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Representor ID: 287

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By Email: ldp@bridgend.gov.uk ; 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 (BPM Technology Corp), a submission to the Examination of the Local Development Plan (LDP) in relation to housing allocation ref. COM 1(3) – Land South of Pont Rhyd Y Cyff.

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 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 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 BPM Technology Corp Ltd (Representor ID. 287) 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 parts (a) – (d) 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?

a. 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.

As stated in the Deposit Plan, the delivery of the identified housing requirement is pivotal to the effectiveness of the LDP, and as such, the exemption 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 site promoter recognises that the Strategic Development Sites have been selected in order to ensure the implementation of the Growth and Spatial Strategy, by directing growth primarily to Sustainable Urban Extensions. The LDP outlines that Sustainable Urban Extensions are *“necessary to create sustainable communities that will incorporate a mix of complementary uses and deliver improvements to existing infrastructure and/or provide new infrastructure.”*

Notwithstanding this, it is not considered that the Plan is over reliant on the delivery of the Strategic sites. All sites allocated under Policy SP2 (Regeneration Growth Area and Sustainable Growth Area Strategic Allocations) have been subject to rigorous viability and deliverability assessment in collaboration with site promoters.

480 dwellings are to be delivered on the non-strategic sites, including COM1(3), which is allocated for 102 dwellings. The non-strategic sites are generally able to deliver units earlier on in the Plan period – as reflected in the housing trajectory (Background Paper 4).

It is clear therefore that strategic and non-strategic sites each have their own merits, but that both together are essential to the delivery of the Plan, and the site promoter is wholly supportive of this approach accordingly.

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

The Representer considers that COM1(3) – Land South of Pont Rhyd-y-Cyff could deliver earlier in the Plan period. Referring to the housing trajectory (as extracted below), the site is scheduled to come forward for development in 2025/26, a year later than the other two related allocations in Pont Rhyd-y-Cyff: COM1(2) and COM1(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		
Pont Rhyd-y-cyff (Maesteg and the Llynfi Valley Regeneration Growth Area)	Land South West of Pont Rhyd-y-cyff	130	Pre-application: 6 weeks PAC: 6 weeks 4 weeks minimum with a period of 2 weeks to collate and produce a PAC report per phase)	10 weeks	8 weeks				0	0	0	0	0	0	10	45	45	30	0	0	0	0	0	0	0
Pont Rhyd-y-cyff (Maesteg and the Llynfi Valley Regeneration Growth Area)	Land South East of Pont Rhyd-y-cyff	140	Pre-application: 6 weeks PAC: 42 days (28 days minimum with a period of 14 days to collate and produce a PAC report per phase)	10 weeks	8 weeks				0	0	0	0	0	10	25	40	40	25	0	0	0	0	0	0	0
Pont Rhyd-y-cyff (Maesteg and the Llynfi Valley Regeneration Growth Area)	Land South of Pont Rhyd-y-cyff	102	Pre-application: 6 weeks PAC: 6 weeks (4 weeks minimum with a period of 2 weeks to collate and produce a PAC report per phase)	10 weeks	8 weeks				0	0	0	0	0	0	15	25	25	37	0	0	0	0	0	0	0

COM1(3) could also be delivered in the year 2025/26, or even earlier in the Plan period. As has been demonstrated through the representations to date, the site is free from constraints and is a parcel of previously developed land – which is more preferable for new development, as outlined in PPW 11. No significant work is required to remedy the site for development, and as such, it is available now to yield much needed housing in the short-term.

This notion was accepted by BCBC within the Candidate Site Assessment Report (2021), where they confirmed that the site would not require as long lead in times as other sites in Maesteg and the Llynfi Valley – as set out below:

'Whilst there are a number of large regeneration sites in Maesteg and the surrounding parts of the Llynfi Valley that could accommodate mixed used development, these sites possess several constraints that need to be overcome (notably contamination and viability of sites) and will require longer lead in times than others for delivery to take place.'

As such, it is considered entirely appropriate and feasible for the site to be phased earlier within the Plan period. Moreover, the site promoter and landowner, BPM Technology Corp, is currently mobilising for a pre-application enquiry, and subsequent planning application. Interest in the site has also been registered by a number of parties.

It is therefore suggested that the site should be delivered earlier within the Plan period, and the housing trajectory in respect of COM1(3) revised accordingly.

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 COM1(3), the site is available for development – it is vacant and within the sole ownership of the site promoter, BPM Technology Corp. The Development Viability Model submitted evidence submitted confirms that the site is economically viable.

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 a Transport Assessment (Asbri Transport, October 2020) and Ecological Appraisal Report (I&G Ecological Consulting, April 2020), the latter of which has been recently updated February 2023) in anticipation of a pre-application enquiry being progressed. Respectively, these reports have concluded that there are no material reasons from a highways and transportation or ecology perspective as to why the site could not be developed in any event.

The testing layout (ref. 001 Rev A, prepared by The Urbanists) also submitted to BCBC demonstrates that the site can suitably accommodate all necessary highways, drainage and green infrastructure etc. without impacting upon development capacity.

BCBC drew the following conclusions on the site (previously known and referred to as 'Former Four Sevens Service Station, no. 287.C1): within the Candidate Site Assessment Report (2021):

*'The candidate site is located on the edge of Pont Rhyd y Cyff, which is identified as a 'local settlement' where new development should be contained within the existing settlement boundary. The site (Brownfield) collectively with candidate sites 305.C7 and 325.C1 offers an opportunity for a sustainable urban extension to the existing settlement of Pont Rhyd y Cyff. **Whilst there are a number of large regeneration sites in Maesteg and the surrounding parts of the Llynfi Valley that could accommodate mixed used development, these sites possess several constraints that need to be overcome** (notably contamination and viability of sites) and will require longer lead in times than others for delivery to take place. **Extension to the settlement boundary of Pont Rhyd y Cyff would enable sustainable development with close proximity and accessible active travel links to the town centre of Maesteg, providing access to a wide range of facilities, services and key supporting infrastructure e.g. Garth railway station. Development in this location would also foster closer integration between Ysgol Gyfun Gymraeg Llangynwyd and the settlement of Pont Rhyd y Cyff.**' [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 COM1(3). 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 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."*

Whilst considered a Tier 3 settlement, 'Pontrhydycyff, Llangynwyd and Cwmf' scored reasonably highly in the Sustainability Assessment (2018, Revised 2021), ranking 12 out of 22 settlements assessed on various indicators of sustainability.

The allocation of sites within the Local/Tier 3 settlement group of Pontrhydycyff, Llangynwyd and Cwmfelin, specifically COM1(3), is therefore considered appropriate and wholly consistent with the identified settlement hierarchy.

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"* (Para 5.3.37).

Any development of the allocated sites would conform to the requirements of Policy COM6. The allocations have been tested through a rigorous exercise to demonstrate that appropriate densities can be achieved. With regards to COM1(3), the testing layout (ref. 001 Rev A, prepared by The Urbanists) illustrates that a sustainable high density (68 dwellings per hectare) can be achieved on the basis of an indicative housing mix, which accords with the requirements of the Local Housing Market Needs Assessment (2021) and Policy COM3 (On Site provision of Affordable Housing).