

BRIDGEND LOCAL DEVELOPMENT PLAN EXAMINATION

HEARING SESSION 15th MAY

Prepared by Boyer Planning

Response to Inspectors Questions

1.0 Qn4f On what does Boyer Planning base the estimate of delivery at 40 dwellings per annum?

- 1.1 We generally expect 30 to 40 dwellings per annum per outlet. This is reflected in projections for a number of other sites within the most recent JHLAS for Bridgend. We note that the JHLAS indicates 50 dwellings per annum in relation to this site, if this level were achieved then there would still remain a shortfall (c.300) by the end of the plan period.
- 1.2 I also note that the Council's expectation that the site would accommodate 350 dwellings. However, the Development Brief indicates a range from 250 to 350 dwellings as the capacity. The level of new development is significantly above this range.
- 1.3 Absent any detailed proposals or indications of funding for remediation then we believe that 40 per annum from 2016 as set out in our letter of 9th April is highly optimistic.

2.0 Qn5a Having regard to the Delivery Strategy and other information for the site included within the draft Masterplan Framework (SD54) does Boyer Planning have any evidence to support their assertion that the development of this site will be constrained to the extent that they claim?

- 2.1 All information in relation to site constraints has been taken from the LDP evidence base. In particular, the Development Framework "Delivery Strategy" (pages 45 to 49) that was prepared for the site on behalf of the Council. This sets out a number of constraints that must be resolved, these include:
1. Funding – a number of means of funding are considered but no firm proposals given in terms of gap funding. Until exact costs are established there can be no guarantee of funding;
 2. Costs – a key action is to establish abnormal costs in relation to remediation;
 3. Remediation – it is noted that there have been limited studies undertaken to investigate the exact extent of remediation required;
 4. Land ownership – it is noted that there are numerous owners including: the Local Authority; speculators holding land that are unlikely to develop themselves; owners and occupiers; and property investors holding land for income or for future development. Further it is noted that in order to bring the land forward the parties will need to agree land collaboration agreement with equalisation whereby, each landowner contributes to the costs of contamination, remediation and flood risk mitigation on a pro rata basis, based on the net developable area they contribute to the whole with allowances made to recognise the abnormal

costs attribute to each parcel. In the context of points 1 to 3 there is seems to be considerable work in order to achieve this;

5. Comprehensive development – it is noted that a piecemeal approach to the site's development would be unacceptable to the local planning authority as it could result in an unsatisfactory form of development and the Council require it to be developed in a comprehensive fashion. In the context of points 1 to 4 further clarification should be sought on whether this is achievable within the plan period in light of the constraints noted in the document.
6. Further recommendations set out within the document include:
 - *“Engagement of Travis Perkins and John Raymond Transport in commercial negotiation;*
 - *Formal engagement in negotiations to agree a collaboration agreement and equalisation.”*

- 2.2 Accordingly, unless there is evidence of substantial progress on the constraints identified by the Council (i.e. land owners agreement, comprehensive strategy for dealing with flooding; contamination schedule and funding required etc..) then we see little prospect of the higher level of development being achieved.
- 2.3 In this regard we would draw attention to the present situation in Caerphilly County Borough Council. In that case the LDP was reliant upon a large number of regeneration sites. However, 2 years after the adoption of the Caerphilly LDP there exists a significant shortfall of housing land (3.5 years) which is primarily due to allocated sites being classified as 3(i) due to constraints.
- 2.4 In relation to the above, we would further draw attention to the Brecon Beacons National Park LDP Inspectors preliminary findings. In that case a number of sites were identified by the Inspector and recommended for inclusion, importantly these sites were considered to be deliverable and genuinely available. In light of the present economic circumstances we would emphasise the importance of such available sites both socially and economically to both the local and national economies.

Boyer Planning
May 2013