

**STATEMENT IN RESPECT OF SESSION 14 -ALTERNATIVE SITES – RHAYADER CS NO. 916
Bryngwy Fields, South Street, Rhayader**

1. Which particular part of the Plan is unsound?

POLICIES H1 Housing Provision and H2 Housing Delivery, specifically Housing Allocations for Rhayader @ 17.86 of the plan. In light of the PPW requirement that “The strategy, policies and allocations of a LDP should be realistic and appropriate having considered relevant alternatives and are founded on a robust evidence base”.

2. Which soundness test(s), set out in paragraph 2.5.11 of PPW, does it fail?

The Plan fails test two of the soundness tests set out in PPW - i.e. the Plan is not appropriate for the area in the light of evidence.

3. Why does it fail?

The Plan's allocation of housing land in Rhayader is inadequate in terms of its proportion of delivery of housing for the settlement, in that 100% of the allocated housing is over-dependent on two sites creating a linear urban extension on "greenfield" land with poor connectivity to the town centre. The Housing Allocation has led to and unnecessary extension of the UDP's permitted development zone, whilst more a central site with far better connectivity (with current UDP Housing Allocation status) has been rejected. The plan is therefore not realistic and appropriate, having failed to consider relevant alternatives and failing to carry out appropriate consultations in order to produce a robust evidence base.

4. How can the Plan be made sound?

The Plan (regarding Housing Allocation in Rhayader) does not take enough account of social considerations, particularly the need for elderly and special needs housing in an accessible location within the settlement. The allocation of additional / alternative land for housing adjacent to the town centre would help deliver the Plan's sustainability and social inclusion objectives and therefore, its overall soundness. Out of all the options for residential development in Rhayader, CS 916 offers the most sustainable (and sound) location. Not least, it provides the best opportunity to reduce travel as it is within easy walking distance to public transport and all of the town's services / facilities, particularly for the elderly and those without their own transport. It is a logical extension to the existing Bryngwy Fields Development and would therefore integrate exceedingly well with the existing settlement form. Moreover, it is within the existing Permitted Development Zone, rather than the allocation of site P52 HA2 on the far edge of the town which constitutes encroachment into open countryside. Additionally, it would be a far more appropriate use of existing infrastructure, as CS 916 already has in excess of £72,000 worth of estate road and services, in situ, specifically designed to enable the extension of the Bryngwy Fields Development.

5. What is the precise change/wording that is being sought?

That a reappraisal of the housing allocations in Rhayader be undertaken with a view to a more sustainable outcome in line with the aims and objectives of the LDP.

6. Matters to be addressed for each site where appropriate:

a) What is the current status of the site:

- i) Housing Allocation under the Powys UDP – R85 HA3
- ii) Phase 4 of a 4 part development at Bryngwy Fields, Rhayader

b) What is the size of the site and how many units will be delivered on site?

- i) 1.24 hectares
- ii) circa 30 units

c) Would the site contribute to the aims and objectives of the plan?

The alternative site would contribute positively to the over-arching Spatial Strategy of the plan and more specifically to Policies H1 – Housing Provision and H2 - Housing Delivery, by ensuring that a sufficient and appropriate range of housing sites are available in sustainable locations in accordance with the settlement hierarchy. Furthermore, the site is included in the updated JHLAS within the targets for Housing Delivery within the settlement of Rhayader. The alternative site does not conflict with any of the plans aims and objectives.

d) Is the allocation of the site consistent with the Plan's Spatial Strategy?

Yes - the site is within the Development Boundary of the settlement, with current UDP Housing allocation status and is a logical extension of a very popular, existing open market housing development.

e) Are there any significant restraints or barriers to the development of the site?

i) No - The site scored an equal rating on assessment to those that were eventually awarded Housing Allocation status within the settlement. Furthermore, the Representor contends that CS 616 would have been given an even more favourable score, had the Council fulfilled their obligation to engage in proper consultation with the landowners regarding the previous development and extent of existing infrastructure at the site. This would have better informed them of the Viability and Deliverability of the site.

ii) The main constraint to development would be the lack of Housing Allocation under the LDP proposals. The landowners (due to their advancing years) will not be developing the site themselves and it is currently for sale. The site is subject to a Court Sanctioned Tomlin Order which imposes the obligation that the site must be sold (following the dissolution of a family partnership) and Housing Allocation status would mean that the site has a more marketable appeal to other developers.

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f) Are there any infrastructure requirements for this site and how and when will they be delivered?

i) The Representor has already commented within his original representation regarding the existing infrastructure in situ and maintains that CS 916 is a far more suitable site than the Allocated sites in this respect.

ii) The site has the benefit of already being set up to extend all infrastructure and services from the previous phases of the Bryngwy Fields Development and as such there can be a seamless extension to CS 916 in this respect, as and when planning obligations and reserved matters are agreed regarding the further development of the site.

g) What are the proposed timescales for the delivery of this site?

Within 5 to 10 years and within the lifetime of the LDP.

h) Has a Development Viability Assessment been carried out? If so, what are its conclusions?

No - Not to the knowledge of the Representor.

i) What would be the implications of the site and/or supporting infrastructure not coming forward within the anticipated timescales for delivery of the Plan's housing and development strategy?

The site has been included within the JLHAS (as updated) and therefore should development *not* take place on this site, then the Council will have failed to meet the required Housing Delivery targets for the settlement, as informed by the said JLHAS.

The Representor wishes to reiterate that the marketability of this site (and therefore its potential for development) will be greatly enhanced by Housing Allocation status within the LDP.

The Representor looks forward to the Council's response to this written statement, setting out why it considers the Plan to be sound and in particular why the changes sought by the Representor would make it unsound.