

## BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)

### MATTER 1: PLAN PREPARATION AND LDP STRATEGIC FRAMEWORK

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 1: Plan Preparation and LDP Strategic Framework.
2. This Matter Statement should be read in conjunction with previous responses prepared by Boyer:
  - Regulation 19 Submission (July 2021)

***Issue – Is the LDP legally compliant, and is the Plan's Strategy justified and likely to be effective in ensuring that development needs of Bridgend can be met in a way that contributes to the achievement of sustainable development?***

**Q14. Is the approach to site selection sufficiently clear and transparent, and is it founded on a robust and credible evidence?**

**a) Are the allocated sites based on a robust site assessment methodology that takes into account all potential constraints?**

3. Bellway note that the allocated sites have undertaken a robust site assessment methodology, however, are aware that not all are developer led site allocations which can provide certainty on delivery. As a result, the ability to deliver the level of housing growth envisaged by the Plan through the non developer allocated sites is uncertain. This concern over delivery is addressed further in Matter 2 and responses to Question 2 and Question 3.
4. Bellway also highlight that at the Focussed Changes Stage, Strategic Planning Policy Officers presented a proposed new Allocation at Heol Fach, North Cornelly (the site promoted by Bellway – 222.C1) based on the site assessment methodology. This site was to be allocated in the Plan to address the proposed removal of the rollover Allocation COM1(1) Parc Afon Ewenni and to facilitate early development in the housing trajectory, post Adoption, as there are longer lead in times required for strategic sites to come forward. This developer led site, which is capable of being delivered by Bellway very early in the Plan period, was considered, by Officers, necessary for incorporation into the trajectory to provide a greater flexibility within the Plan.
5. The acceptability and suitability of the site, and the subsequent marginal increase in the flexibility allowance (from 10% to 13%) to provide for the Allocation of the site is outlined in the Candidate Site Assessment (SD64), *'The candidate site is located on the periphery on North Cornelly which is identified as a Sustainable Growth Area (as defined by SP1). The site is well serviced by the Active Travel network which will help foster and promote transit-oriented development. The site is considered to be free of any significant constraints. As such this site is allocated for residential development in the Replacement LDP'*.
6. Furthermore, Deposit Consultation Report – Summary Document (SD3) highlights at paragraph 2.11 that at the *'Post Deposit Stage, the Replacement LDP has been refined to incorporate a significant 13% flexibility allowance. This will ensure the Anticipated Annual Build Rate (AABR)*

*will remain deliverable throughout the plan period even if a significant unforeseen scenario, such as non-delivery of a strategic site, should occur. The Council considers that the total level of housing provision is set appropriately within the Replacement LDP.*

7. Given that the site at Heol Fach, North Cornelly was a proposed Allocation based on the same site assessment methodology and evidence base as those within the Plan (SD1), then if it was to be considered a credible evidence base then the site at Heol Fach, North Cornelly should be Allocated. The fact that Members unilaterally decided to remove the site prior to submission of the Plan undermines the assessment credibility and therefore Allocations cannot be based on robust evidence.

**Q15. Is it clear why the Strategic Development Sites were selected over other candidate sites? and is the Plan over reliant on the delivery of these sites?**

8. Bellway provided detailed objections raised in their Regulation 19 Submission (July 2021) relating to Strategic Allocation at Land East of Pyle (PLA5 AND SP2(5)) and is further addressed in Matter 12. Those points are not repeated here and please refer to Regulation 19 Submission.
9. Bellway are aware of only one developer led strategic site which can provide certainty in terms of delivery. However, Bellway raise concern regarding the drop in delivery within the Housing Trajectory between 2023/24 – 2025/26 post Adoption due to the longer lead in times required for strategic sites, the significant infrastructure required – in particular Land at East Pyle or those sites without a developer currently on board.
10. This, coupled with the annual shortfall in housing delivery against the Annual Average Requirement (AAR) method resulting -46% shortfall (346 actual dwelling completions compared to an AAR of 646 dwellings), as well as the -30% shortfall (2,920 dwelling shortfall) of actual cumulative completions across the first four years of the plan period clearly demonstrates the need for a greater flexibility allowance in the Plan to limit the over reliance on delivery from strategic sites.
11. In response, the Allocation of the developer led Heol Fach, North Cornelly (Bellway – 222.C1), along with an increase the flexibility allowance at 13% (both as previously confirmed acceptable by Officers) would assist in providing further certainty on delivery. This is especially relevant given paragraph 5.59 of the Development Plan Manual (2020) and the fact that currently only one Strategic Site is also developer led, *'It will be extremely rare that all sites identified in a plan with come forward in the timescale anticipated. Whilst there is a need to improve certainty through frontloading, as described earlier in the Manual, there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. A development plan will not be effective if it cannot accommodate changing circumstances'*.
12. To provide surety and accord with Test of Soundness 3 it is considered necessary to Allocate the developer-led residential site at Heol Fach, North Cornelly (Bellway – 222.C1) within Plan Policy COM1 (Housing Allocations), Policy SP6 (Sustainable Housing Strategy) and the associated Housing Trajectory 2018-2033 set out at Appendix 1.