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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 – MATTER 14: GOOD DESIGN AND SUSTAINABLE PLACEMAKING – STRATEGIC ALLOCATION AT LAND EAST OF PYLE (PLA5 AND SP2(5))**

Please find enclosed, on behalf of, and under instruction from the landowners and promoting parties; Mr Hywel Thomas, Mr John Knight, Ms Jane Naylor, and Mr & Mrs Grant, a submission to the Examination of the Local Development Plan (LDP) in relation to strategic 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 Matter 14: Good Design and Sustainable Placemaking - Strategic Allocation at Land East of Pyle (PLA5 and SP2(5)).

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 Matter 14: Good Design and Sustainable Placemaking - Strategic Allocation at Land East of Pyle (PLA5 and SP2(5))

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

### ***a. What is the current use of the Strategic Development Site (SDS)?***

The SDS is within the joint ownership of the site promoters, and (as set out in LDP supporting para.'s 5.2.30 and 5.2.31) comprises nearly 100 hectares split into two parcels (circa. 60 and 40 Ha) divided by and either side of the A48 corridor. The site is primarily greenfield, and used for farming, specifically grazing. The site also includes some existing agricultural buildings to the east.

### ***b. What is the proposed use of the SDS?***

As set out in Policy PLA5 (as set out in LDP supporting para 5.2.32), the SDS is allocated for a comprehensive, residential led mixed-use development. The site will ultimately deliver circa 2,003 homes, with 50% (1033) of the units coming forward over the Plan period. 15% / 300 of the units will be affordable housing units. The scheme will be based on strong Placemaking and green infrastructure principles, and will incorporate 2 x two form entry primary schools, leisure and recreation facilities, public open space, plus appropriate community facilities and commercial uses.

The site will be a well-connected, positively integrated, sustainable urban extension to the Tier 2 settlement of Pyle, North Cornelly and Kenfig Hill.

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

As an accessible, greenfield site, with limited relative topographical change, there are no fundamental constraints affecting the site which could represent obstacles to development and adversely impact delivery.

The site has been subject to rigorous deliverability and viability assessment as part of the allocation process, which has seen detailed technical survey and assessment work undertaken akin in volume, nature, and scope to the requirements for an outline planning application. This 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);
- Review of the Proposed Footbridges over the Railway Line (RVW Consulting, 2020); and
- Land and Housing Numbers Paper (The Urbanists, 2022).

Respectively and cumulatively, the reports, which have been subject to scrutiny by BCBC and statutory parties, have concluded that there are no material reasons as to why the site cannot be developed. The costs for all recommended mitigatory measures have been incorporated into the viability appraisal (as further discussed below).

The Land and Housing Numbers Paper (2022), accompanied by an Illustrative Masterplan and Density and Accommodation Strategy, has been developed and refined following the extensive survey work undertaken and statutory consultee feedback and input. The masterplan demonstrates that the site can suitably accommodate all necessary highways, drainage and green infrastructure etc. without impacting upon development capacity. Moreover, it has been developed on the basis of an appropriate Net Developable Area (NDA) – 60% ratio of net to gross – to account for material considerations, such as some minor peripheral flood risk.

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).

Given the above, the site is evidently free from any significant constraints which could represent significant obstacles to development within the Plan period. The robust deliverability and viability assessment has had regard to all material considerations. The SDS is wholly suitable for an allocation accordingly, and the site promoters strongly support the continued inclusion of the allocation within the Plan.

***d. In light of the constraints, and having regard to the need to provide affordable housing, is SDS economically viable?***

The site has undergone a robust viability assessment through completion of the Burrows-Hutchinson Development Viability Model (DVM). This has taken into account all known costs, including land, community infrastructure (on site and financial contributions), physical infrastructure, housing construction, construction contingency, sale letting and marketing costs, and finance costs. The DVM has been completed on the basis of 15% affordable housing being provided (in accordance with Policy PLA5).

BCBC and Andrew Burrows have scrutinised the DVM, which evidences that the site is inherently economically viable. Moreover, considerable and unprecedented market interest in the site has been expressed, with a lengthy and extremely competitive selection process embarked on. This process has

sought to ensure deliverability, viability, and quality – with an emphasis on ensuring placemaking is at the heart of any proposal.

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

The number of residential units the site is to be yielded over the plan period (1033 units – refer to extract of housing trajectory below) is wholly realistic and deliverable. This is the case not least as (as mentioned above), all strategic sites have been through demanding deliverability and viability exercises to a higher degree than other allocations:

*"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).

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	70	150	150	150	150	150	150	150	1033

The rigorous assessment work and scrutiny has concluded that there are no fundamental constraints which cannot be overcome and could inhibit delivery. Moreover, considerable interest in the site has been received from numerous parties, with the preferred party in the process of being selected, and the next stage of the planning promotion process (pre-application dialogue and a planning application) to be commenced imminently. This will build on the considerable and comprehensive survey and assessment work that the multi-disciplinary consultancy and agency team assembled to evidence and advise to date has undertaken.

The delivery trajectory assumes adoption of the Plan is to occur in 2023-24, and identifies a first yield of units (70) in the year 2026-27. This provides for, and represents, an inherently realistic and achievable 'lead in' time to first yield. In terms of the following years (2027-28 onwards), 150 units per annum is an entirely representative build rate for a strategic site of this scale, and one which is proportionate to the yield rate adopted for other strategic residential allocations. This rate assumes sales from more than one outlet on the site throughout the overall development period – which is commonplace for sites of scale. It is therefore clear that the site can comfortably yield in accordance with the trajectory.

A Statement of Common Ground between BCBC and the other SDS promoters has been signed by the SDS Representor, in order to reaffirm unanimous support for the RLDP and all of the strategic sites therein. All parties to this Statement confirmed that the strategic allocations are considered sustainable, viable and deliverable in accordance with the submitted housing trajectory. Moreover, the phasing and delivery of units for each site were confirmed as appropriate and agreed.

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

Strategic allocation PLA5 includes 5.7 hectares of land to accommodate 2 x two form entry primary schools with co-located nursery facilities, in addition to a financial contribution to nursery, primary, secondary and post-16 education provision. The timing and phasing of the financial contribution will be secured through a Section 106 agreement, in accordance with the Education Facilities and Residential Development SPG.

With regards to the on-site educational facilities, and other community infrastructure elements and provision, these will be phased and delivered throughout the scheme. The known requirements for such community infrastructure have been phased in the Development Viability Appraisal prepared for the site, with financial contributions throughout the scheme's delivery, whilst on-site provision being phased and timed relation to units delivered and other community infrastructure provision.

It is proposed that the provision of community infrastructure throughout the scheme will follow a placemaking approach – creating the 'place' at an early stage. Community infrastructure provision will be key to this.

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

Considerable and unprecedented market interest in the site has been expressed, with a lengthy and extremely competitive selection process embarked on. This process has sought to ensure deliverability, viability, and quality – with an emphasis on ensuring placemaking is at the heart of any proposal. The preferred developer party (who will deliver the site) is to be selected imminently. The next stage of the planning promotion process (pre-application dialogue and a planning application) is to be commenced imminently and is an integral part of the selection process / criterion for selection of the developer. This will build on the considerable and comprehensive survey and assessment work that the multi-disciplinary consultancy and agency team assembled to evidence and advise to date has undertaken.

An indicative planning programme for the SDS has been developed by the Representor, in collaboration with the site promoters and BCBC. The programme will ultimately result in commencement of development slightly ahead of the trajectory, to ensure a yield of 70 units in the first year of delivery (2026-27), and the remainder of the 1033 in the Plan period after that.

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

Policy SP1 seeks to apportion growth primarily to the Tier 1 and Tier 2 Settlements in accordance with the LDP spatial strategy. 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 the SDS, the Tier 2 settlement of Pyle, Kenfig and North Cornelly comprises 13% of these units (i.e. 1,106 of 8,335 units over the plan period). There is an acute identified housing need within this settlement cluster. Such need would otherwise not be met if the site were not to be allocated, whilst the site's contribution to the Plan as a whole is considerable – it being the single largest strategic site. The SDS is available, deliverable and viable – as has been evidenced through submissions to BCBC made to date.

The importance of the strategic sites in achieving the LDP Vision and Objectives is acknowledged within the amplification text to Policy SP2 (Regeneration Growth Areas and Sustainable Growth Area Strategic Allocations) para. 4.3.65: "*The sites within SP2 are considered **essential to delivery of the LDP...***" (GJP emphasis added).

The scale of the SDS means its allocation is critical if the Plan is to meet the identified housing need of 7,575 units through sustainable growth. The LDP would therefore be severely limited, and by association, would be unsound, if PLA5 was removed as an allocation.