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**Representor ID: 1165**

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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  
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CF31 4WB

Dear Sir / Madam,

**BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN EXAMINATION**

**RESPONSES TO MATTERS AND ISSUES - MATTER 13: GOOD DESIGN AND SUSTAINABLE PLACEMAKING – STRATEGIC ALLOCATION AT LAND EAST OF PENCOED (PLA4 AND SP2(4))**

Please find enclosed, on behalf of, and under instruction from the landowners, and promoting party Caradog Ltd., submissions to the Examination of the Local Development Plan (LDP) in relation to Land off Penprysg Road, Pencoed (Site Ref. 87.C1).

This submission comments on matters and issues raised by, and set out in, the Inspectors' Matters and Issues Agenda to cover Matter 13: Good Design and Sustainable Placemaking – Strategic Allocation at Land East of Pencoed (PLA4 and SP2(4)).

We look forward to attending the Hearing Session in respect of Matter 13 in due course. In the meantime, we hope and trust that all is in order with this submission. Please do not hesitate to contact us in the event that further information is reissued or 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 Matter 13: Good Design and Sustainable Placemaking – Strategic Allocation at Land East of Pencoed (PLA4 and SP2(4)).

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 Caradog Ltd (Representor ID. 1165) 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.

It is important to note from the outset that the Representor does not object to the inclusion of Land East of Pencoed (PLA4 and SP2(4)), or to any of the Strategic Sites included in the RLDP. Rather, the Representor would raise concerns that this is the sole and only housing allocation in the key Tier 2 settlement of Pencoed. As a result, the Representor would ask the Inspector to consider this site (Ref. 87.C1) as an appropriate allocation for housing if there are considered to be any issues with the deliverability of any of the allocated housing sites (both strategic and housing allocations).

## **Questions**

*Issue – Is the allocated Strategic Development Site soundly based and capable of delivering new residential and community development over the Plan period?*

### ***c. What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?***

The Representor would refer to their previous representations, with the site presenting some key constraints. It is noted that the Masterplan for the site currently accounts for these constraints within the unit numbers and phasing, and further supporting information has been submitted in order to address some of the technical issues on the site. As a result, this allocation has been scrutinised and held to be sound.

Notwithstanding this, the Representor would raise concern regarding the possible overreliance on this strategic site to deliver numbers in Pencoed. Any development opportunities to the west of Pencoed are limited given the lack of accessibility through the settlement of Pencoed and the location, and constraint posed by of the railway line and crossing. These factors place a large pressure on the strategic site's performance deliverability - given the little scope for other sites to come forward, it is considered that the allocating the Representors site (Site Ref. 87.C1) would relieve any pressure from Land East of Pencoed to deliver all of the necessary need for the area and this key settlement and provides a suitable site in this location.

### ***e. Are the number of residential units proposed realistic and deliverable over the plan period?***

Firstly, it should be noted that the Representor supports the overall housing numbers allocated within the plan in Policy SP6. The Representor notes that, in relation to Land East of Pencoed, the total site capacity as indicated on the Housing Trajectory (Appendix 1) has been increased from 770 units to 804 units. Moreover, the first phasing of housing has been delayed by 1 year (now 2026 – 2027). Whilst, unit numbers have been increased for 2026 – 2027 and 2027 – 2028 in order to accommodate the necessary number in the plan.

It is noted that Pencoed is a Tier 2 settlement and identified as 'Sustainable Growth Area'. However, whilst one of the largest settlements in the Plan, there is only one housing allocation attributed to it. As a result, the Representor would submit that the site would assist in the delivery of housing and affordable housing targets as set out for Tier 2. This could assist in off-setting any lack / delay of delivery elsewhere in the Plan – for example, the removal of Parc Afon Ewenni (Previously Site Ref. COM1) which has resulted in 675 units being removed from the Plan. The Representor's site could deliver between 100 – 270 units (full details of site included in previous representations).

Given the above, there is a need to aspire to a higher level of housing provision (affordable housing in particular – the need for which will not be met by the Plan's allocation), and it is important that the level and choice of / options for growth attributed to each settlement (particularly key sustainable settlements) is reasonable. The Plan places a reliance on brownfield strategic sites meeting a large proportion of the Plan's growth including the affordable housing target. Accordingly it is considered that other sites, such as the Representor's site (Site Ref. 87.C1) would present a useful opportunity to secure further numbers in the plan period, on a site which is suitable and deliverable.

***f. How and when will the proposed new educational facilities be delivered?***

There appears to be no details regarding the proposed phasing of the delivery of the education facilities (1.5 FE Primary School) on the site within either the Policy or the Housing Trajectory (Appendix 1) which provides timing and phasing of allocations. Given that this is proposed to be located on existing play space, it is also unclear as to the implications that this would have on delivery and timescales.

***g. What are the mechanisms and timescales for delivering the site?***

The site's anticipated delivery of housing and other infrastructure is based on the revised Housing Trajectory. As referenced above, there is also no timing / trigger for the educational provision (and delivery of this is presumably only possible with the relocation of the current playing fields). Moreover, given the number of technical constraints on the site, it is reasonable to assume that there may need to be various further technical work and / or measures to be put in place on the site in order to facilitate delivery. It is therefore likely that this has impacted the timing of the site to come forward, with the first phasing of housing delayed by 1 year to start delivering units between 2026 – 2027.

***h. Is the allocation of the SDS essential to ensure the soundness of the Plan?***

The updated housing numbers for SP2(4) provide for 804 total dwellings in the LDP Plan period. As such the site accounts for nearly the complete total housing provision of the overall policy requirement for Pencoed (891 units in Pencoed as set out in the Table 7: Summary of Spatial Distribution of Housing).

There is no objection per se to the inclusion of just one strategic site in a growth area. Notwithstanding this, the Representor would submit that, given Pencoed is a Tier 2 settlement a 'Sustainable Growth Area', there would be scope to have further allocations with this Growth Area to support the overall housing numbers in the Plan. The Representor's site would support delivery of housing and affordable housing in Tier 2, and could assist in off-setting any lack / delay of delivery elsewhere in the Plan.

The removal of Parc Afon Ewenni (Previously Site Ref. COM1) from the Plan has resulted in 675 units being removed from the Housing Allocations (Policy COM1) to deliver Policy SP6. The Representor's site has the ability to deliver between 100 – 270 units (full details of site included in previous representations). Moreover, it is noted that the Plan's target for Affordable Housing has been amended to reflect the updated housing trajectory information and has been reduced from 1,977 to 1,595. As such, the allocation of the Representor's site provides an opportunity to account for any shortfall in this regard.

To confirm, the Representor's site was previously considered as acceptable and passed the first Candidate Site Assessment stage by the Council. The site was discounted at a later stage due to highways issues and education capacity issues. However, these are not considered fundamental technical constraints to the delivery of the site and could be overcome through agreement to suitable improvements to highways and contributions to education facilities in the local area. As such, the site should be reconsidered as a possible allocation in order to provide further scope for delivery of housing and affordable housing in the Plan period to support both Pencoed and the Plan as a whole.

As set out above, there appears to be a continued over reliance on brownfield strategic sites within the Plan. Although the Representor is not objecting to this approach, it is considered that the reliance should not prevent other suitable housing sites to come forward as this will ultimately assist and support providing further level of housing in Sustainable Growth Areas.