a view to informing which should be taken forward as the Preferred Strategy for growth in the LDP”. This</p>	<p>with spatial distinctiveness, yet it could be reworded to identify how places will change by 2021</p> <p>Consider developing into SMART objectives for the Deposit plan to aid clarity for monitoring; ensure that any links / inconsistencies / conflicts between objectives are identified and also identify any prioritisation that is required.</p> <p>It is advised that greater clarity is required to demonstrate why option 3 best meets the authority’s needs, particularly in relation to employment labour provision, commuting patterns and impacts on adjoining plans.</p> <p>The opportunities and implications surrounding all options should be available to stakeholders to make</p>
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<p>raises concerns as to whether the other alternative growth options were ever viewed by the Council as being possible options to be taken forward.</p> <p>Whilst the housing apportionment process is referred to it is unclear as to how evidence for the individual authority influenced its conclusions and thus how that relates to the chosen growth level.</p> <p>The summary analysis of the development of the spatial strategy options (i.e. 1. economic led, 2. regeneration led, 3. Population and settlement led)</p> <p>The strategic policies (section 6) appear to be well aligned to the objectives and the chosen strategy option; they usefully provide clear links to the objectives. A few wording amendments are suggested below. The package of policies in the deposit plan should provide greater detail.</p> <p>Monitoring indicators are identified for the majority of Strategic Policy in section 9. The monitoring and implementation framework is critical in showing how the strategy will be delivered.</p>	<p>fully informed conclusions.</p> <p>Clarify the evidence base that underpins the housing apportionment figure and demonstrate how further evidence has refined the process and influenced the strategy.</p>
<p><b>Employment</b> Policy SP10 (Employment and the Economy)</p> <p>As of 2006, there were 217 hectares in the employment land bank, which was and continues to be an over allocation based on the figures provided. The Plan describes an over allocation based on the figures provided. The Plan describes short term and long term take up rates and appears to favour the latter as a basis for a land bank, which represents 11 hectares per year or 165 hectares over the Plan period. The Plan suggests existing sites will be reviewed, and those falling in to the surplus identified above are likely to be 'reassigned' for mixed use purposes.</p> <p>The preferred growth option is medium employment growth which corresponds to the land bank referred to above. Most of this land appears to be made up of existing allocations although it was suggested some new sites may come forward following review. The first spatial strategy is economic led and suggests this would be based on the spatial distribution of existing employment allocations. Whilst the second strategy, regeneration is the preferred option it would be useful to see how regeneration will differ from the first strategy spatially, considering much of the employment land may be the same. It is appreciated that regeneration refers to other forms of employment too.</p>	<p>The deposit plan and its evidence base should;</p> <ul style="list-style-type: none"> <li>- provide robust evidence to support the chosen employment growth option;</li> <li>- identify any strategic employment sites;</li> <li>- be robust and realistic in terms of employment land allocations and their deliverability;</li> <li>- clarify the inter-relationship between housing and employment land allocations within the plan area and with</li> </ul>

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<p>The plan also estimates an increase of 3,836 workers over the plan period, to be made up from increases in local population and inward commuters. At a UDP job density this equates to a requirement of 77 hectares of land (obviously different from the 160+ hectares based on past build rates), but a predicted sectoral change in the economy could lead to higher densities over the LDP period. The preferred Population and Household Trend based Growth Option predicts a population increase of 9,774 by 2021 of which 1,283 participate in economic activity. However, the latter figure is somewhat lower than Cambridge Econometrics predicted 3,846 increase in workers, which raises the issue of where the difference is coming from. As the document acknowledges (pages 79 and 80), such a difference could be made up for by additional commuting into the Borough or by increased employment rates, particularly in the 18-25 age group. However, the former would be unsustainable and it is questionable whether the latter would be realistic, given there have been initiatives operating in the past.</p> <p>Looking forward over a 15 year period these figures are difficult to assess with any accuracy. There is of course the added factor that the economy is presently in a recession and it is not clear how hard this will affect certain areas or how long it will take to return to a more buoyant position.</p> <p>Strategic employment sites are identified and represented on the Strategic Diagram.</p> <p>There is a general underlying concern about whether the choice of the Trend Based Growth Option suitably reflects aspirations for economic growth in the sub-region.</p> <p>Table 9.1 would have been more meaningful for consultation purposes on the Preferred Spatial Strategy if there was an attempt to provide a broad breakdown of the level of housing units/employment land envisaged in each sub-area rather than simply whether it will mean breaking out of existing settlement boundaries or not.</p>	<p>neighbouring plan areas;</p> <ul style="list-style-type: none"> <li>- provide greater evidence to justify a policy shift to increase prosperity in the more deprived areas through greater articulation of regeneration activities, bringing labour back into the workforce, skills training and market analysis demonstrating a viable future;</li> <li>- ensure flexibility to adapt to the cyclical economy;</li> <li>- ensure the Plan is deliverable.</li> </ul>
<p><b>Housing</b> (page 118-122 &amp; policy SP13)</p> <p>The Preferred Strategy aims to meet the identified housing needs of Bridgend and to ensure that a significant proportion is affordable housing. However, the authority's Local Housing Market Assessment</p>	<p>The deposit LDP the should:</p> <ul style="list-style-type: none"> <li>- provide robust housing figures</li> </ul>

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(LHMA) is not due to be completed until later in 2009. The current evidence base is their 2006 Local Housing Needs Assessment which indicates an annual affordable housing requirement of 636 homes. This compares with an annual average build rate for both market and affordable housing of approximately 500 units and the 2007 Joint Housing Land Availability Study estimate of the provision of 84 affordable homes per annum up to 2012. Bridgend state that they are awaiting the results of the 2009 LHMA before establishing their affordable housing target. The Preferred Strategy therefore establishes a growth option without taking this critical information into account, whereas other growth options might result in a higher housing figure which would provide greater scope for the delivery of affordable housing.

Bridgend also state that they will be reviewing their affordable housing threshold and quotas (currently 15 units and 15% and 30% respectively). However, about 70% of the plan's housing requirement is to be delivered on committed sites. The Preferred Strategy recognises that the planning system alone will not be able to meet the affordable housing requirement, but due to the lack of up-to-date evidence it is unclear how the plan will reconcile the position to enable it to meet the objective of meeting identified need.

A review of the growth options may be required, alongside the proposed review of the threshold and quotas and a review of the sites in the land supply. A low or medium growth option (albeit higher than the trend based option 3) may have matched the scores of the trend based growth option or even bettered them given a higher housing figure would provide greater scope for the delivery of affordable housing, (through additional allocations) and it would more closely reflect economic growth aspirations. (Paragraph D2.16 in Appendix D appears to acknowledge these potential benefits).

Also comparisons of the 'High' and 'Very high' growth options with the housing apportionment figure (500 dpa) and the resulting comments that they 'significantly exceed' it, is naturally skewed by the fact the apportionment figure is below the past long term trend figure (540 dpa).

There does not appear to be any evidence of an assessment of the inter-relationship between the housing and employment land allocations and those of neighbouring authorities.

- which are adequately evidenced and supported by an up to date Local Housing Market Assessment;
- clarify the inter-relationship between housing and employment land allocations within the plan area and with neighbouring plan areas;
- clarify and evidence that all the options for increasing the affordable housing target have been explored;
- identify and provide sufficient evidence to clarify the reasons for and viability of the thresholds chosen to deliver affordable housing.



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<p><b>Retailing and Commercial Centres</b> (policy SP11) Bridgend CC wish to maintain a retail hierarchy based on the largest settlements i.e. Bridgend, Porthcawl and Maesteg Town Centres. Details are provided on town centre regeneration schemes. It is unclear why there is an indicator concerning renewable energy schemes under this retail policy.</p>	
<p><b>Transport</b> (page 112 &amp; policy SP3) Policy SP3 Strategic Transport Planning Principles, introduces 8 strategic transport planning principles. It also lists 14 strategic transportation schemes as identified in the Regional Transport Plan. It is not clear as to how some of the proposals are deliverable in terms of a realistic likelihood that the necessary finance is, or will be, available and committed.</p>	The deposit LDP should reflect the RTP and provide clarity on deliverability.
<p><b>Gypsy and Travellers</b> Under sections 225 and 226 of the Housing Act 2004, local authorities have a duty to assess and consider the needs of Gypsy Travellers. There is no evidence of a Gypsy Travellers assessment being undertaken in the Preferred Strategy, as no reference is made to Gypsy Travellers. The Assembly Government is aware from Gypsy Traveller Count figures (which should be available to the Council) that an unauthorised site with 12 caravans within Bridgend was recorded.</p>	Provide evidence on how Gypsy Traveller needs are identified and addressed in the plan.
<p><b>Infrastructure</b> (Policy SP15) The first part of the policy, which relates to planning obligations, should be phrased around developments addressing the infrastructure needs they create rather than providing “appropriate benefits”.</p>	To consider. Greater clarity on the type of infrastructure required, linkages to development, funding and phasing. Deliverability is critical.
<p><b>Conservation of the Built and Historic Environment</b> (page 112/113 &amp; policy SP5) It is considered that the Preferred Strategy document has taken adequate account of the historic environment. It is suggested that the policy should be worded “significant adverse impact” rather than “adverse impact” to allow more flexibility.</p> <p><b>Landscape</b> (page 112/113 &amp; policy SP4 Conservation of the Natural Environment) The relationship between protecting the landscape, and the proposed volume and location of development (including residential, tourism etc), could be explored further in the deposit plan. The</p>	To consider.  To consider.

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<p>importance of local landscape character should be considered. It is suggested that the policy should be worded “significant adverse impact” rather than “adverse impact” to allow more flexibility.</p>	
<p><b>Nature Conservation and Biodiversity</b> The prominence given to valuing, promoting, sustaining and protecting the natural environment for the future is welcomed. Reference to the requirements of the Natural Environment and Rural Communities Act (2006) (NERC Act), in particular the biodiversity duty would support the plan's approach. Implementation will be the key factor determining how well the LDP achieves its aims regarding biodiversity, and detailed site based guidance, possibly through SPG, may be required.</p>	<p>Consider referring to the NERC Act in the deposit plan.</p>
<p><b>Minerals</b> (page 17, 52, 113 &amp; 114 &amp; policy SP6 Minerals Supply, SP7 Minerals Protection)</p> <p>No new allocations are anticipated. This is in accord with the RTS, although the RTS does refer to the consideration of areas of search for high quality materials, and this should be assessed within the plan period.</p> <p><b>Limestone</b> The proposals identify the safeguarding of high purity limestone around Cornelly Quarry and high PSV sandstone in the north of the County Borough. Additional limestone other than high purity and proximate to Cornelly should be safeguarded. The RTS refers to safeguarding limestone and sandstone, and it is important that these areas are not drawn too narrowly.</p> <p><b>Sand and Gravel</b> Reference to the safeguarding of sand and gravel resources should also be made in section 4 to avoid any conflict with 9.2.34.</p> <p><b>Coal</b> The reference to coal in 4.3.20 should refer to resources not reserves. Para 9.2.34 refers to the safeguarding of coal, but it is suggested that a paragraph should be added referring to the areas where coal working will not be acceptable over the plan period. The reference to coal in the North suggests that none of the extensively worked primary resources will</p>	<p>The deposit plan should:</p> <ul style="list-style-type: none"> <li>- adequately safeguard mineral resources in line with national policy;</li> <li>- identify the appropriate Buffer Zones on the proposals map and include a policy;</li> <li>- ensure references are made to coal resources not reserves;</li> <li>- Clarify areas where coal working will not be acceptable over the plan period;</li> <li>- Consider the inclusion of a development management policy on coal extraction and SPG on minerals</li> <li>- Consider the transportation of minerals.</li> </ul>

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<p>be protected. The evidence base should justify this.</p> <p>It should be considered whether the absence of a development management policy on extraction will lead to difficulties – consider extensions, sand and gravel, vernacular building stone, pre-extraction of coal, borrow pits, There is no proposal for SPG on minerals which could potentially leave a gap.</p> <p>With reference to the transport of minerals, do any rail links or wharves need to be protected?</p> <p><b>Policy SP6</b> Regarding the landbank, it is suggested that hardrock should be added. There may be wider needs for minerals supply other than for local and regional needs and the policy should not be restrictive.</p> <p><b>Policy SP7</b> This policy refers to minerals generically, whereas the following buffer zones vary for the type of mineral. A 500m buffer zone should be shown for coal sites, 200m for hard rock quarries, 100m for sand and gravel.</p> <p><b>Policy SP13</b> It is noted that the following strategic sites are identified for residential development: Parc Derwen, Bridgend Maesteg Washery Coegnant Colliery Porthcawl Waterfront Are any of these sites on areas for minerals safeguarding? If so, it needs to be clear what factors will determine the decisions.</p>	
<p><b>Waste</b> (page 114 &amp; policy SP8 waste management) Five sites are also identified for up to four waste treatment facilities in policy SP8 to meet regionally identified need. The deposit plan should clarify the regional search criteria and clarify the principles of sustainable waste management contained in the policy. The Preferred Strategy states “at present there is no landfill capacity within the County Borough and this issue will need to be the subject of further assessment in the Deposit LDP”.</p>	<p>Ensure deposit plan is sufficiently robust.</p>

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<p><b>Climate Change</b> While Climate Change is given due consideration in the draft Preferred Strategy further explanation of how the LDP responds to the effects of Climate Change on the county and how this will affect the strategy is recommended for the deposit plan.</p>	<p>Ensure clarity in the deposit plan.</p>
<p><b>Renewable Energy (Policy SP9)</b> A policy is included on Energy Generation and Conservation (policy SP9). It is suggested that the policy should be worded “significant adverse impact” rather than “adverse impact” to allow more flexibility.</p>	
<p><b>Water and flooding</b> The Preferred Strategy states (para 3.3.13) that “according to the EAW’s flood risk maps, human health and property in the southern parts of Bridgend town, the Ewenny Valley upstream to Pencoed and the valley towns of Maesteg and Ogmere Vales are at ‘significant risk’ of flooding. Parts of Porthcawl and the coast are also at risk from tidal inundation and storm surges.”</p> <p>It is unclear how flooding and inundation have been addressed by the strategy and the impact of flooding on the proposed strategic sites. It is noted that a number of strategic sites are located in flood zones C1 and C2 yet it is unclear how the issue of flooding will be addressed and what mitigation measures will be in place to reduce the impact of potential flooding.</p> <p>The authority should follow the precautionary approach as set out in TAN 15, and direct new development away from those areas which are at high risk of flooding. “Allocations should only be made in zone C if it can be justified that a development has to be located there in accordance with TAN 15 and if the consequences of locating development are acceptable, in accordance with national policy. You need to ensure that a full explanation and justification of the allocations in zone C are made. A proposed allocation should not be made if the consequences of a flooding event cannot be effectively managed.</p> <p><b>Water Quality</b> (para 3.3.14) It is stated that surface water quality of several rivers may fail objectives of the Water Framework Directive, (WFD) especially where river courses have been artificially changed in towns and</p>	<p>To note and ensure development is directed away from areas at significant risk of flooding.</p> <p>The WFD is European legislation and should be addressed accordingly.</p>

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villages, and where they are polluted from agricultural and industrial discharges. It is also stated that three ground water locations are 'at risk' or 'probably at risk' of failing the WFD.	
<p><b>Water infrastructure</b></p> <p>Ensure that adequate evidence is provided to ensure that there is sufficient resource available to deal with additional demand for water. Early engagement with Dwr Cymru is recommended.</p>	<p>Ensure adequate evidence. The deposit plan should address the issues in relation to increased demand for water. Early engagement with Dwr Cymru.</p>
<p><b>Land contamination</b> (page 18)</p> <p>The outcomes of the review of contaminated land inspection is awaited to identify whether this will be a significant issue in terms of delivery. National planning policy advises that the nature, scale and extent of contamination, which may pose a risk to human health, should be considered as part of plan preparation to ensure that development is not undertaken without an understanding of the risks. Some understanding of the scope to overcome any actual or potential contamination may be a necessary part of understanding the risks if this is to impact on delivery.</p>	<p>Consider for deposit plan</p>
<p><b>Agricultural land</b></p> <p>There are no issues of consistency with the national planning policy requirement to conserve the best and most versatile agricultural land (PPW para 2.8.1).</p>	<p>To note</p>
<p><b>Design</b> (policy SP2 Sustainable Place Making Principles)</p> <p>Assume that the deposit plan will clarify if there are parts of the area that need specific LPA guidance regarding what will be required in design statements (e.g. town centre), and any information on SPG (development briefs, masterplans etc).</p>	<p>Consider for deposit plan</p>
<p><b>Welsh Language</b></p> <p>Consideration should be given to whether the Welsh language should feature in any of the LDP objectives, taking account of PPW paragraph 2.10.2.</p>	<p>To consider</p>

<b>CE 3 There are clear mechanisms for implementation and monitoring</b>	
<b>Comments</b>	<b>Suggested Actions</b>

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<p>A monitoring framework is at section 9 which sets out indicators and targets for the majority of the strategic policies.</p> <p>SP1/2: The monitoring target should perhaps be 100% compliance with EAW advice, rather than 95-100%.</p>	<p>Ensure the monitoring and implementation framework will be satisfactory for measuring the effectiveness of the plan strategy and policies. (+ see LDP Manual para 9.5)</p>
<p><b>CE 4 It is reasonably flexible to enable it to deal with changing circumstances</b></p>	
<p>Comments</p>	<p>Suggested Actions</p>
<p>The deposit LDP should be sufficiently flexible to enable it to deal with changing circumstances (such as a key site not coming forward for development), and identify any contingencies that might be in place, or what would trigger a review of the Plan.</p> <p>It is indicated that implementation will be dealt with in more detail in the deposit version of the plan.</p>	<p>Particularly important will be ensuring that the significant developments identified can be delivered, including clarification of timescales. Funding streams, key delivery agents, and infrastructure requirements will need to be identified at an early stage.</p> <p>Ensure the preferred strategy is sufficiently flexible to respond to changes in the economy, housing market assessment, key site take up and other changes.</p>