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Date / Dyddiad: 21st February 2018

Lesley Griffiths AM
Cabinet Secretary for Energy, Planning & Rural Affairs
Welsh Government
Cardiff Bay
Cardiff
CF99 1NA

Dear Cabinet Secretary

Invitation to prepare a Joint Local Development Plan South East Wales – West, and Invitation to Local Planning Authorities to prepare a Strategic Development Plan

I refer to your letter of 13th December 2017 regarding your invitation to prepare a Joint Local Development Plan (LDP) for South East Wales-West and to prepare a Strategic Development Plan (SDP) for the South-East region.

I write to confirm Bridgend Council's support for the joint response set out in the letter dated 6th February 2018, sent to you on behalf of the 10 Cardiff Capital Region Council Leaders. The letter confirms support for the principle of preparing an SDP for the South-East region. It also confirms that there is no agreement amongst the 10 Local Authorities in the Cardiff Capital Region to undertake joint LDPs on the footprints proposed.

I also fully agree with the concerns and consensus points reached as a result of discussions by Leaders at the WLGA Executive Board, as set out in the letter of the 6th February 2018.

It is the view of Bridgend Council that the most appropriate way to respond to local issues, maintain plan coverage and deliver the best planning outcomes, is to proceed immediately with a review and replacement of its existing LDP (whilst simultaneously working collaboratively with our neighbours and with the region on the SDP), wherever possible sharing a joint evidence base.

I am therefore requesting we are allowed to proceed with a replacement LDP. The matter has been considered in depth in a report endorsed by Council at its meeting on 28th February 2018. The Council report is attached as substantive evidence in support of the Council's position and request.

It is noted that a number of the points raised in your letter relate to the success of the planning system and the lack of necessary capacity to progress LDPs on an individual basis. These require specific responses from the perspective of this Council.

In response to the issue you identify of *mixed success of Plans adopted between 2010-2015*, you should be aware that Bridgend's LDP Annual Monitoring Report shows that the LDP has been

successful in terms of the implementation of the plan's regeneration-led spatial strategy and bringing forward and delivering development sites and opportunities, especially for housing. We also expect to achieve our target for delivery of affordable housing, by the end of the plan period. The housing land supply has only recently fallen below the TAN1 5 year requirement and the current 4 year supply, set against the fact that there are less than 4 years remaining in the plan period, is a reasonable position that only emphasises the need to replace the LDP as expediently as possible. It should also be noted that Bridgend has always had up-to-date development plan coverage and until 2017, has always had more than 5 years housing land supply.

Your letter refers to the *unacceptable length of time* it has taken on average in Wales to prepare LDPs. From Bridgend's perspective, when the LDP system was enacted in Wales, we had a very recently adopted UDP (2005) and as such, there was no immediate imperative to prepare another development plan so soon after UDP adoption.

In terms of the issues you raise in connection with *capacity, capability and resilience*, the cost of an individual LDP Review is anticipated to be lower than for the original plan. We believe our policies to be quite robust and the main requirement is to 'refresh' the original evidence base. Last summer we presented your officials with our collaboration proposals to produce a joint evidence base, in the interests of both efficiency and alignment. Since the adoption of the plan, Bridgend has been 'planning financially' for the costs of a LDP Review by setting aside any unspent funding from the LDP budget into an earmarked reserve for future spend.

Furthermore, Bridgend has a track record of plan delivery and extensive in-house experience at managerial level of delivering development plans and the ability to drive a replacement LDP forward. In terms of timescales with respect to a replacement LDP we are confident that if undertaken on an individual basis this will be completed in 3½ years, before the critical 2021 end-date of the current plan.

The absence of an early LDP Review will result in a policy vacuum in Bridgend. The majority of LDP housing allocations have been delivered and we have a pressing requirement to identify new sites. Without an approved development plan, there will be significant pressure to release greenfield sites in unsustainable locations and the potential situation of 'Planning by Appeal'. Such a position will result in highly negative planning outcomes, which will needlessly divert valuable staff resources and potentially undermine a future core strategy associated with the SDP.

It is vital that Bridgend maintains up to date plan coverage and it is my view that this will be most effectively maintained by undertaking an individual LDP Review, with close collaboration within the region on an SDP.

Yours sincerely



Councillor Huw David
Leader of Council

Rydym yn croesawu gohebiaeth yn y Gymraeg. Rhowch wybod i ni os yw eich dewis iaith yw'r Gymraeg. We welcome correspondence in Welsh. Please let us know if your language choice is Welsh.