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**Response to Hearing Session Questions
relating to Session 1 – Strategy**

Redrow Homes

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30300/02

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1.0 **Introduction**

1.1 This report provides a response to questions raised by the Inspector in the hearing session agenda for “Session 1: Strategy”. These representations should be read in conjunction with our previous submissions on behalf of Redrow Homes (Representor Number 851.1).

2.0

Strategy

Qn1a. Is it implicit that the Plan is to be read as a whole or should there be either a statement to that effect or further cross-referencing in the interests of coherence?

2.1

No comment.

Qn1b. Should the Plan be seeking at 1.1.2 to ‘build upon and add value’ to the national Wales Spatial Plan?

2.2

No comment.

Qn1c. Having regard to coherence, is it appropriate in LS1 to describe recognised international, national and regional environmental features as key local needs and issues?

2.3

No comment.

Qn1d. Should the Welsh Language be addressed directly in the Plan?

2.4

No comment.

Qn2a. As Objective 1 generally seeks to produce ‘high quality sustainable places’ is it necessary to also modify Objective 1c to repeat the word ‘sustainable’ specifically in relation to the regeneration of the Porthcawl Waterfront and having regard to its proximity to sites of conservation importance?

2.5

No comment.

Qn2b. Should paragraph 2.3.31 further define the status of protected sites near Porthcawl and their legal status or is that suitably addressed elsewhere in the Plan?

2.6 No comment.

Qn2c. Does Objective 2e also need to repeat national policy in Planning Policy Wales aimed at reducing energy demand and improving energy efficiency?

2.7 No comment.

Qn2d. In Objective 3f, what does 'realistic' mean when describing town and district centres and is use of the term coherent?

2.8 No comment.

Qn2e. Does the Sustainability Appraisal and other supporting information demonstrate that environmental considerations have suitably informed the regeneration strategy notwithstanding the omission of such a reference from the listed considerations at paragraph 2.3.11?

2.9 No comment.

Qn2f. In that context:

(i) Why do Policies REG1 and SP9 provide for as much as 153ha of employment land?

2.10 No comment.

(ii) How much of that supply represents new allocations that are not already the subject of extant planning permissions?

2.11 No comment.

(iii) Does that high level of employment provision have implications for the amount of housing provision given that the Cambridge Econometrics Report concluded that economic growth would be reduced and that fewer households would be created as a result?

- 2.12 NLP has raised concern within our previous representations that the job and housing requirements are not aligned. This is largely due to the fact that the CE report has failed to justify a deviation away from the WAG 2008-based household projections and has thus allocated insufficient housing land to meet future needs.
- 2.13 Whilst the population forecasts produced by CE are similar to those produced by Welsh Government it is important to note from table 6 of Background Paper 2 that the migration element is based on an economic forecast for the loss of 600 jobs in BCBC over the plan period. The Background Paper and LDP are silent on whether this assumption of job loss also informs the plan's economic and regeneration strategy, but given the scale of new employment allocations it is assumed that the LDP is seeking a more positive economic future than that assumed within the household projection.
- 2.14 Further, key National and Regional needs and issue **NR6** identified within the LDP states that *"Bridgend County Borough should support the less prosperous parts of South East Wales by maintaining a long term local supply of land for employment which is well located and accessible, realistic and deliverable and offers sufficient diversity of choice"*. This therefore indicates that the Council has recognised the importance of the county borough as a driver of employment for the wider region.
- 2.15 The LDP Vision seeks to transform Bridgend County Borough by 2021 with a catalyst for this transformation being 'a successful regional employment, commercial and service centre in Bridgend'. This vision does not seem to accord with a housing requirement figure that is based upon a forecast of economic decline. The housing requirement figure needs to reflect the planning led vision for regeneration and transformation of the County Borough. The LDP Vision is given greater clarity through the LDP Objectives in section 2.2 which again appear to focus on economic growth and regeneration rather than planning for economic decline and its associated impact on housing demand.
- 2.16 If CE were to re-run the projection based upon the positive economic policy led assumptions underpinning the LDP, NLP consider that the net in-migration rates would be significantly higher resulting in a higher total population.
- 2.17 NLP support the Council's aspirations to secure economic growth through the allocation of a wide range and choice of sites. At present there is a significant misalignment between an economic strategy planning for growth and a housing strategy planning for economic decline. The LDP should be based on the assumption that the Council is planning for its economic strategy to succeed and should therefore increase its housing requirement figure accordingly to be at least in line with the WG household projections.

2.18 This is particularly the case in Pencoed, where despite there being very limited development opportunities within the existing urban boundary, the Council has not sought to amend the existing UDP boundary to incorporate any additional sites. Consequently, land for just 70 residential units has been allocated within the limits of Pencoed.

2.19 This very low level of housing growth is completely at odds with Pencoed's position within the settlement hierarchy and the fact that significant job growth is being directed to the settlement given the allocation of Pencoed Technology Park as one of four 'Strategic Employment Sites' (allocated to provide an additional 5ha of high quality employment development) as well as the extant consent at Bocam Park for additional employment development and a hotel and the adjacent employment development in RCT.

2.20 It is therefore considered that additional dwellings should be directed towards Pencoed in order to better align housing and economic growth.

(iv) If employment land provision substantially exceeds likely demand, would that risk substantial non-delivery and uncertainty in relation to the allocated sites including delivery of the mixed use sites and the regeneration-led spatial strategy?

2.21 Whilst we have no objection to the level of employment land allocated, our representations raised concern relating to the deliverability of several of the allocated sites given that many are long-standing allocations which have been unable to come forward due to issues of viability. Coupled with this, we also raised concern that the location of some of the proposed sites will not be attractive to the market.

2.22 Delivering the level and type of growth that is being sought within Bridgend will depend upon attracting new investment into the County Borough. This will be reliant upon ensuring that Bridgend is capable of competing against other South Wales authorities. It must therefore offer a range and choice of sites that are easily deliverable, accessible and attractive to the market. Given the strength of the employment locations in the south eastern part of the County Borough, the most commercially appropriate solution would be to ensure the continued delivery of land in this area so that future users might take advantage of the locational and business agglomeration benefits that exist. Indeed, as the County Borough Council plans for growth in the post-recession period, it should place an even greater emphasis upon ensuring a strategy that is attractive to the market.

(v) Is the extent of provision 'realistic about resource availability' including for infrastructure and site restoration?

2.23 No comment.

(vi) Would the extent of supply discourage speculative development for employment purposes?

2.24 No comment.

(vii) Does providing land to meet 'as yet unidentified needs' justify the extent of proposed provision?

2.25 No comment.

(viii) Has any consideration been given to the cumulative employment land supply including adjoining authorities?

2.26 No comment.

(ix) Is it necessary to protect all the allocated sites from other forms of development

2.27 No comment.

(x) Some REG1 sites are proposed for B1 and B8 development. Why does REG2 protect 'industrial land and buildings' and not other forms of employment land?

2.28 No comment.

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?

2.29 As discussed within our previous representations, it is considered that the Council's aspirations to regenerate areas such as Maesteg and the valley communities are more likely to be delivered if the main centres such as Bridgend and Pencoed can act as economic drivers for the sub area. It is unrealistic to expect the more economically fragile areas to lead the recovery from recession. As a result the conditions (including allocations) must also be in place in those areas best placed to take advantage of economic recovery to respond to increased investment in employment and housing.

2.30 Thus, whilst we would be supportive of a proportion of any additional housing going towards the identified SRGA's, we strongly consider that additional housing development within the key economic drivers i.e. Bridgend and Pencoed is required in order to better align housing and economic growth.

Qn2h. In the LDP, what is the proportion of allocated housing land on greenfield sites as opposed to brownfield (previously developed) land?

2.31 Whilst it is in principle preferable to allocate brownfield sites ahead of greenfield land the scale of growth required makes greenfield allocations inevitable. It is also the case that the areas of highest demand i.e. Bridgend and Pencoed do not have the same level of brownfield land as the regeneration areas.

2.32 The strategy for allocation of housing land has to reflect drivers of demand and spatial alignment with the economic strategy rather than slavishly follow the distribution of brownfield land.

Qn2i. To increase the housing supply would it be preferable to:

- use previously-developed employment land;
- use greenfield land that has already been allocated for new employment on mixed use or standalone sites; or
- release additional greenfield sites on the edge of urban areas?

2.33 The starting point for considering how to distribute any additional housing allocations should be the drivers of demand for that housing and alignment with economic growth. It would be inappropriate to simply allocate surplus brownfield land for housing without any analysis of the demand or deliverability of housing in that location.

2.34 It is inevitable that additional greenfield housing allocations will be required on the urban fringe and consideration should be given first to the most sustainable settlements that will be drivers of economic growth i.e. Bridgend and Pencoed.

2.35 Neither should consideration of future allocations be simply tied to previous allocations particularly if they are in areas of poor market demand.

Qn2j. Will the Council's intended preparation of an online LDP site database as part of the Annual Monitoring Report suitably address the Welsh Government concerns about the lack of clarity of delivery of the Strategy and especially the linkages between Table 3.1, Policies COM1 and COM2, paragraph 6.1.5 and the PLA1 settlement hierarchy?

2.36 No comment.

Qn2k. Why is more flexibility needed?

2.37 As discussed within our previous representations, it is considered that in some instances (i.e. Pencoed) that the proposed settlement boundaries have been drawn too tightly in the context of minimising Greenfield release. However, this only seeks to undermine the spatial strategy, particularly in terms of the alignment of economic and housing growth.

2.38 It is considered that additional Greenfield sites need to be released in the south east of the county where the market is buoyant and can deliver growth.

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

2.39 Potentially yes, but the key issue is delivering economic and housing growth. More difficult brownfield sites are more likely to be delivered in future if there is economic growth and associated increases in land values. Like much of South Wales Bridgend is not generally a high value location and so the emphasis in the first instance needs to be on ensuring that there are a range and choice of sites that are attractive to the market and deliverable. This is going to be particularly important in the absence of housing grant to support affordable housing delivery and the WG proposals for changes to the Building Regulations that may significantly increase build costs.

2.40 As discussed, a number of the regeneration sites are located within the valley communities which have weaker markets, resulting in lower revenues and sales rates. This is more likely to be a barrier to delivery and ultimately the timing and phasing of development rather than the type of site.

2.41 In relation to the Porthcawl waterfront site, it must be noted that high levels of capital will be tied up in the development before revenue returns are generated, thereby making its delivery more difficult.

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

2.42 As discussed within our representations, we are significantly concerned that the Council's aspirations to regenerate areas such as Maesteg and the valley communities is more likely to be delivered on the back of strong economic growth. The drivers of such growth are more likely to be Bridgend and Pencoed in the first instance. These larger settlements are still not prosperous by national standards so to restrict growth on the basis that it might direct growth to more depressed areas would be counter-productive.

2.43 Further, the introduction of the Community Infrastructure Levy (CIL) and the receipts gained from developments in more prosperous areas may in turn help regeneration projects come forward elsewhere within the county borough i.e. in the valley communities.

Qn2n. Is that necessary or is it suitably addressed by reading the LDP as a whole to include policies SP2, PLA4, and ENV4-6?

2.44 No comment.

Qn2o. Is PLA1 directed at all forms of development or only at housing? If the latter, should that be made explicit in the interests of coherence?

2.45 No comment.

Qn2p. SP1 says that: 'In particular, development will be focused in the [SRGAs]. Paragraph 3.1.15 in support of PLA1 says that 'The identified settlements will continue to be the main focus of future planned development.' How are these statements to be reconciled when Pencoed and Pyle/Kenfig Hill/North Cornelly are listed as main settlements and have strategic employment allocations but are not included in the SRGAs?

2.46 The deposit LDP tightly restricts development outside of the SRGA's which we consider is at complete odds with the proposed settlement hierarchy as defined by PLA1.

2.47 Indeed, our client submitted a candidate site 'Land at Pencoed Farm and Broomfield Farm' (reference 851.B1) for mixed use development which was dismissed by the Council in the first stage of the sifting process on the basis

that “The LDP Strategy does not identify Pencoed as a location for strategic growth with development located within the existing settlement boundary”.

2.48 However, this reasoning itself appears to be a complete contradiction given the allocation of a Strategic Employment Site outside the settlement boundary in the form of Pencoed Technology Park. Consequently, the Council has not provided a justifiable reason for removing this site from the assessment process and therefore it should be reconsidered for allocation for mixed use development which is promoted by paragraph 7.2.6 of PPW.

2.49 Furthermore, a pre-requisite for development of these strategic employment sites is also to ensure access by means other than the private car (paragraph 2.3.83). As such, not only does this allocation contradict the ‘no strategic growth’ stance the Council state they are adopting for Pencoed but also, the allocation of employment with no residential growth further conflicts with the other aspirations of the plan e.g. sustainability and carbon reduction targets.

2.50 The Council’s ‘Settlement Role and Function Study’ (December 2009) undertaken by Baker Associates scored Pencoed on a par with Bridgend, Maesteg and Porthcawl in terms of employment function, retail and community role, self containment and sustainable travel options (Table 6.4) and included it within a list of settlements they considered should be “*the focus of future development in the County Borough*” (Para 6.23).

2.51 We therefore consider that:

1. Pencoed should be recognised alongside Bridgend, Porthcawl and Maesteg as a hub for services, employment, housing and retail developments;
2. Pencoed should be formally recognised as a settlement for growth throughout the Plan;
3. Any reference to “no strategic growth” in Pencoed should be deleted;
4. Additional Greenfield site releases should be made within Pencoed to better align housing and economic growth; and,
5. ‘Land at Pencoed Farm and Broomfield Farm’ should be reconsidered for mixed use development given the Council’s reasoning for dismissing the site was completely flawed.

Qn2q. As long as a proposed windfall development lies within a defined settlement boundary how will it be assessed whether its scale is ‘commensurate with the role and function of the settlement’?

2.52 No comment.

Qn2r. Would that be a fifth SRGA?

- 2.53 NLP consider that given the strategic importance of Pencoed adjacent to the M4 corridor, that the prospect of making it a Strategic Regeneration Growth Area is not unfounded.
- 2.54 NLP made detailed representations to the Pencoed Regeneration Action Plan on the basis that the study was too narrowly focussed and did not assist the Council in achieving its objectives for the settlement. In our most recent representations (September 2011), we maintained our objections to this document and its reference within the plan, as it is considered that only through major investment in employment and housing (which given the constrained nature of the settlement would need to include the release of Greenfield sites) will the social and economic issues facing Pencoed be addressed.
- 2.55 If it is decided not to make Pencoed a SRGA, then as a minimum it needs to be formally recognised as a settlement for growth and additional development sites identified to better serve the settlement and align housing and economic growth.

Qn2s. What effect would that have on the regeneration-led strategy?

- 2.56 Pencoed requires regeneration, as identified within the Pencoed Regeneration Action Plan.
- 2.57 Further, as identified within our response to Hearing Session 2, we consider that there is significant need to boost the proposed housing requirement for the county borough to at least the level prescribed by the WAG 2008-based household projections.
- 2.58 On this basis, it would not seem unreasonable to direct additional need for residential development, towards Pencoed where there is a clear need to better align economic growth and housing delivery and to take advantage of the settlements strategic location on the M4 corridor.
- 2.59 As such, we consider that directing additional growth to the buoyant market of Pencoed will only increase the chances of successfully delivering regeneration elsewhere within the county borough,

Qn2t. Would there be a conflict with the Wales Spatial Plan which does not recognise Pencoed as a key settlement?

- 2.60 As a starting point, given its proximity, we would question whether the settlement of Pencoed is simply absorbed within the primary key settlement of Bridgend, particularly given the identification of Bridgend as a 'hub' and a

'Knowledge Economy Centre', and in light of Pencoed's strategic role as an employment hub, particularly in the technology sector.

2.61 Regardless of the above, although Pencoed is not directly recognised as a key settlement within the Wales Spatial Plan, it is considered to be important strategically given its location on the M4 corridor.

2.62 Further, key objectives for the WSP 'Swansea Bay – Waterfront and Western Valleys' area, include improving accessibility, developing a cutting edge knowledge economy and reducing economic inactivity. Additional development in Pencoed would only seek to assist in achieving these aims.

2.63 We do not consider there to be a conflict with the WSP. Indeed, in the same way that the Wales Spatial Plan emphasises the importance of the interdependent relationships that exist between Cardiff and the wider Capital Region, we would argue that the LDP must also recognise the interdependent relationships that exist between the South East of the County Borough and the wider County Borough by encouraging rather than impeding appropriate levels of growth in this important area.

Qn2u. Does the strategic development permitted and planned nearby at Llanharan in Rhondda Cynon Taff have any bearing on this?

2.64 It is considered that the proposed development at the Former OCC Site in Llanharan only seeks to highlight the strategic importance of Pencoed and again strengthens the need to focus additional development within this area, which will then establish spin-off benefits for the wider area, and particularly the identified SRGAs.

Qn2v. What is the reason for now excluding South Cornelly from being part of that main settlement and why was it previously included?

2.65 No comment.

Qn2w. Is it these environmental constraints that the Council considers make the settlement unsuitable for inclusion in the SRGA rather than a risk of undermining the regeneration strategy, as the Council suggested in its response to Representation 850.5?

2.66 No comment.

Qn2x. Could all development in the Plan be accommodated at Bridgend as one Representor suggests and, if so, would that accord with national policy, and what would be the implications for the rest of the authority's area? (1212.5)

2.67 Whilst we consider that additional development should be directed towards Bridgend, it is considered that this should be proportionate to the additional need for development identified (i.e. to increase housing delivery to reflect the WAG 2008-based household projections). In particular, as demonstrated within our previous submissions, we consider that our client's site, 'land at Llangewydd Road, Cefn Glas' (candidate site reference 796.B1) should be allocated for residential development.

2.68 However, we would oppose all development being directed to the town and would consider this an unrealistic and unsustainable approach.

Qn2z. As written the Policy would preclude not only unacceptable impacts but also any acceptable detrimental impact as well. Should it read 'Development likely to have an unacceptably detrimental impact etc.'?

2.69 No comment.

Qn2aa. As greenfield development of unallocated land outside settlements would contravene Policy ENV1, is Policy PLA2 necessary?

2.70 No comment.

Qn2bb. What examples of other forms of development might be controlled by the policy?

2.71 No comment.

Qn2cc. As it reflects national policy at Section 4.8 of Planning Policy Wales, would a different approach risk making the plan unsound?

2.72 No comment.