



**Geraint John Planning**

Geraint John  
E: geraint@gjplanning.co.uk  
T : 02920 105360

Office 16, House 1, 2<sup>nd</sup> floor  
The Maltings  
East Tyndall Street  
Cardiff, CF24 5EA  
[www.geraintjohnplanning.co.uk](http://www.geraintjohnplanning.co.uk)

**Representor ID: 1165**

14<sup>th</sup> February 2023

**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 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 party a Caradog Ltd., submission 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 2: Active, Healthy, Cohesive, Inclusive and Social Communities – Housing and Greenspace.

We look forward to attending the Hearing Session in respect of Matter 2 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 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 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.

## **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?**

- b. How has the requirement figure of 7,575 been derived? and is it based on robust and credible evidence?***
- c. In identifying the requirement figure, has adequate regard been paid to the most recent Welsh Government household and population projections?***
- d. Have alternative housing growth scenarios been considered? if so, why have they been discounted, and why has the preferred option been chosen?***
- e. 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”.

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

**2. 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?**

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 latest housing land supply figure is made up of dwelling completions (to date), land bank commitments, windfall sites, and new housing allocations.

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. This is the case, not least as they have already been ‘rolled’ over from the existing LDP.

As stated in the Plan, the delivery of the identified housing requirement is pivotal to the effectiveness of the LDP, and as such, the omission of ‘Long-Term Regeneration’ Sites ensures that new deliverable sites come forward in the Plan period.

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

The Representors confirm that there is no objection to Policy COM1 (Housing Allocations), in principle, and welcome the LPA’s approach to focus the delivery of strategic sites and larger housing allocations.

However, it is considered that there is an over-reliance within the Plan on the delivery of strategic sites on previously developed land (PDL). The over-reliance of these sites brings with it enhanced / greater risk in the delivery of the overall housing supply in the Plan period, given the constraints associated with PDL to yield dwellings on site.

The removal of housing allocation ‘Parc Afon Ewenni’ (COM(1)) is evident of the risk highlighted above in delivering the total quantum of units within the Plan period on PDL sites. In addition, strategic site ‘Porthcawl Waterfront’ (SP2(1)) has seen a reduction in the total number of units to be delivered in the Plan period, since Deposit stage, with a higher number to be delivered beyond the LDP period. The changes undertaken since Deposit reflect and demonstrate the uncertainty and risk associated with the allocation of large sites on PDL to deliver dwellings within the Plan period, given the constraints to overcome to yield residential units.

The Representor considers that there is a continued over-reliance on large PDL sites coming forward in the Plan period, and that there should be greater provision for greenfield sites, to ensure that the overall housing target is met.

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

The rate of delivery contained in the housing trajectory has been adjusted, since Deposit stage, to reflect the latest evidence regarding the deliverability of the allocated sites. Specifically, it is acknowledged in the trajectory that the delivery of sites has moved 12-24 months, to account for the expected / latest timescales to yield units on site. Notably, sites on PDL (i.e. regeneration) are identified to be delivered later in the Plan period, whereby greenfield sites will bring forward development earlier in the Plan.

**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 general, it is considered that the Plan will deliver the housing requirement (7,575 dwellings) over the period, however, it is considered that the affordable housing target of 1,595 is lower than the 5,134 units identified in the Local Housing Market Assessment (2021) to meet local need in the Plan period. As such, there is a large discrepancy between the two figures, and it is contended that affordable housing need not will be met within the Plan period.

In terms of new housing allocations, 951 affordable homes are identified to be delivered on allocated sites within the Plan period. At Deposit stage, 1,341 units had been allocated on residential sites, however, this number has now been reduced to 951. Therefore, it is questionable as to whether this revised figure will contribute considerably to the overall identified need within the Plan period.

The Plan should, as an aside from the above, ensure that other sufficient mechanisms are in place to deliver affordable housing over and above the 1,595 supply figure, so as to contribute to meeting the overall LHMA need identified. This would ensure that any shortfall is minimised where possible within the Plan period, and the overall need met as much as possible

**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.'*

However, in respect of affordable housing, the provision identified is lower than the LHMA target, which is based purely on supply, with no flexibility allowance to account for market changes, on site constraints, funding issues etc. As such, it is contended that the affordable housing strategy is insufficiently flexible to respond to changing circumstances in the Plan period. The identification of additional sites would assist in this respect.

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 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.

The LDP acknowledges that there is a need to direct some development to other settlements in order to maintain sustainable communities. For instance, para. 4.3.50 states that *"it is recognised that other settlements in the County Borough will be required to accommodate smaller scales of future development and growth in accordance with the Settlement Hierarchy. This is important in order to maintain sustainable communities, in line with their role and function, to achieve the LDP's Vision and Objectives."*

If any adjustment is considered necessary or beneficial then small-medium sites in Tier 2 Settlements are warranted / 'best fit' for new allocations.