

## BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)

### MATTER 2: ACTIVE, HEALTHY, COHESIVE, INCLUSIVE AND SOCIAL COMMUNITIES – HOUSING AND GREENSPACE

Prepared on behalf of Bellway Homes Limited

Rep ID: 222

1. Boyer is instructed by our client, Bellway Homes Limited ('Bellway'), to submit a Matter Statement in respect of Matter 2: Active, Healthy, Cohesive, Inclusive and Social Communities – Housing and Greenspace.
2. This Matter Statement should be read in conjunction with previous responses prepared by Boyer:
  - Regulation 19 Submission (July 2021)

***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?***

**Q2. Is the housing land supply figure identified in Policy SP6 appropriate?**

**a) How has the supply figure of 9,207 been derived? and is it based on robust and credible evidence?**

3. The supply figure of 9,207 is derived from a 20% flexibility allowance with the inclusion of the proposed rollover Allocation COM1(1) Parc Afon Ewenni. However, Bellway note that the current submitted Plan (SD1) proposes the removal of Parc Afon Ewenni and makes provision for 8,335 new dwellings (incorporating a 760 dwelling over allocation / 10% flexibility allowance) to accommodate a housing requirement of 7,575 dwellings during the 15 year LDP period from 2018 to 2033.
4. As detailed in response to Question 2(f) Bellway consider that the proposed minimum flexibility allowance is not sufficient nor robust to address the deliverability of the Plan. Bellway highlight Strategic Planning Policy Officers continued assessment that a greater than 10% minimum flexibility allowance is essential. This is reflected in the original Plan and at Focussed Changes Stage, where it was clearly evidenced that a 13% flexibility allowance, was required ensure the Anticipated Annual Build Rate (AABR) would remain deliverable throughout the Plan period and to cater for a significant unforeseen scenario, such as non-delivery of a strategic site.
5. Bellway consider that given the nature of the non developer allocations and strategic sites then the greater flexibility is essential. Bellway confirm that to allow certainty over the Plan period, the additional flexibility allowance should be accommodated by the developer led site at Heol Fach, North Cornelly (Bellway – 222.C1). In fact, Officers presented the site as a proposed new Allocation at Heol Fach, North Cornelly, which was necessary for incorporation into the trajectory to provide a greater flexibility.
6. A higher than 10% flexibility allowance has been agreed at Swansea City Councils RLDP examination where it was the view that, given the range and choice of housing sites provided in

the Plan, a flexibility allowance of 13.1% was appropriate and would sufficiently allow for unforeseen delays or issues in meeting the housing requirement.

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

7. Bellway are aware of only one developer led strategic site which can provide certainty on delivery. Consequently, Bellway consider that there is an over reliance on the non developer led strategic sites, and in particular Land East of Pyle (PLA5 and SP2(5)), due to its size and infrastructure requirements. As outlined in response to Question 2(f) and Question 3, Bellway consider that there should be a greater flexibility allowance to allow for any delivery issues relating to the non developer led strategic sites, in particular Land East of Pyle (PLA5 and SP2(5)).

**f) How has the flexibility allowance of 20% been defined? And is it based on robust and credible evidence?**

8. Bellway are aware that whilst the current submitted Plan (SD1) provides for a 10% flexibility allowance there has been a fluctuation in the percentage since the Preferred Strategy stage.
9. It is noted that the Preferred Strategy (SD29a) initially proposed a 10% flexibility allowance to provide total housing provision of 8,333 dwellings. However, it was understood that this would be refined as part of the ongoing Plan process. This was in accordance with paragraph 5.59 of the Development Plan Manual (2020) in that *'The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced'*.
10. Consequently, a 20% flexibility allowance was outlined in the original Deposit Plan 2021, which resulted in a total housing provision of 9,207 dwellings. Clearly, at this point there was an acceptance by the Authority that a 20% flexibility allowance was justified (and even accepted), over and above the minimum 10% to ensure the delivery of the Plan and in accordance with paragraph 5.59 of the Development Plan Manual (2020) in that *'It will be extremely rare that all sites identified in a plan will come forward in the timescale anticipated. Whilst there is a need to improve certainty through frontloading, as described earlier in the Manual, there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. A development plan will not be effective if it cannot accommodate changing circumstances'*.
11. As noted in paragraph 7.14 of the Deposit Consultation Report (SD4), the 20% was a *'purposely large buffer, chosen specifically to enable the Replacement LDP's housing requirement to remain comfortably deliverable if a significant site failed to come forward as anticipated at that point of plan preparation'*.
12. In fact, the impact of a sound flexibility allowance was demonstrated at the Focussed Changes July 2022 review, where the Authority confirmed that the proposed rollover Allocation COM1(1) Parc Afon Ewenni was to be removed from the trajectory due to proposed Flood Map for Wales, and associated updates to Technical Advice Note 15 – Flooding. In effect, the site could no longer be relied on to contribute to the housing requirement and removed 675 dwellings.
13. In response, at the Focussed Changes Stage, Strategic Planning Policy Officers evidenced a 13% flexibility allowance, with a total housing provision of 8,590 dwellings. As part of this, Officers presented a proposed new Allocation at Heol Fach, North Cornelly (the site promoted by Bellway – 222.C1). The developer led site was considered, at the time, necessary for incorporation into the trajectory to provide a greater flexibility. The fact the site is being promoted for development by Bellway demonstrates delivery and that it is capable of being brought forward early in the Plan period helping reduce the reliance of the strategic sites and to assist in providing a deliverable Anticipated Annual Build Rate (AABR) after Adoption of the Plan.

14. The acceptability of the site, and the subsequent increase in the flexibility allowance to provide for the Allocation of the site is outlined in the Candidate Site Assessment (SD64), *'The candidate site is located on the periphery on North Cornelly which is identified as a Sustainable Growth Area (as defined by SP1). The site is well serviced by the Active Travel network which will help foster and promote transit-oriented development. The site is considered to be free of any significant constraints. As such this site is allocated for residential development in the Replacement LDP'*.
15. Furthermore, Deposit Consultation Report – Summary Document (SD3) highlights at paragraph 2.11 that at the *'Post Deposit Stage, the Replacement LDP has been refined to incorporate a significant 13% flexibility allowance. This will ensure the Anticipated Annual Build Rate (AABR) will remain deliverable throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur. The Council considers that the total level of housing provision is set appropriately within the Replacement LDP'*.
16. However, whilst the Candidate Site Assessment concludes that the site is in accordance with the LDP strategy, has passed all tests of assessment and proposed for allocation by Officers, Members of Cabinet deemed that the site was not required for allocation as they considered a 10% flexibility allowance is sufficient.
17. Bellway consider that the reliance on the minimum 10% flexibility allowance would be contrary to Test of Soundness 3 and has the potential to negatively impact the deliverability of the Plan, whilst also not allowing for a range and choice of dwellings which can be provided in the short term. This is a view clearly reflected by Officers as demonstrated at paragraph 2.11 of the Deposit Consultation Report – Summary Document (SD3).
18. As identified in the Housing Trajectory there is a drop in delivery between 2023/24 – 2025/26 post Adoption. However, the Allocation of the developer led Heol Fach, North Cornelly (Bellway – 222.C1), along with an increase the flexibility allowance (as previously confirmed acceptable by Officers) would assist in providing further certainty on delivery. This is especially relevant given paragraph 5.59 of the Development Plan Manual (2020) and the fact that currently only one Strategic Site is also developer led.
19. The confirmation of delivery was agreed at the Focussed Changes given the significant amount of assessments provided for the Candidate Site stages and the ongoing works to evidence the acceptability of the proposed Focused Changes Allocation. Bellway are able to maintain the previously proposed housing trajectory for providing housing by 2024/25, and are able to prepare and submit a detailed full planning application promptly if allocated.
20. This is also taken in the context of the under delivery of housing over the current Plan period. It is noted that there has been an annual shortfall in housing delivery against the Annual Average Requirement (AAR) method. It is understood that completions were 300 dwellings below what was anticipated for 2020/21 with a -46% shortfall (346 actual dwelling completions compared to an AAR of 646 dwellings).
21. In addition, the cumulative average annual housing requirement from the start of the plan period to 31st March 2021 was 9,690 units. However, the actual cumulative completions have been 6,770 dwellings, resulting in a -30% shortfall (2,920 dwelling shortfall) across the first four years of the plan period. This clearly demonstrates the need for a greater flexibility allowance in the plan to catch up over the remainder of the plan period.
22. Bellway conclude that Officers have previously confirmed the acceptability of a higher flexibility allowance, over the required 10% minimum, to allow certainty over the Plan period. The additional flexibility allowance can be accommodated by the developer led Heol Fach, North Cornelly (Bellway – 222.C1).

23. To accord with Test of Soundness 3 it is considered necessary to increase the flexibility allowance as well as Allocate the developer-led residential site at Heol Fach, North Cornelly (Bellway – 222.C1) within Plan Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1.

**Q3. Is the rate of delivery contained in the housing trajectory realistic, and based on robust and credible evidence?**

24. The level of deliverability in the housing trajectory has been informed by the promoters of the Strategic Sites and Allocations in conjunction with the Authority.
25. That said, Bellway are aware of only one developer led Strategic Site, with the others either being landowners or land promoters. It is noted that evidence has been provided regarding the sites, however, without the certainty of a developer at this stage, the proposed trajectory could be impacted as further due diligence is undertaken by any developer at the later stages.
26. Given that a landowners/land promoters trajectory is not necessarily the same as a developer then paragraph 5.59 of the Development Plan Manual (2020) is salient in that *'It will be extremely rare that all sites identified in a plan will come forward in the timescale anticipated. Whilst there is a need to improve certainty through frontloading, as described earlier in the Manual, there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. A development plan will not be effective if it cannot accommodate changing circumstances'*.
27. To provide surety and accord with Test of Soundness 3 it is considered necessary to Allocate the developer-led residential site at Heol Fach, North Cornelly (Bellway – 222.C1) within Plan Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1.

**Q4. 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?**

28. Bellway are aware of the developer led site allocations, with those providing certainty on the delivery. However, Bellway raise fundamental concerns regarding the allocation on land east of Pyle as raised in the detailed Regulation 19 representations previously provided. Notwithstanding Bellway's view that the allocation of 2,000 units is a matter of a SDP and not for consideration in the RLDP, it is evident that substantial work is required to demonstrate the ability to deliver the required infrastructure to enable the scheme to be delivered.
29. As outlined in response to Question 2(f) and Question 3, Bellway consider that there should be a greater flexibility allowance to allow for any delivery issues relating to the non developer led site allocations.

**b) Should committed sites be allocated? If not, what will happen to such sites if planning permissions lapse?**

30. Bellway consider that Committed sites should not be allocated, rather there should be an increase in the flexibility allowance to address such circumstances.

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

31. As outlined in response to Question 2(f), Bellway consider that with a minimum 10% flexibility allowance then any change in circumstance or delay in the strategic Sites and Allocations would

have detrimental impacts. Bellway consider that the appropriate remedy would be the increase in the flexibility allowance and the Allocation of Heol Fach, North Cornelly as a site which is developer led and could deliver housing in the early stages after Adoption.