

BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)

MATTER 2: ACTIVE, HEALTHY, COHESIVE, INCLUSIVE AND SOCIAL COMMUNITIES – HOUSING AND GREENSPACE

Prepared on behalf of Llanmoor Development Co. Limited

Rep ID: 223

1. Boyer is instructed by our client, Llanmoor Development Co. Limited ('Llanmoor'), to submit a Matter Statement in respect of Matter 2: Active, Healthy, Cohesive, Inclusive and Social Communities – Housing and Greenspace
2. This Matter Statement should be read in conjunction with previous responses prepared by Boyer:
 - Regulation 19 Submission (July 2021)

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?

Q2. 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?

3. The supply figure of 9,207 is derived from a 20% flexibility allowance with the inclusion of the proposed rollover Allocation COM1(1) Parc Afon Ewenni. However, the current submitted Plan (SD1) proposes the removal of Parc Afon Ewenni and makes provision for 8,335 new dwellings (incorporating a 760 dwelling over allocation / 10% flexibility allowance) to accommodate a housing requirement of 7,575 dwellings during the 15 year LDP period from 2018 to 2033.
4. Llanmoor are aware that during the Focussed Changes Stage, Strategic Planning Policy Officers previously confirmed the acceptability of a higher flexibility allowance, over the required 10% minimum, to allow certainty over the Plan period. Llanmoor would support an increase in the flexibility allowance.

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

5. Llanmoor do not consider that specifically Land West of Bridgend would result in an over reliance of the delivery of strategic development sites. As noted, Llanmoor control this strategic site which can provide certainty on the delivery.
6. Llanmoor do however recognise there needs to be a range and choice of dwellings provided by both strategic and immediate smaller allocated sites which are developer led. The smaller sites can provide certainty in delivery in the early stages of the housing trajectory, post Adoption.

7. In this regard, Llanmoor would therefore support an increase in the flexibility allowance to provide a greater range and choice of immediately deliverable and developer led sites.

f) How has the flexibility allowance of 20% been defined, And is it based on robust and credible evidence?

8. As noted in response to Question 2(a) Llanmoor are aware of the reduction to 10% flexibility allowance in the submitted Plan following the Focussed Changes July 2022 which removed the proposed rollover Allocation COM1(1) Parc Afon Ewenni.
9. Llanmoor note paragraph 5.59 of the Development Plan Manual (2020) in that *'The level of flexibility will be for each LPA to determine based on local issues; the starting point for such considerations could be 10% flexibility with any variation robustly evidenced'*.
10. In this case the flexibility allowance has been proven to be robustly evidenced at 20% and also as part of the Focused Changes at 13%.
11. Llanmoor would therefore support an increase in the flexibility allowance to provide a range and choice of immediately deliverable and developer led sites.

Q3. Is the rate of delivery contained in the housing trajectory realistic, and based on robust and credible evidence?

12. The level of deliverability in the housing trajectory relevant to Land West of Bridgend has been informed and agreed with Llanmoor.
13. Llanmoor have been in negotiations with the various landowners and their respective agents since October 2018 and can confirm that a Formal Joint - Landowner Agreement was legally exchanged and completed in October 2020. As such, Llanmoor has complete control over the whole of the land within the Allocation through individual landowner Option Agreements which allows the delivery of the whole site in a comprehensive manner.
14. Moreover, Llanmoor are a long-established and reputable regional housebuilder that has delivered a significant number of homes in South Wales. With this significant experience, combined with planning /technical information assessments (Supporting Evidence for Proposed Allocations SD134 – SD157) which confirm that there are no known constraints which cannot be mitigated.
15. This provides complete certainty on the delivery within the housing trajectory for this site.

Q4. Will the Plan deliver the housing requirement?

b) Should committed sites be allocated? If not, what will happen to such sites if planning permissions lapse?

16. Llanmoor consider that Committed sites should not be allocated, rather there should be an increase in the flexibility allowance to address such circumstances.

c) Is the Plan's housing strategy sufficiently flexible to respond to changing circumstances?

17. Llanmoor control the strategic site (Land west of Bridgend PLA3) which they consider has been thoroughly assessed as part of the Plan process and provides a very high degree of confidence that the site will realistically be deliverable in accordance with the housing trajectory.

18. However, Llanmoor recognise there needs to be a range and choice of dwellings provided by immediate smaller allocated sites which are developer led to cover any other change in circumstances for other strategic sites. These smaller sites can provide certainty in delivery in the early stages of the housing trajectory, post Adoption.
19. Llanmoor would therefore support an increase in the flexibility allowance to provide a greater range and choice of immediately deliverable and developer led sites.