

Replacement Bridgend Local Development Plan Examination Statement



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SUBJECT	Hearing Session 2: Active, Healthy, Cohesive, Inclusive and Social Communities – Housing and Greenspace
CLIENT	Llanmoor Development Co. Ltd (Castle Meadows, Coity)
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1. INTRODUCTION

This Statement has been prepared on behalf of our Client Llanmoor Development Co. Ltd to provide further comments in respect of some of the Matters for discussion at Hearing Session 2: Active, Healthy, Cohesive, Inclusive and Social Communities – Housing and Greenspace.

As requested, we do not intend to add to our comments already made and will rely on the Inspector taking those views and comments into account as part of their consideration of the Plan; specifically our comments within the following submissions:

- Preferred Strategy – dated 6th November 2019
- Deposit RLDP Stage – dated 27 July 2021

We would, however, seek to supplement our comments in respect of Bettws' position within the Settlement Hierarchy and therefore specifically Question 2 (f) – *'How has the flexibility allowance of 20% been defined? And is it based on robust and credible evidence?'*

2. QUESTION 2(f) – FLEXIBILITY ALLOWANCE

Bridgend have historically suffered from slower than expected delivery of housing on larger strategic sites. This isn't necessarily an issue just for Bridgend, it is an issue that most Councils have to grapple with when determining how to deliver their housing need.

As outlined within our Deposit RLDP comments, other Councils within the Region, namely Cardiff, in reviewing their LDP's have acknowledged that the reliance on larger strategic allocations without sufficient smaller sites to deliver on their housing need has results in a slower than expected delivery of housing. Such an example is entirely relevant to the proposed Bridgend RLDP.

Bridgend's strategy is to deliver a significant proportion of their housing numbers through strategic sites. This strategy has moved on a little from their original LDP which also included larger strategic sites but with greater emphasis on brownfield sites. Notwithstanding this, as set out within their LDP Review Report (Appendix 2), their strategic sites,

including those on greenfield land were slower than expected in coming forward. The question, therefore, is whether sufficient smaller sites have been identified and allocated to ensure that Bridgend housing delivery is 'ticking over' and assisting the Council in meeting its trajectory.

Dealing with such matters can reasonably be done through an appropriate flexibility allowance. Bridgend confirm within their Housing Trajectory background paper submitted as part of the Examination Documents that *"An appropriate allowance has been specified following assessment of each component of housing supply to ensure there is sufficient flexibility above the housing requirement to account for non-delivery and unforeseen issues, demonstrating delivery of the Anticipated Annual Build Rate (AABR) throughout the plan period"*. Such a provision is consistent with the Development Plans Manual para. 5.59.

It is also noteworthy that WG Guidance states that Flexibility allowance should be determined on each local circumstance and issues.

Within the original Preferred Strategy, Bridgend initially indicated a flexibility allowance of 10%, however, it was acknowledged and made clear in the Background Paper 4: Housing issued as part of that Consultation that *"This allowance has initially been set at 10%, although will be subject to refinement as more detailed site viability and deliverability work is completed and the housing trajectory is further developed."* (para7.2).

Subsequently, in consulting on their Pre-Deposit Version of the Plan, the Authority included a 20% allowance. As outlined above, this would have been set having undertaken further consideration of the local issues and refinement and assessment of the sites proposed to be included to allow the Authority to meet their housing trajectory. The documentation available provides limited information as to why the figure of 20% was identified, however, it would appear to have been set at this level to address the potential loss of one key strategic sites – Parc Afon Ewenni.

Following the release of new flood maps as part of a revised TAN 15 it became clear that Parc Afon Ewenni would not be capable of being allocated. It was removed from the Plan and the flexibility allowance reduced to 13% and was presented as such at the Cabinet meeting in July 2022. There was little justification included within the Report to Cabinet for the 13% figure. At the meeting, Cabinet resolved to lower the figure further to the minimum 10% on the basis that the other sites would deliver as expected and therefore there was no local issues that might require additional flexibility in the Plan.

It is noteworthy that the numbers proposed as part of the Parc Afon Ewenni site have not been replaced in the Deposit version of the RLDP – which leaves the Authority in a vulnerable position in terms of delivering on its housing numbers.

Given the experiences of other Council's, such an approach of reducing the flexibility allowance and not replacing the housing lost is considered to be extremely short sighted. It is noteworthy that in the first 10 year period of the Cardiff LDP only 40% of the expected housing from large strategic allocations were delivered. We are now into the fifth year of the BCBC RLDP and to-date nothing has been delivered and no applications submitted for sites.

The Housing Trajectory sets out in detail the likely delivery of housing across all allocated sites. It is noted that a 14 weeks allowance is made for planning applications for each phase and then 8-weeks for determining Discharge of Conditions. Our experience of most Authorities, and particularly in Bridgend, is that these timeframes are highly optimistic and are unlikely to be achieved. Most Council Planning Departments, along with their consultees are incredibly short staffed and applications are taking far longer than expected to determine. In most instances it is taking months rather than weeks to discharge relatively simple conditions. The recent report by the RTPi confirms that staffing levels at LPA's are critical and moral is also at low levels. It is evident therefore that Development Management teams are struggling to determine applications in the target timeframes.

It is acknowledged and accepted that these larger sites are required to deliver much needed infrastructure in the areas they're proposed, however, a greater flexibility allowance within the Plan should be included to help manage such scenarios. Such a flexibility allowance should be in the region of that originally stipulated by BCBC i.e. 20%. In addition, in our view this flexibility allowance should consist of a range of predominantly medium/large windfall sites to allow a good turnover of housing delivery. These sites will come up against similar issues in terms of determination, however, their complexities are such that they ought to be far quicker to determine than the strategic sites.

The latest Census figures show Bridgend as being one of the fastest growing areas in Wales, growing at a rate of 4.5%. This is just short of Cardiff which saw a growth of 4.7%. The Council therefore needs to ensure that they deliver on the housing needs of this new population. It can not rely on all of the allocated sites coming forward as planned. Whilst every effort has been made to 'front load' these allocations in terms of supporting evidence, the fact is that with a relatively high number of Strategic sites there will inevitably be slippage and a small 10% flexibility allowance will not suffice.

Furthermore, BCBC have put forward a relatively ambitious growth strategy in terms of economy and job creation. It also seeks to ensure that residents have access to services and facilities. Much of this is reliant on appropriate and sufficient housing being in place to accommodate the increasing population and to achieve the economic prosperity proposed in the Plan. Employers and service providers need critical mass to be in place to allow significant investment decisions to be made. Unless a certain area is high on their priority list, retailers and employers in particular will not invest in locations until the necessary mass or permissions are in place. Similarly bus companies require a similar level of population mass to ensure that their services are viable.

As we have highlighted in previous submissions, Coity is identified within the highest level within the settlement hierarchy (part of Bridgend Town), however it is excluded from SP1 Sustainable Growth strategy area. We do not wish to add further comment on this point, other than to reiterate that it should be included and that Llanmoor's candidate site is considered for allocation as a larger windfall sites. Alternatively, the settlement boundary could be extended to include the site within the settlement and any proposal would then be determined under the relevant RLDP policies.

3. CONCLUSION

BCBC's RLDP originally proposed a flexibility allowance of 20%. Following the removal of the proposed allocation at Parc Afon Ewenni, this figure was adjusted downwards to 13% and then to 10% - the bare minimum. The numbers lost in removing this allocation have not been replaced with other sites despite the housing requirement for Bridgend not having materially changed.

It is our view that the issues faced in the original LDP and which other Council's have experienced with similar strategies means that a greater level of flexibility is required if the Council is to meet the proposed annual housing delivery levels, particularly given that these annual figures far exceed those that have historically been delivered in the Borough.

Furthermore, such a flexibility allowance would allow for slippage resulting from delays in the planning determination phase – something which in Bridgend, like most Authorities, can be lengthy.

Given the above, a flexibility allowance nearer 20% made up of large windfall sites should be included to ensure that the Plan delivers its housing requirement and achieves key LDP objectives for sustainable growth.