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**Representor ID: 1209**

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**By Email: [ldp@bridgend.gov.uk](mailto:ldp@bridgend.gov.uk) ; [LDPProgrammeOfficer@bridgend.gov.uk](mailto:LDPProgrammeOfficer@bridgend.gov.uk)**

C/O Amanda Borge  
LDP Programme Officer  
Bridgend County Borough Council,  
Civic Offices,  
Angel Street,  
Bridgend,  
CF31 4WB

Dear Sir / Madam,

**BRIDGEND COUNTY BOROUGH COUNCIL LOCAL DEVELOPMENT PLAN EXAMINATION**

**RESPONSE TO MATTERS AND ISSUES: HEARING SESSION 2: ACTIVE, HEALTHY, COHESIVE, INCLUSIVE AND SOCIAL COMMUNITIES – HOUSING AND GREENSPACE**

Please find enclosed, on behalf of, and under instruction from the landowner and promoting parties (Mr H Thomas, Mr J Knight, Ms J Naylor, and Mr & Mrs Grant), a submission to the Examination of the Local Development Plan (LDP) in relation to housing allocation ref. PLA5 – Land East of Pyle.

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Hearing Session 2: Active, Healthy, Cohesive, Inclusive and Social Communities – Housing and Greenspace.

We look forward to attending the Hearing Session in respect of the matter above 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 Hearing Session 2: Active, Healthy, Cohesive, Inclusive and Social Communities – Housing and Greenspace.

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 the Landowners (Representor ID. 1209) 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 provision and distribution of housing soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?*

### Housing Provision

#### **1. Is the housing requirement figure identified in Policy SP6 appropriate?**

- a. How has the requirement figure of 7,575 been derived? and is it based on robust and credible evidence?**
- b. In identifying the requirement figure, has adequate regard been paid to the most recent Welsh Government household and population projections?**
- c. Have alternative housing growth scenarios been considered? if so, why have they been discounted, and why has the preferred option been chosen?**
- d. Has the requirement figure been informed by a robust assessment of the main local influences on housing demand in Bridgend including, household formation size, migration levels, and vacancy rates?**

A joint response to all parts of question 1 is set out below.

The housing requirement figure of 7,575 over the lifetime of the Plan (i.e. 15 years, from 2018-2033) is based on a *'balanced and sustainable level of economic growth'* (The Growth Strategy, para. 4.3.26). The figure has been derived from Office of National Statistics data, using a 2019 Mid-Year Estimate base year and assumptions from a 6-year historical period (2013/14-2018/19). As such, the data is representative of pre-Covid times, which saw population growth across the County Borough.

Maintaining the housing trajectory will ensure a level of growth that can deliver the LDP Visions and Objectives, and aligns with the national development framework: Future Wales, which identifies Bridgend as within a National Growth Area (South-East region). Moreover, it will ensure the prosperity of the County Borough by retaining and attracting a younger, more skilled population.

The inclusion of a 10% flexibility allowance within the housing trajectory is supported, as it will ensure that the Plan can achieve the Anticipated Annual Build Rate (AABR), and is resilient and adaptable in the event of any unforeseen circumstances or issues. It is considered that the housing trajectory can comfortably accommodate the prescribed growth over the Plan period as a result.

The Welsh Government are supportive of the identified housing requirement figure, as outlined within their representations on the Deposit Plan: *"The level of household growth proposed in the deposit*

*LDP is 7,575 dwellings over the plan period, an uplift of 1,905, or 33% over the 2018 principal projections. This degree of aspiration aligns with Bridgend being within a national growth area”.*

Accordingly, the site promoter is of the view that the housing requirement figure identified in Policy SP6 is undoubtedly appropriate, and is based on robust and credible evidence.

## **2. Is the housing land supply figure identified in Policy SP6 appropriate?**

### **b. What is the make-up of the housing land supply?**

It is noted that the latest / final supply figure amounts to 8,335, which has been reduced from the 9,207 dwelling figure proposed at Deposit stage.

The housing land supply figure is made up of dwelling completions (to date), land bank commitments, windfall sites, and new housing allocations. The latter component will contribute the majority to the overall supply (i.e. 4,652 units), and therefore it is essential that all housing allocations are retained in the Plan.

The approach to not include the ‘Long-Term Regeneration’ Sites (Maesteg Washery, Coegnant Reclamation Site (Caerau) and the Former Cooper Standard Site, Ewenny Road (Maesteg)) within the housing land supply figure is supported. The longer lead in times, remediation works and/or detailed strategic master plans associated with these sites would mean it is not prudent to rely on their delivery. Not least, as they have already been ‘rolled’ over from the existing LDP.

### **c. Is the Plan over reliant on the delivery of the strategic development sites? and should more non-strategic sites be allocated?**

The Strategic Development Sites have been selected in order to ensure the implementation of the Growth and Spatial Strategy, as set out under para. 4.364 of the LDP: *“The location and scale of these sites present opportunities for significant new development to take place over the plan period to help meet the 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.”*

Notwithstanding this, it is not considered that the Plan is over reliant on the delivery of the Strategic sites. The housing trajectory has factored in appropriate lead in times, and has incorporated a 10% flexibility allowance in any event. Moreover, the sites have been subject to rigorous viability and deliverability testing in collaboration with site promoters:

*“All strategic sites key to the delivery of the plan have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, highway mitigation, critical access requirements, design parameters, s106 requirements, 10 infrastructure and costs. This process provides a high degree of confidence that the sites included within Table 6 are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities.”* (para 6.4, Housing Trajectory, Background Paper 4).

All strategic sites, including PLA5, have been evidenced to be entirely deliverable and viable, and their retained allocation is critical to the delivery of the Plan.

**3. Is the rate of delivery contained in the housing trajectory realistic, and based on robust and credible evidence?**

The rate of delivery outlined in the housing trajectory (as extracted below) in respect of PLA5 – Land East of Pyle, is without doubt realistic. Not least, as mentioned above, all strategic sites have been through demanding deliverability and viability exercises.

Settlement Tier / Growth Zone	Allocated Site Name	Total Site Capacity	Time lag to construction start in months			Phasing of Development (2018-33)																			
			Time period for pre-application discussions/ PAC consultation	Time between submission of planning application and determination	Time taken from planning consent to the discharge of relevant conditions to enable site construction	Completions	U/C	18-19	19-20	20-21	21-22	22-23	23-24	24-25	25-26	26-27	27-28	28-29	29-30	30-31	31-32	32-33	Units phased beyond the plan period		
Pyle, Kenfig Hill and N Cornelly (Sustainable Growth Area)	Land East of Pyle	2003	Pre-application: 9 weeks (per phase)  PAC: 8 weeks (4 weeks minimum with a period of 4 weeks to collate and produce a PAC report per phase)	16 weeks (per phase)	8 weeks (per application)			0	0	0	0	0	0	0	0	0	70	150	150	150	150	150	150	150	1033

All landowners are committed to working towards the delivery of the site. Furthermore, considerable (indeed unparalleled) interest in the site has been received from a number of parties, with the preferred party to be shortly selected following a lengthy and extremely competitive selection process. This process has sought to ensure deliverability and quality – with an emphasis on ensuring Placemaking is at the heart of any proposal.

Given the above, it is clear that the site can comfortably yield in accordance with the trajectory.

**4. Will the Plan deliver the housing requirement?**

**a. Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?**

In respect of PLA5, the site is available for development – it is vacant and within the ownership of a small number of landowners who are committed to its delivery, and who have been actively promoting the site throughout the process via the multi-disciplinary consultancy and agency team assembled to evidence and advise.

The Development Viability Model submitted confirms that the site is wholeheartedly economically viable, having regard for all costs.

Moreover, the site is fundamentally free from constraint, as demonstrated through the suite of assessment work undertaken to date and submitted to BCBC to inform the site assessment process. The technical baseline survey and assessment work has included, but is not necessarily limited to the following:

- Agricultural Land Quality Position Statement (Kernon, 2020);
- Archaeological Desk Bashed Assessment (Archaeology Wales, 2018);
- Flood Risk Statement and High-Level Drainage Strategy (JBA, 2018);
- Ecological Appraisal (Wildwood Ecology, 2018);
- Energy Strategy (SMS, 2020);
- Multi-Utility Infrastructure Feasibility Study (SMS, 2020);
- Transport Assessment (Corun, 2020);

- Geoenvironmental and Geotechnical Desk Study Report (Integral Geotechnique, 2018);
- Headline Landscape and Visual Appraisal (White Consulting, 2018);
- Noise Technical Note (Stuart Michael Associates, 2018);
- Arboricultural Report and Tree Constraints Plan (ArbTS, 2018); and
- Review of the Proposed Footbridges over the Railway Line (RVW Consulting, 2020).

Respectively, the reports have concluded that there are no material reasons as to why the site could not be developed.

The Urbanists have produced a Land and Housing Numbers Paper (2022), accompanied by an Illustrative Masterplan and Density and Accommodation Strategy, which has been developed and refined following the extensive survey work undertaken. The masterplan demonstrates that the site can suitably accommodate all necessary highways, drainage and green infrastructure etc. without impacting upon development capacity.

Accordingly, BCBC drew the following conclusions on the site within the Candidate Site Assessment Report (2021):

*"The candidate site is located on the periphery of Pyle which is identified as a Sustainable Growth Area (as defined by SP1). The site has the potential to provide new primary schools and 2000 homes in Pyle, of which possesses a wide range of services and facilities in addition to sustainable transport links. This site will make an important contribution to meeting the housing need of the County Borough. A supporting masterplan and planning statement identifies and mitigates potential constraints relating to connectivity to Pyle via a proposed foot bridge in addition to taking into account potential flood risk. Therefore, **the site is considered to be free of any significant constraints.** The site is therefore allocated for development in the Deposit Plan." (GJP emphasis added).*

In light of the above, the site is evidently available and deliverable within the anticipated timescales, and is wholly suitable and appropriate as an allocation as a result.

***c. Is the Plan's housing strategy sufficiently flexible to respond to changing circumstances?***

The Plan identifies a housing requirement figure of 7,575, and a housing land supply figure (comprised of dwelling completions (to date), land bank commitments, windfall sites, and new housing allocations) of 8,335. As such there is a surplus of 760 dwellings / 10% provided for through the Plan and it is considered that this presents sufficient flexibility in the event that some of the sites do not come forward or are delayed. Additionally, a 10% flexibility allowance has been embedded in the housing trajectory.

Para. 7.2 of Background Paper 4: Housing Trajectory states that *'This 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.'*

In any event it is considered that there is not any potential for changes in circumstance that could affect the delivery of PLA5. This is the case not least given the extent and robust evidence underpinning each allocation: *'each proposed allocation is underpinned by detailed technical evidence that considers site-specific costs, constraints and requirements to demonstrate the sites are both viable and deliverable'* (para. 7.2 Background Paper 4: Housing Trajectory).

Housing Distribution and Development

**5. Is the spatial distribution of new housing development sustainable and coherent?**

***b. Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy?***

Policy SP1 seeks to apportion growth primarily to the Tier 1 and Tier 2 Settlements in accordance with the LDP spatial strategy. This is evident in Table 6 of the LDP, which outlines that 90% of all allocated sites (housing and employment) have been located within Tier 1 and Tier 2, with the remaining 10% to be located within Tier 3 settlements. In respect of the housing allocations, 88% of units have been apportioned to Tier 1 and Tier 2 units, as outlined above.

The Tier 1 and Tier 2 settlements are largely comprised by Sustainable Growth Areas representing a total of 66% of units across all housing allocations. In respect of PLA5, the Tier 2 settlement of Pyle, Kenfig and North Cornelly is subject 13% of the units.

Policy SP2 (Regeneration Growth Areas and Sustainable Growth Area Strategic Allocations) builds upon Policy SP1 and directs growth to the Regeneration Sites and Sustainable Urban Extensions within the Regeneration Growth Areas and Sustainable Growth Areas. The importance of the strategic sites in achieving the LDP Vision and Objectives is acknowledged at para. 4.3.65: "*The sites within SP2 are considered **essential to delivery of the LDP...***" (GJP emphasis added).

The proportion split of development across the settlement tiers, and associated strategic sites, including PLA5, are therefore critical to the successful implementation and delivery of the Plan.

**6. Will Policy COM6 ensure a balanced mix of house types, tenure and sizes? And is the approach to managing density levels appropriate?**

The amplification text to Policy COM6 sets out that "*All land utilised for development must be used as efficiently as possible and brought forward at a density which maximises the development potential of the land and the level of affordable housing provision in accordance with COM6.*"

Any development of the allocated sites would conform to the requirements of Policy COM6. The allocations have been through a rigorous exercise to demonstrate that appropriate densities can be achieved.

With regards to PLA5, the Land and Housing Numbers Paper (the Urbanists, 2022) sets out a rationale for the proposed density across the site, which is broadly consistent with an overall strategy on character and street hierarchy. The site will see a sustainable mixed density development, from circa 24 dwellings per hectare, up to a 50 dwellings per hectares. The Paper notes that "*The majority of the site will be developed at an appropriate 'gentle density' of 38 dwellings per hectare to enable a population suitable of supporting a sustainable mix of uses contained within a neighbourhood.*"

The site promoter has therefore demonstrated, and BCBC have accepted by virtue of the allocation, that a mix of density can be achieved in accordance with the requirements of COM6, as well as the Local Housing Market Needs Assessment (2021), and Policy COM3 (On Site provision of Affordable Housing).