

BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)

MATTER 12: GOOD DESIGN AND SUSTAINABLE PLACEMAKING – STRATEGIC ALLOCATION AT LAND EAST OF PYLE (PLA5 AND SP2(5))

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 12: Good Design and Sustainable Placemaking – Strategic Allocation at Land East of Pyle (PLA5 and SP2(5)).
2. This Matter Statement should be read in conjunction with previous responses prepared by Boyer:
 - Regulation 19 Submission (July 2021)

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?

3. Bellway previously provided a detailed response on this matter as set out in the Regulation 19 submission providing significant objections which remain and therefore does not repeat the full assessment. Rather the main concerns are outlined below.
4. One of the most significant constraints as previously raised, relates to land ownership as well as having no known developer/house builder attached to the Strategic Site. Bellway raise concern over the deliverability of 970 dwellings in the Plan period, without any early engagement or confirmation from developers that the timescales are achievable.
5. This is also linked to the sheer scale of the site in total. With the remaining 1,033 dwellings outside of the Plan period the total amount of development proposed at the site exceeds 2,000. Bellway consider that level of development is a strategic issue which should be considered comprehensively through a Strategic Development Plan (SDP).
6. Given the scale and the site specific location there are also a number of infrastructure concerns related to deliverability. Regarding transport infrastructure the proposed development requirements include new shared footways, cycleways and improved crossing facilities along the A48 and A4229, along with highway improvements to enhance pedestrian safety in the vicinity of the site. A new pedestrian and cycle bridge would be required over the existing railway line and along A48/Pyle Road to provide safe pedestrian and cycle linkages between the site and Pyle.
7. These are major elements of infrastructure that need to be delivered and have significant implications both financially and in deliverability.

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

8. Bellway are aware, as with all Strategic Sites and Allocations, that the site will have been subject to a detailed viability assessment. Whilst Bellway do not have access to this information in order to respond, it is important to highlight that the site does not have any known developer on board.
9. Bellway does highlight that there is a 0% target affordable housing contribution identified for Pyle, Kenfig Hill and North Cornelly Housing Market Area (HMA) under Policy COM3 and that the allocation for land East of Pyle has a 15% target affordable housing contribution which have been identified having regard to the Local Housing Market Assessment, the Plan Wide Viability Assessment and site specific viability testing. However, Bellway have confirmed with Officers that the site at Heol Fach, North Cornelly can support a 20% affordable housing provision if allocated.
10. Moreover, given Bellway's commitment to the Heol Fach, North Cornelly site, those affordable homes are deliverable within the early stages of the Plan post Adoption. Not something that all strategic sites or allocations can confirm.

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

11. As identified in the previous Regulation 19 response, Bellway raised concern regarding the deliverability of the strategic site. At that point the housing trajectory set out 1,057 homes being delivered in the Plan period with homes being completed at the beginning of 2025. Clearly this was unrealistic.
12. The current submitted Plan (SD1) has amended this to reflect a delivery of homes on site in 2026/27 with 970 being provided through the Plan period and 1,033 proposed beyond the Plan period.
13. Whilst the delivery start date has been amended and the numbers for the Plan period reduced, Bellway still do not consider it appropriate to allocate housing of this scale across two development plan periods.
14. Furthermore, Bellway conclude that in light of the unknown costs of infrastructure requirements, no known developer on board and the significant amount of works required to enable development then Bellway question the realistic delivery of 970 dwellings over the Plan period.

g) What are the mechanisms and timescales for delivering the site?

15. Bellway reiterate again that without a developer on board it is difficult to provide surety on the mechanisms for delivery, in particular the planning applications. There is a significant amount of works and infrastructure required to allow the technical start of the site and unless this work is commenced now then it is difficult to see how the housing trajectory will be met.
16. In contrast, Bellway are a respected and reputable house builder with extensive experience in South Wales and can progress immediately with a full planning application at Heol Fach, North Cornelly. The detailed assessments already undertaken outline the acceptability and deliverability of the site.
17. Further matters regarding delivery are addressed in response to Question (c) and (e).

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

18. Bellway strongly object to the inclusion of land east of Pyle being allocated and included within the RLDP. It is clear to Bellway that there are fundamental questions which remain unanswered regarding the allocation on land east of Pyle. 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 evident that substantial work is required to demonstrate the ability to deliver the required infrastructure to enable the scheme to be delivered.

19. On this basis, the inclusion of Policy PLA5 results in the RLDP being unsound as it fails Test 3 of the Council's own Test of Soundness which are reflected in Section 64(2) of the 2004 Act and the Development Plans Manual. As detailed above, the proposed allocation will not deliver and it not realistic or appropriate and is not founded on a robust and credible evidence base.