

## **BRIDGEND LOCAL DEVELOPMENT PLAN EXAMINATION**

### **HEARING SESSION 1: STRATEGY**

#### **Prepared by Boyer Planning**

#### **In respect of Policy SP1 – Regeneration led development**

#### **Background to submitted Representations**

1. In response to the Deposit LDP, representations were submitted concerning the appropriateness of Policy SP1 regarding regeneration led growth. In particular we object to the lack of flexibility to allow growth within the Primary Key Settlement of Bridgend and outside of the Strategic Regeneration Growth Areas results in the Deposit LDP being unsound in terms of the following tests of soundness:

- CE2 in that the over reliance on development within the Strategic Regeneration Growth Areas is not realistic or appropriate and is not founded on a robust and credible evidence base;
- CE4 in that restricting development does not provide a reasonable level of flexibility to allow the Plan to deal with higher population and household growth and to meet local needs.

2. In our original representations we are clear that we do not seek to argue that the regeneration objectives of Strategic Policy SP1 are in any way incorrect. However, the strategy set out in Policy SP1 places a unrealistic reliance on delivery of new housing within the valley communities.

3. This will not happen without sustained investment by public and private organisations. At the same time, the overarching housing requirement is based on economic growth forecasts which indicate fewer jobs in the Authority in 2021 than in 2006. The extent to which such a strategy can therefore be achieved is undermined by the approach to housing numbers (based on economic forecasts), and we believe that this has led to an overly restrictive approach to accommodating growth.

4. Furthermore, we object to the limitations placed on the settlement of Bridgend to accommodate further growth, particularly given the settlement status as a Primary Key Settlement both with the Deposit Plan and Wales Spatial Plan.

5. For example, we note that whilst the northern and eastern areas of Bridgend are identified as being within the Strategic Regeneration Growth Areas the remainder of Bridgend is located outside and has been restricted in terms of growth with development being constrained to within the settlement boundary only.

6. As a minimum the Plan should seek to be in accordance with the Wales Spatial Plan, indeed the WSP requires that Key Settlements such as Bridgend *“must be successful in their own right and, where appropriate, function as service and employment hubs for smaller settlements. The focus will be to create affordable and attractive places to work, live and visit. The success of the key settlements should improve life in smaller rural and valleys communities, with good access to services being a key determinant of quality of life.”*

7. We comment further on the questions raised in relation to our earlier representations.

**Qn2g. Housing need and supply will be considered at tomorrow's session. However if some representors are correct in saying that additional housing allocations should be made to bring the housing supply figure closer to the 11,000 figure in the Welsh Government Household Projections plus a margin for non-delivery, is there scope to maintain a similar proportion of housing supply within the SRGAs such that the spatial strategy would be maintained?**

8. At present there is a lack of growth outside the SRGAs and a lack of deliverable land identified within the SRGA's accordingly additional land will need to be identified in order to meet needs. The key consideration should not be whether land is either inside or outside the SRGA's rather whether it is deliverable. Accordingly the proportion would be dependent upon deliverability. Therefore it should not be the case that all of the new requirement should be provided on new sites within the SRGAs, rather that it is entirely appropriate for additional growth to be accommodated in addition, within and adjoining those settlements outside of the SRGAs which Policy PLA1 identifies.

**2.6 Several representors who are promoting alternative sites suggest that more greenfield land should be released for housing to provide 'flexibility' (753.1; 784.3; 787.4; 788.1; 788.10; 792.1; 1063.1; 1239.1; 1245.1; 1255.1; 1255.8; 1255.14; 1255.19). The Council considers this to be unnecessary and that it would undermine the Plan's strategy.**

**Qn2k. Why is more flexibility needed?**

9. We set out our response to this in more detail in our Statement in relation to Session 2 and the questions raised therein. However, in summary we have numerous concerns with the identified supply that we believe seriously undermines the ability of the plan to deliver its strategy. We list a number of sites that we do not believe will be brought forward during the Plan period, these include sites subject to market led and technical / physical constraints.

**Qn2l. Would greenfield sites be likely to be developed first because of their lower development costs and lower alternative use values?**

10. Greenfield sites must be viewed positively in the context of Bridgend and they must be viewed as a stimulus to further development. It is our view that it should not specifically be a preference for greenfield sites first, rather it should be those that are viable and deliverable and able to provide the right type of housing required to provide a range and choice.

**Qn2m. Would such development support the regeneration-led strategy or undermine it?**

11. In the first instance, it is important to recognise that irrespective of greenfield or brownfield development there is a clear need to provide more housing within the Borough. It would be inevitable that this will be divided between the SRGAs and those suitable locations outside the SRGAs on the basis of deliverability. It is our view that not providing sites that are deliverable within the plan period, or providing for needs would significantly undermine the strategy.

12. Thus a proportionate release of deliverable greenfield sites at suitable settlements would sit within the LDP strategy and would not undermine the regeneration approach.