

# 4. Housing Land Requirement

## PART 1 – POLICY 4

### Housing

#### Objections

DO/51225/1751	Mr P Allport
DO/51212/1717	Mr & Mrs Battrick
DO/51201/1524	Bellway Homes (Estates) Ltd
DO/51214/1722	Davies Bros (Waste) Ltd
DO/51203/1534	House Builders Federation
DO/51210/1680	Mr L Joseph
DO/51210/1883	Mr L Joseph
DO/51216/1729	Mr J Joseph & Mr J J Williams
DO/51213/1719	Mr R H Knight
DO/51215/1725	Mr R P Lewis
DO/51224/1746	Manning Construction & William Bros
DO/51174/1386	Pencoed College
DO/51226/1756	Mr M Phipps
DO/51220/1734	Mr M A Richards
DO/51228/1816	Mrs C M Roberts
DO/51207/1580	Messrs M J & E D Thomas & Other Land Owners
DO/51186/1421	Vale of Glamorgan Council
DO/51222/1740	Westbury Homes (Holdings) Ltd
DO/51157/1354	Wilcon Homes Limited

## PARAGRAPHS 2.3.1 – 2.3.12

### Land Use Strategy

#### Objections

DO/51203/1536	House Builders Federation
DO/51203/1537	House Builders Federation
DO/51203/1538	House Builders Federation
DO/51203/1539	House Builders Federation
DO/51203/1540	House Builders Federation
DO/51203/1541	House Builders Federation
DO/50017/6	Rhys-Davies Services Ltd
DO/51006/1109	C H Knight & Partners
DO/50017/5	Rhys-Davies Services Ltd

## PARAGRAPHS 4.3.1-7

### Housing Needs

#### Objection

DO/51203/1552	House Builders Federation
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## POLICY H1

### Location of Housing Development

#### Objections

DO/51203/1553	House Builders Federation
DO/51192/1450	Llynfi Valley Forum
DO/50017/10	Rhys-Davies Services Ltd
DO/50017/11	Rhys-Davies Services Ltd
DO/51051/1173	Ms S Rowe
DO/51186/1422	Vale of Glamorgan Council
DO/51194/1470	Welsh Development Agency
DO/51157/1355	Wilcon Homes Limited
DO/51204/1561	Mr & Mrs James
DO/51209/1654	Countryside Council for Wales

#### Issues

4.1.1 These are whether or not the UDP adequately assesses the requirement for additional housing over the Plan period, and whether or not its strategy for the provision of new housing is likely to meet that requirement.

#### Introduction

4.1.2 The objections made to housing policy are covered in three chapters in this report. This chapter deals with objections to the Plan's strategic housing policy (Part 1 Policy 4), justification for the housing 'numbers' and aspects of the land use strategy in Chapter 2, and general, non-site specific objections to Policy H1 which lists housing commitments and allocations. My conclusions take full account of the discussions at the Housing Round Table (RTS) session which was attended by the Council and many of those who had made strategic objections to the housing policy. I have also had regard to PPWales, which was published in March 2002 just before the opening of the UDP Inquiry, and which sets out the land use planning policies of the Welsh Assembly Government. In particular, Chapter 9 of PPWales, Housing, is relevant to this section.

#### Calculating the housing requirement 1996-2016

4.1.3 The Council projected the future overall housing requirement for the County Borough for the Plan period using known and anticipated house completion rates. As explained in the Introduction to Part 2 of the UDP, the estimated future house building rates provided inputs to the Chelmer Population and Housing model. This 'dwelling led' approach to projecting housing requirement, households and population has been accepted by objectors to the UDP as sensible and robust. Section 9.2 of PPWales provides guidelines for LPAs who are planning the provision of new housing, and indicates that the latest Assembly Government household projections should form the starting-point. Where LPAs deviate from these projections, they must justify the reasons for doing so. The Council has explained its preferred approach to projecting households and population in a number of documents, notably its Population and Dwelling Requirement Issues Paper (CD80). I agree with the suitability of the approach which the LPA has adopted and am aware that this followed detailed examination of both 'migration controlled' and 'dwelling led' methodologies.

4.1.4 However, I consider that paragraphs 2.3.1 and 4.3.5 to 4.3.7 of the UDP could usefully be re-written to clarify that the method of projection was 'dwelling led' rather than 'demographically derived'. Also, para 4.3.4 of the UDP indicates that in-migration is an input rather than an output to the projection model. The text could usefully be changed to correct this misconception.

4.1.5 Objectors refer to the fact that the draft deposit UDP indicated a different house building programme from that shown in the deposit Plan. The earlier version of the Plan adopted the Plan period 1996 to 2011, whereas the deposit UDP covers the period to 2016. Objectors observe that the deposit UDP relates to a period that was 33% longer than the earlier version but indicates only a 13% increase in the number of new dwellings. I understand that the figures in the draft deposit version were based on an assumption that sites allocated in the previous development plan would be built out by 2006. There is no substantial basis for this, and I consider that the Council was right to change this approach when it published the deposit UDP. I see no need to look further at the figures in the draft deposit Plan.

4.1.6 There is disagreement between the objectors and the Council as to which of two sources for past build rates should be used as a basis for projection. Figures available from the Welsh Office/National Assembly for Wales (NAW) were used by the Council in preparing the UDP, but objectors advance arguments in favour of figures assembled by the Joint Housing Land Availability Studies group (JHLAS). The second set gives higher figures for house completions in most years throughout the 1980s and 1990s, and objectors argue that use of the first series results in an under-estimate of future housing requirements. I am clear that both series have their advantages and disadvantages when used in the context of forecasting housing requirements.

4.1.7 However, studies by the Welsh Office and DETR in England have reported undercounting in the NAW and similar English series. The evidence is that Building Control Divisions have not attached a high priority to serving completion certificates and this has resulted in some omissions from the data. Though the JHLAS are concerned primarily with the assessment of housing land availability over the next 5 years, and less so with completions, there is limited evidence that the assessment procedures give rise to routine over-counting or double counting. On balance, I consider it likely that the JHLAS figures provide a more accurate record of past build rates. I am advised that neighbouring authorities including Cardiff use the JHLAS figures for UDP planning purposes. I am mindful that, for compilation of the JHLAS figures, the County Borough's own officers record planning permissions and pay visits to monitor progress on sites. It would make sense in my opinion for the LPA to use its own house completion figures more widely in the planning process.

4.1.8 There is also a difference of opinion between objectors and the Council as to whether the annual build rates over the previous 20 years or 10 years should be used as a basis for projection. Again, there are sound reasons for choosing a shorter or longer time horizon. A longer period would lessen the effect of abnormal peaks and troughs, but clearly some of the economic and social factors affecting rates in the earlier years may not be relevant in the future. I have given some weight to the Council's contention that some instability in the annual completion figures in the 1990s was due to the development of large housing sites, notably the site at Broadlands. The UDP land use strategy favours the development of fewer very large sites, and I accept that a smoother pattern of completions may be anticipated in future. On balance, I see no overwhelming reason to depart from the Council's approach of looking back to build rates from 1981.

4.1.9 Table INT1 in the Introduction to the UDP shows the building programme in 5 year tranches. The figure for the first tranche, 1996 to 2001 (1965 units), is derived from the completions recorded in the NAW figures for 1996 to 2000 plus an allowance for 2001 based on the average for the preceding 19 years (454 dwellings). Objectors argue that the figure of 1965 is too low for the period, as the JHLAS figures indicate that some 1993 dwellings were built between 1996 and 2000. They further contend, from provisional figures, that between 600 and 900 dwellings may have been built in 2001. I accept that the UDP figure may be too low for this initial period, and consider that the HBF's estimate of 2,600 for 1996-2001, based on JHLAS statistics and the provisional figure for completions in 2001, is more realistic.

4.1.10 Based on the above assessment, I conclude that the top line in Table INT1 should be changed. The projected building programme post 2001 should be increased to reflect the annual average completion rate from the JHLAS source of 490 dwellings for the period 1981-2000. The effect of the changes to the figures is to increase the building programme for 1996-2016 from 8775 to 9950 dwellings.

EVENT	1996	2001	2006	2011	2016
Bldg Prog		2600	2450	2450	2450

The PIMS shows a change to INT1 to correct a typing error in the second line, but I consider that the table should be changed to reflect the higher build rate. Amendments to figures in the explanatory text of paras 2.3.4 to 2.3.7 and in Figs INT 1 & 2, and in paras 4.3.5 and 4.3.6, would also be required for the sake of consistency.

## Housing Supply

4.1.11 The UDP explains that new housing is likely to be provided on (a) sites allocated in the Plan under Policy H1, (b) housing on small sites and conversions and (c) windfall sites.

4.1.12 On (a), the deposit Plan made overall provision in Policy H1 for 8,102 dwellings and the PIMS recommends that this be revised upwards to 8,195 on the basis of new planning permissions. However, the most recent and agreed figures from the JHLAS for 2000, published in December 2001, revise the figure downward to 6,856 dwellings. These revised figures were published in Appendix 6 of the Council's General Proof 2 (CD148).

4.1.13 C H Knight & Partners query whether the land use strategy, as described in paras 2.3.8 and 2.3.9 of the Plan can fairly be described as one of limited dispersal of growth, when a high proportion of the housing allocations are concentrated on a small number of sites. The housing allocations shown in Policy H1 show the dominating influence of sites at Broadlands (H1(24)) and Parc Derwen (H1(25)). Both sites were allocated under Policy H4 of the Ogwr Borough Local Plan to help meet the identified need for new residential development in the period 1991-2006 and beyond. Chapter 4 of the UDP explains that all former Local Plan housing sites have been monitored and re-assessed, and some have been excluded from the Plan because they have significant constraints. The monitoring and re-assessment exercise was described at the RTS and I am satisfied that this was a robust exercise. Broadlands and Parc Derwen do not fall into the category of sites with significant constraints, so that they might be expected to influence the pattern of development during the period of the UDP.

4.1.14 However, the UDP represents a departure from the approach of the Ogwr Borough Local Plan in that its major new housing allocations are much smaller in size than those contained in relevant policies of the Local Plan. The largest new allocations at Porthcawl (H1(58)), North Cornelly (H1(56)) and Maesteg (H1(61)) are estimated to have a capacity of 250-350 dwellings each. It may be towards the end of the Plan period before the changed approach favouring limited dispersal of growth manifests itself on the ground. However, I conclude that paras 2.3.8 and 2.3.9 of the UDP fairly describe such an approach to allocating new housing sites. Moreover, the list of Policy H1 sites in the UDP shows a reasonable geographical distribution throughout the County Borough with a choice of sites in different settlements. Porthcawl, Maesteg and North Cornelly with the most substantial new sites are among the County Borough's main settlements. I therefore consider the description of the strategy to be reasonable.

4.1.15 Policy H1 of the UDP indicates which sites are brownfield or substantially brownfield in character. Mr and Mrs James request a definition of brownfield sites which would include allotment gardens. PPWales Figure 2.1 includes a clear definition of previously developed land, and this excludes allotment gardens. I see no reason to depart from this definition in Bridgend County Borough. Rhys-Davies Services Ltd highlight the considerable amount of land for housing allocated on greenfield sites contrary, they say, to Government targets and the Council's own sustainable development objectives. They argue that the Council should seek to redress the balance by refusing to renew existing commitments and deleting housing allocations on greenfield sites.

4.1.16 PPWales outlines the approach to be taken to UDPs and new housing provision in section 9.2. This advocates the use of a search sequence for allocating sites in UDPs, beginning with the re-use of previously developed land within settlements, then settlement extensions and then new development around settlements with good public transport links. I consider that, in respect of the 'new housing allocations' as distinct from the 'remaining commitments 2000' in Policy H1, the Council has followed an appropriate site sequence. About half the new allocated sites are described as brownfield or substantially brownfield in character, and the other half are denoted as presently under-used sites within an urban area. Moreover, the overwhelming majority of new sites are located in or adjoining defined main settlements. The Council asserts that overall the proportion of allocated sites on brownfield or under-used land in urban areas will increase from 30% in the Local Plan to 40% in the UDP.

4.1.17 On the remaining commitments, and whether or not these should be deleted where they would result in the development of greenfield land, it is clear to me that the County Borough has an existing and future need for substantial new housebuilding. If the allocations on greenfield sites were deleted, I have insufficient evidence that enough, significantly better sites in terms of the site sequence, would become available in a reasonable time period to replace them. I conclude that the Plan makes provision for greater use of brownfield and under-used land for new housing development than in the past and is broadly in accordance with national policy.

4.1.18 C H Knight & Partners and the HBF refer to the last sentence in para 2.3.9 of the UDP. They question whether all allocations could be brownfield, and point out that national policy does not require it. I agree that the sentence is misleading, particularly in the use of the word 'should', and I shall recommend a change to it.

4.1.19 The Countryside Council for Wales argues that a policy is required giving criteria against which the amenity value of brownfield sites might be appraised. Para 4.2.4 of the UDP acknowledges that some sites may be of local importance to biodiversity.

However, I am satisfied that section 3.9 of the UDP, entitled Biodiversity and Nature Conservation, provides an appropriate policy background for assessing potential development sites, including brownfield ones, and any effects on biodiversity. I see no reason to duplicate the criteria in the housing chapter.

4.1.20 Regarding the number of dwellings which the allocated sites might be expected to yield, the Council assumes a density of 30 dwellings a hectare, unless an extant planning permission or site conditions suggest otherwise. Ms Rowe expresses an objection to high density living and the potential reduction in environmental quality. The costs of providing additional services and dealing with increased traffic congestion, she argues, could be overlooked. However, I consider that 30 dwellings a hectare on average is not unduly high and is widely used for planning purposes. Importantly, the Council's approach is compatible with making the best use of available land.

4.1.21 For (b), small sites and conversions, the UDP predicts that 50 dwellings per annum (800 for 2000-2016) are likely to be provided from small scale infilling, rounding off and the conversion of existing properties. The figures are based on monitoring small sites over the past 10 years. On (c), windfalls, the Plan makes no prediction of future numbers, though CD148 suggests, from experience 1995-2000, that an additional 20 dwellings a year could be completed on large windfall sites over the Plan period. This would give an additional 320 dwellings for the period 2000-2016.

4.1.22 Objectors argue that the supply of small and windfall sites would be likely to diminish in future, as settlement boundaries have been tightly drawn and available opportunities for infilling would be used up. However, as yet, the Council has not drawn boundaries around its main settlements, and envisages that there would be more flexibility for development within them. I accept that, because of their physical attributes, some built-up areas will be more likely to yield windfall/infill sites than others. However, economic and social factors also have a substantial influence on the way in which land and buildings are used. Industrial decline or a social preference for living close to city centres are examples of changes which have affected the pattern of windfall or infill development elsewhere. More significantly perhaps, Government policy favours the re-use of redundant land and buildings, encourages mixed use development and increased densities. In the circumstances, I see no reason to reduce the estimates for small sites or windfalls over time. I am satisfied that the forecasts for small sites and windfalls, being based on past experience, are appropriate.

4.1.23 Several housing sites allocated in the previous Ogwr Borough Local Plan were excluded from Policy H1 of the UDP following a re-assessment. The UDP makes plain that the excluded sites were subject to constraints ranging from ground instability and contamination to flood risk. I agree with objectors that it would be inappropriate to place any reliance on the future availability of sites which were previously allocated in the Local Plan, were not developed and subsequently assessed as seriously constrained.

4.1.24 Para 4.4.11 of the UDP and the footnote to Policy H1 indicates that the development of selected sites should be in accordance with development briefs and/or appropriate planning/highway agreements. Rhys-Davies Services Ltd argue that there is no general justification for the preparation of development briefs, with adequate measures in national and other development plan policies to ensure that sites are developed appropriately. In addition, planning or highway obligations must be fully justified for each application and follow the advice in Welsh Circular 13/97. Policy H1 identifies the largest housing sites and most of the new allocations as ones for which a development brief will be sought.

4.1.25 I consider that development briefs would be helpful to decide matters such as layout, phasing, or the timing of infrastructure development, and could be mutually beneficial to avoid abortive work by developers early on. However, it seems to me that alternative approaches to development briefs, such as pre-application discussions and detailed planning applications, could obviate the need for development briefs in some cases. For planning and highway obligations, it is essential that the advice in the Circular, reinforced in PPWales para 4.7.5, is followed. I consider that the wording in Policy H1 and the supporting text should be changed, to indicate that development briefs and/or planing and highway agreements *may be sought*.

4.1.26 The future supply of housing in the County Borough will also be influenced by the incidence of housing demolition. Figures for the late 1990s show that more than 200 units were demolished between 1996 and 1998, but only 1 demolished between 1998 and 2000. Programmes for the replacement of local authority housing have an influence on the demolition rate, which appears to have varied from year to year. Clearly, trends in demolitions need to be monitored and account taken of the condition and prospective useful life of older housing stock when preparing forecasts. Though the size of the future demolition programme will affect the net change to dwelling stock, it will not reduce the overall dwelling requirement. On the contrary, if the rate of demolition rises substantially, there will be a need to increase the rate of new house building to provide replacement dwellings for occupiers. I agree with the objectors that CD148 is not clear on this point. However, I accept the Council's estimate that some 346 dwellings are likely to be lost to demolition between 2000 and 2016.

4.1.27 In summary, I calculate that the future supply of new housing added between 2000 and 2016 is likely to be:

(a)	Policy H1 sites	6856
(b)	Small sites	800
(c)	Windfall sites	320
	Demolitions	-346
	<b>Total supply</b>	<b>7630</b>

4.1.28 The dwelling requirement for 1996-2016 was shown above as 9,950 for the period 1996-2016. Deducting the 1993 dwellings which were completed between 1996 and 2000, this gives a requirement of 7957 new dwellings for 2000-2016. The supply figures imply a small shortfall in dwellings by 2016, though it would be less than might be completed in one average year.

4.1.29 In Chapter 6, where I assess the 'omission' sites, which are put forward by objectors as potential housing sites for inclusion in Policy H1 of the UDP, I conclude that two sites should be made available for new housing development. These are at Ty Draw Farm, Pyle, and Wyndham Close, Bridgend. These sites could provide some 8.25has of land for new housing development. Planning permission has been granted since publication of the deposit UDP for some 96 new dwellings on land at The Triangle site, Pencoed. I recommend in Chapter 5 that land north of Lock's Lane, Porthcawl (H1(59)) would be capable of accommodating more than 12 new dwellings, as indicated in the UDP. If the capacity of these sites is added to the supply as calculated above, I conclude that there is a reasonable

balance between likely supply and requirements, and no need to search for additional housing land.

## A Flexibility Allowance

4.1.30 Objectors emphasise that the allocated sites must all be capable of development in terms of the numbers and densities proposed. Experience suggests that non-implementation of housing sites is commonplace. A number of objectors suggest that an allowance should be made in the allocations for sites which are identified but do not come forward for development within the period of the Plan. It was pointed out that some of the sites allocated in the Ogwr Borough Local Plan were later found to have constraints, and similar problems could be found with some of the UDP sites. It was also argued that it was common practice to make a 10% allowance in the interests of promoting flexibility and choice, notably since publication of a study by the Roger Tym Partnership for the DoE in the early 1990s. Reference was made to a more recent Civic Trust Study (1998) which found identified sites in a number of towns and cities in England and Wales undeveloped after 12 years. This second study focussed on brownfield sites, and I recognise that such sites are represented among the Policy H1 allocations in Bridgend. The Council's view is that the JHLAS provides an ongoing collaborative process of assessing housing sites, which should obviate the need for a flexibility allowance. I am mindful that this monitoring process has led to the removal of some sites and reduced expectations as to the numbers of houses which others listed in the deposit version of the UDP might deliver.

4.1.31 PPWales emphasises the importance of planning for sustainable development. At para 2.3.2, it indicates that planning policies and proposals should promote resource-efficient settlement patterns that minimise land take and urban sprawl, especially through preference for the re-use of suitable previously developed land and buildings, wherever possible avoiding development on greenfield sites. It seems to me that, if a 10% allowance is made for housing land which is not subsequently required because the JHLAS process is successfully weeding out the sites with constraints, the UDP will over-allocate housing land. In Bridgend CB, if additional allocations were now made, it was agreed at the RTS that they would in practice be on greenfield sites. If housing land were over-allocated, the greenfield sites would most likely be selected for development before the brownfield sites, and that would undermine the aim for more sustainable development.

4.1.32 PPWales requires LPAs to ensure that a 5 year supply of land is genuinely available or will become available. The JHLAS report for 2000 (CD79) gives the most recent calculation of the available land supply. This indicates that some 3327 dwellings could be provided within the next 5 years, indicating a supply of between 6.1 years and 8.9 years, depending upon the chosen methodology. These figures are now somewhat dated and TAN (Wales) 1 (CD71) advises that the housing land situation can change rapidly. Nevertheless, on the available evidence, I am satisfied that the LPA is providing sufficient, genuinely available land to provide a 5 year supply as required by Government policy, and will be monitoring that supply on a regular basis in future. If there is a need for additional housing land later in the Plan period, I consider that there will be sufficient time to identify suitable sites and to review the opportunities in respect of brownfield land. In my view, the provision of a 10% flexibility allowance in the UDP is unnecessary, and could be contrary to the promotion of sustainable development.

## Implications for Population and the Economy

4.1.33 Table INT1 in the UDP illustrates how the projected building programme is expected to affect the future number of households and population in the County Borough. Objectors argue that the average household size was probably lower at the start of the Plan period than 2.52 persons, as assumed by the LPA, and would fall below 2.3 persons in 2016, as shown in the UDP. The Council argues that it has used the most up to date information available for Bridgend CB when preparing the households and population forecasts, although the only household size figures available at District level and suitable for use in the projection model date back to 1992. Even if a relatively high average household size was assumed at the start of the projection period, the Council argues that its figures show a reduction in average household size over time similar to that projected using other datasets. Notwithstanding this fact, since the projections are 'dwelling led', I conclude that any error in the household formation data will not lead to a shortfall in housing supply. It will not increase development pressure in the neighbouring Vale of Glamorgan, as its Council asserts.

4.1.34 Objectors challenged the Council's argument that there has been net outward migration from Bridgend since 1995. However, the Registrar General's mid-year estimates indicate a small net loss for the late 1990s following a small net gain in the preceding 5 years. The future population will be slightly greater than is shown in Table INT1 in the UDP if higher build rates, as outlined above, are input to the population and household projection model, and other assumptions including those for vacancy rates, persons in institutions etc remain the same. If the building programme shown in the UDP would result in modest net inward migration annually to 2016, then the higher build rate should give marginally higher net inward migration over the period.

4.1.35 Objectors suggest that the aims and objectives in the UDP for employment growth require future house building rates at least equivalent to those achieved in the past. They contend that there should be a reasonable balance in the growth of homes and work opportunities, so that people taking up new jobs in the County Borough will have a sufficient range and choice of housing in close proximity to their workplace. This is consistent with PPWales, paragraph 2.5.3, which seeks a broad balance so as to minimise the need for long distance commuting. I appreciate that commuting patterns in and out of Bridgend are highly complex, as the County Borough is located between the two large centres of Swansea and Cardiff, and possesses good motorway access. There can be no guarantee that workers will necessarily choose to occupy jobs which are available closest to their homes.

4.1.36 The deposit UDP allocates some 370has of employment land, and para 5.1.5 of the UDP admits that there is a more than adequate supply to cater for expected future industrial and commercial requirements. In the PIMS, the Council proposes the deletion of a very substantial employment site at Wern Fawr, and I recommend, in Chapter 7, that the allocation at Sarn Park should be taken out of the Plan. Nevertheless, the objectors argue that, even with the provision of an additional 180has of employment land, there could be new job opportunities for an additional 9,000 workers, who will require local housing.

4.1.37 I accept the Council's argument that the allocation of employment land is different from the allocation of housing sites. Employment land is more differentiated, should offer a broader range of sites and may be developed over a longer time scale than most housing land. For these reasons, I would not expect an exact correlation between housing land and employment land and I consider that it would be desirable, in order to offer choice to potential investors, to have a sizeable employment landbank. The higher house building rate which I recommend would most likely result in a marginally higher resident,

economically active population and this would be beneficial for an expanding local economy. However, I also attach some weight to the Council's argument that an enhanced take up in employment land could enable a reduction in unemployment, a rise in the average age of retirement and a lessening of outward commuting. Although objection was made to the method of forecasting the economically active population, I am satisfied that the local activity rates used by the Council are appropriate.

4.1.38 Objectors draw attention to para 4.3.4 of the UDP, which refers to the possible impact on migration to Bridgend of changes in the region. A green belt around Cardiff and development at Cardiff Bay are mentioned. I consider that this paragraph should be re-written, as the Council's dwelling led approach to projections of households and population has not taken specific account of these features. However, the build rates which I propose would be consistent with a modest level of inward migration, and I see no reason to plan for overspill from the Cardiff area on a significant scale. I conclude that the figures for the housing requirement, with the upward revision which I shall recommend, will be broadly compatible with the economic policies in the UDP.

4.1.39 A minor point raised by the HBF is that employment land allocations, in excess of 300has, are greater than those made for housing in the Plan period. I consider that the second sentence in para 2.3.1 of the UDP should be altered to reflect this fact.

## Conclusions in Summary

4.1.40 I conclude that the future housing requirement should be calculated using the dwelling led approach, and the series of housing completions since 1981 assembled by the JHLAS. This gives an annual average completion rate of 490 dwellings. I consider that the best estimate for housing completions for the period 1996 to 2001 is 2600 units. This gives a housing requirement of 9,950 dwellings for the period 1996 to 2016, and 7,957 dwellings for the period 2000 to 2016. I consider that the best estimates for the future housing supply are for an increase in new dwellings from (a) housing allocations of 6,856 (b) small sites of 800, and (c) windfalls of 320 dwellings. When allowance is made for future demolitions of 346, this gives future new supply of 7,630 dwellings. These figures point to a small shortfall over the Plan period of 327 dwellings, or less than one year's provision. However, with two new potential housing sites which I identify in my Chapter 6, a recent planning permission at Pencoed and scope to provide additional housing at a site in Porthcawl, I conclude that there is a reasonable correlation between requirement and supply. On this basis, I shall not recommend that additional sites are identified in Policy H1. I do not favour making a flexibility allowance, in the interests of ensuring that brownfield sites are developed. I consider that the provision for new housing in the Plan is broadly in accordance with its economic policies for continuing growth and prosperity.

## Recommendation

4.1.41 I recommend that changes be made to the text of paras 2.3.1, 4.3.4 and 4.3.5 to 4.3.7 to make clear that a 'dwelling-led' approach to projecting households and population was taken.

4.1.42 I recommend that the penultimate sentence in para 2.3.1 should be amended to say that 'housing development is, and will continue to be, a principal consumer of land'.

4.1.43 I recommend that the figures for the building programme in Table INT1 be amended as I have shown in para 4.1.9 above. Then figures for the remainder of that table and in paras 2.3.4 to 2.3.7 and Figures INT1 & 2 of the UDP should also be modified.

4.1.44 The PIMS points out a typographical error in Table INT1, which is referred to in para 2.3.5. The figure for 'Total Dwellings for 2006' should be 57,479. However, I recommend that Table INT1 be totally revised using a different building programme, so that this revision need not be made.

4.1.45 I recommend that the figures in Part 1 Policy 4, and in paras 2.2.2 and 4.1.1, 4.3.7 and 4.4.2 should be modified to reflect a dwelling requirement of 9,950 dwellings for 1996-2016.

4.1.46 I recommend that figures for future population as shown in paras 4.3.5 and 4.3.6 of the UDP should be modified in line with the revised building programme.

4.1.47 I recommend that the last sentence of para 2.3.9 be modified on these lines:

'However, nearly all the new sites additional to those identified in the previous development plan are either brownfield, substantially brownfield or under-used urban sites within the main settlements, in accordance with the principles of sustainability.'

4.1.48 I recommend that Policy H1 should be updated in line with the PIMS, Appendix 6 of the Council's General Proof 2 (CD148) and comparable, more recent data. Figures in paras 4.4.8 and 4.4.9 of the reasoned justification should be modified accordingly.

4.1.49 I recommend that the footnote to Policy H1 and the supporting text in para 4.4.11 be modified to indicate that the development of specified sites should be subject to pre-application discussions with the County Borough Council. Development briefs and/or planning and highway obligations may be sought as appropriate.

