

BRIDGEND
REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Matter 3: Active, Healthy, Cohesive, Inclusive and Social Communities – Affordable Housing and Gypsy, Travellers, and Show People

Issue - Are the requirements for affordable housing and Gypsy and Travellers accommodation supported by robust and credible evidence and consistent with national policy? And will they be met during the Plan period?

Affordable Housing

1. Is the Local Housing Market Assessment (LHMA) based on robust and credible evidence? And are the findings sufficiently to inform the Plan's affordable housing strategy?

Yes, the LHMA was updated in 2021 and drew upon a range of socioeconomic, demographic and property market data in order to provide detailed insights into the mechanics of the local housing markets. The Assessment analysed the latest data from the housing register, homelessness presentations, trend based social lets, committed affordable housing supply, housing stock, house prices, private rents, household income and household projections. Welsh Government Guidance has been closely followed to identify the annual level of housing need across Bridgend County Borough in numeric and spatial terms. The type of need in different Housing Market Areas (e.g. tenure mix and house types) has also been calculated and extrapolated over the Replacement LDP period in accordance with Edition 3 of the Development Plans Manual. The LHMA forms a core piece of baseline evidence to support and has duly influenced the scale, type and location of growth within the Replacement LDP. Refer to Background Paper 2: Strategic Growth Options Background Paper 3: Spatial Strategy Options, respectively).

a) What scale of housing need has been identified in the LHMA?

The LHMA calculated a total need for 5,134 affordable housing units from 2018-2033. However, it is important to emphasise that this identified need should not be considered a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the scale of housing need within Bridgend County Borough, which the Council will seek to address through a range of market interventions as far as practically possible. The Replacement

LDP is one of several affordable housing delivery mechanisms and its contribution towards this total need has been informed by robust plan-wide and site-specific viability assessments.

b) What mix of tenure (e.g intermediate or social rented) and of type dwelling (bedroom size) are required?

The total need for 5,134 affordable homes, comprised 2,839 social rented dwellings and 2,295 intermediate dwellings (rounded) from 2018 to 2033. The majority of need is for sustainable smaller dwellings. Over the whole plan period, social rented need comprises 2,312 one bedroom social rented dwellings, 181 two bedroom social rented dwellings, 239 three bedroom social rented dwellings and 107 four bedroom social rented dwellings. Over the same period, intermediate need comprises 2,295 dwellings, split evenly between two and three bedroom dwellings. The full breakdown is provided in the LHMA within Tables 14a (for the first five-years of the LDP period) and Table 14b (for the remaining ten years of the LDP period). The geographical tenure mix data has been used to inform Replacement LDP development, including viability testing (plan-wide and site-specific), notional unit mixes and site capacity assessments.

c) Will the affordable housing target of 1,977 dwellings meet the local housing need, if not what other mechanisms are available?

Each component of affordable housing supply (that the Replacement LDP can realistically deliver) has been carefully considered in relation to development viability and the housing need identified in the LHMA. This was refreshed post Deposit Stage and the Replacement LDP is now expected to deliver a total of 1,595 affordable dwellings across the County Borough in order to contribute to the level of housing need identified by the LHMA. This represents the overall affordable housing target, comprised of the individual components of affordable housing supply that are expected to be funded and delivered through the planning system over the Replacement LDP period. This equates to 31% of the total need identified in the LHMA. The thresholds for and percentages of affordable housing provision have been set with regard to the housing need identified within the LHMA, the Plan-Wide Viability Assessment and site-specific viability testing.

While the Replacement LDP will therefore not meet the full extent of housing need identified in the LHMA, it is ultimately only one source of affordable housing supply and is not the only delivery mechanism. Both national guidance and the LHMA itself clarifies that this headline need figure should not directly translate into a delivery target for the LDP. Delivery of the remaining need for affordable housing (identified in the LHMA) will be enabled through a range of

other mechanisms, including: Social Housing Grant, alternative capital/revenue grant funded schemes, RSL self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector, RSL acquisitions, private equity investment, re-utilisation of empty properties and re-configuration of existing stock. These mechanisms are outside the scope of the Replacement LDP itself, especially considering that past availability of capital funding (notably Social Housing Grant) does not provide a robust indication of the future availability of funding over the plan period. On this basis, no further allowance has been made to factor in such alternative affordable housing delivery mechanisms at this stage of plan preparation.

Moreover, in practice, levels of housing need will never be reduced to zero as there will always be households falling into housing need and other households fulfilling their housing needs. These complex demographic relationships are a by-product of socio-economic and political influences that continually change and will be assessed as part of future LHMA updates throughout the LDP period, which will in turn inform evolving strategic housing priorities. Refer to Background Paper 5: Affordable Housing.

2. Is the Plan-wide Viability Assessment based on robust and credible evidence?

Yes, the Plan-Wide Viability Assessment is based on robust and credible evidence and was undertaken in accordance with the guidance detailed in the Development Plans Manual (Edition 3).

Before any viability appraisals were undertaken, a steering group was established to inform and help achieve broad consensus on the key viability inputs. Successive meetings enabled open discussion on the process, methodology and components necessary to underpin the appraisal. The diverse range of views and comments cited helped to build a better understanding of the costs and values of development across the County Borough, resulting in a Statement of Common Ground.

In April 2020, an agreement was reached to use the Burrows-Hutchinson Viability Model across the South East Wales Region. The steering group broadly supported use of the Burrows-Hutchinson High-Level Viability Model (HLVM) to undertake plan-wide viability testing for the Replacement LDP. Utilisation of a consistent model across the region was also specifically commended. Each viability component (derived from the Statement of Common Ground) was inputted into the HLVM to test broad development viability across the County Borough. This was undertaken prior to publication of the Deposit Plan to comply with the requirements set out in PPW and the refreshed guidance within the Welsh Government

Development Plans Manual (Edition 3, 2020). Refer to Plan-Wide Viability Assessment 2021 and Background Paper 5: Affordable Housing.

a) Does the study's methodology take account of variations in building costs, planning obligations, sustainable urban drainage systems, fire safety measures and other associated requirements?

Yes, the Assessment factored in appropriate values for buildings costs and planning obligations along with an uplift for the adoption of sustainable urban drainage systems, ULEV charging points, sprinklers and the introduction of Part L of the Building Regulations. The steering group discussed the need for the Assessment to make an allowance for these additional building costs on the basis that past build cost information does not include more recent, additional building regulation requirements. Appropriate additional allowances were therefore incorporated on this basis and informed by steering group discussions.

Additional sensitivity testing was also conducted based on changes in construction costs (housing and physical infrastructure), open market house prices and land prices (plus associated costs). The outcomes of these sensitivity tests are also summarised within the Assessment to illustrate how potential variations in certain components can impact upon the surplus or shortfall on target profit.

The Assessment also did not seek to test sites to the margin of viability and therefore allowed for a contingency of 5% on total construction costs in order for the Replacement LDP to be able to respond to changing markets and other variables. This was considered an acceptable level of contingency by the steering group in order to de-risk the plan and safeguard against the need for frequent updating in the event of a change in economic circumstances and/or site-specific issues.

3. How have the affordable housing targets and thresholds in Policy COM3 been defined?

The thresholds for and percentages of affordable housing provision have been set with regard to the housing need identified within the LHMA, the Plan-Wide Viability Assessment and site-specific viability testing.

The area wide targets within Policy COM3 were defined based on the findings of the Plan-Wide Viability Assessment and will ultimately be used to specify the affordable housing policy requirements for large windfall sites (10 units or more). However, site-specific testing for sites key to delivery of the Plan and smaller housing allocations provided more specific evidence to maximise policy gains.

Unlike the Plan-Wide Viability Assessment, therefore, these site-specific appraisals are more distinct in nature and considered more detailed contextual factors. This evidence indicated that higher levels of affordable housing could be supported on certain sites as detailed within Policy COM3.

This dual-faceted approach is considered paramount to ensure LPA’s aspirations for delivering high-quality new communities remain realistic and deliverable throughout the plan period. Edition 3 of the Development Plans Manual advocates this approach and recognises that “much more insight can be gained which can result in refined affordable housing targets, as opposed to the broader area identified in the high level appraisal. The two are not contradictory, rather the site specific being a refinement of the high level appraisal” (WG, 2020, para 5.89).

a) Is the affordable housing target of 1,977 dwellings realistic and based on robust evidence?

The level of affordable housing contributions that can be secured through the planning system was considered in terms of how viable it is for different areas and sites to provide affordable housing, along with all other necessary planning contributions. Each component of affordable housing supply was re-analysed post Deposit Stage and the Replacement LDP is now expected to deliver a total of 1,595 affordable dwellings across the County Borough in order to contribute to the level of housing need identified by the LHMA. This is summarised by supply component below.

Components	Number of Affordable Housing Units
Total Completions (large and small)	367
Units under construction	65
Units with planning permission (large sites)	172
New Housing Allocations	951
Large windfall sites (10+ units)	40
Small windfall sites (<10 units)	0
Total LDP Affordable Supply	1,595

This target is realistic, grounded in robust viability and deliverability evidence and has been considered in tandem with the Housing Trajectory’ site specific phasing.

b) Is the threshold of 10 units or more realistic and based on robust evidence?

Yes, the 10-unit threshold was determined in consultation with the Viability Steering Group as part of the Pan-Wide Viability Assessment 2021. A range of scenarios were appraised to determine the level of affordable housing different sized sites could support in different Housing Market Areas. For those Housing Market Areas considered viable, an affordable housing contribution was deemed appropriate on sites of 10 units or more.

Potential for an affordable housing policy was considered for sites smaller than 10 dwellings as part of the Plan-Wide Viability Study 2021. However, application of a broad percentage to sites of this scale increasingly resulted in 'partial unit' contributions and presented bespoke viability issues, where rounding up to one dwelling had a negative viability impact and would act as a barrier to small schemes coming forward. This factor combined with more widely varying build costs, bespoke property types, atypical sale values and alternative land value aspirations all render application of a generic affordable housing policy less appropriate for sites below 10 units.

c) How will the affordable housing target be delivered?

The affordable housing target will primarily be delivered on allocated sites and existing sites with planning permission that already form part of the housing land bank. A minor number of affordable units (40) is expected to be delivered on windfall sites within the settlement boundaries. The LPA considers on-site provision to be the optimal means of delivering affordable housing in order to foster sustainable, balanced, mixed-tenure communities across the County Borough. Off-site provision and/or financial contributions will only be accepted in lieu of on-site provision in exceptional circumstances. Refer to Background Paper 5: Affordable Housing.

d) Will a greater percentage of affordable housing be sought on strategic sites? and if so why?

Yes, site-specific viability testing has demonstrated that the strategic sites are capable of supporting a higher affordable housing contribution than on smaller windfall sites in the same housing market areas. The only exception is SP2(1) Porthcawl Waterfront, which is considered capable of providing the same percentage affordable housing contribution as in the general market area (i.e. 30%). This evidence has informed the individual, site-specific affordable housing policies outlined within Policy COM3, and further justifies selection of these strategic sites as proposed allocations.

e) Is Policy COM2 necessary or are these requirements addressed in Policies COM3, COM4 and COM5?

Policy COM2 was intended to structure the affordable housing section of the Replacement LDP and set the context for application of Policies COM3, COM4 and COM5, although it is not strictly necessary as the requirements are addressed in the latter three policies.

4. How will off-site or commuted sum contributions for affordable housing be secured and managed? What mechanisms are in place to ensure that the level of contributions sought are appropriate?

Off-site or commuted sum contributions for affordable housing will be secured through s106 agreements and managed via appropriate s106 triggers. Policy COM4 sets out four criteria to ensure the level of contributions sought are appropriate, ensuring that the value of the contribution equates to what would otherwise have been secured on-site, thereby enabling no fewer units to be delivered off-site. Appropriate 'future proof' value clauses will be utilised within s106 agreements to ensure appropriate contributions are provided at the time the respective developments come forward.

5. Is the spatial distribution of affordable housing sound and does it adequately reflect local needs?

The locational housing need identified in the LHMA informed the selection of the most appropriate spatial strategy from the outset of plan preparation. The LHMA revealed significant shortfalls of affordable housing provision within Bridgend, Pencoed, Porthcawl and the grouped settlement of Pyle, Kenfig Hill and North Cornelly. Moderate housing need was also identified in Maesteg and the Llynfi Valley, as was the need to diversify the dwelling stock within Valleys Settlements. The spatial strategy is therefore considered the optimal means of spatially addressing these shortfalls in provision and seeking to counter-balance the mismatch between supply and demand. The spatial distribution of affordable units over the whole plan period is summarised in the table below by Growth Area and component of affordable housing supply.

Growth Area	Replacement LDP Affordable Housing Components 2018-2033					
	Complete	U/C	Existing Planning Consent	New Allocations	Windfall Sites	Total
Bridgend	161	45	65	350	11	632
Maesteg and the Llynfi Valley	37	0	0	56	10	103
Pencoed	40	0	36	161	0	237
Porthcawl	34	10	8	234	2	288
Pyle, Kenfig Hill and North Cornelly	27	0	21	150	3	201
Valleys Gateway	52	0	42	0	4	98
Local Settlements	16	10	0	0	10	36
Total	367	65	172	951	40	1595

Evidently, the highest quantities of affordable housing provision are channelled towards Bridgend as the Primary Key Settlement and highest housing need area in the County Borough. The Replacement LDP will also deliver significant quantities of affordable housing in the other high housing need areas and Main Settlements of Maesteg, Pencoed, Porthcawl and the grouped settlement of Pyle, Kenfig Hill and North Cornelly. More modest affordable housing provision is planned for the Valleys Gateway, although over 50% of this provision has already been delivered. The Replacement LDP does not seek to apportion significant quantities of development towards this area due to transport capacity issues and the fact that the identified housing need is lower. A smaller proportion of affordable housing is planned in Local Settlements, recognising the fact that their propensity to accommodate significant development is more limited, yet still providing opportunities to meet smaller scale housing need.

Focussing the majority of sustainable growth within vicinities that exhibit high levels of housing need will help maximise opportunities to secure additional affordable housing through the planning system to help combat the shortfall in provision. As such, the spatial distribution of affordable housing is considered sound and adequately reflects local needs. Refer to Background Paper 3: Spatial Strategy Options and Background Paper 5: Affordable Housing.

6. Are the requirements of Policy COM5 appropriate and consistent with the requirements of national planning policy?

It is acknowledged that Planning Policy Wales identifies the release of exception sites can be “within or adjoining” existing settlements, whereas Policy COM5 only permitted exception sites outside settlement boundaries at Deposit Stage. In

addition, Technical Advice Note 2 requires local authorities to set out the definition of 'local need' in the LDP and the area within which the need will be considered 'local'.

Policy COM5 has since been amended within the Submission Version of the Replacement LDP to include "within or adjoining" within the policy wording. The definition of 'local need' has also been included in the reasoned justification to ensure the policy is appropriate and consistent with the requirements of national planning policy.

a) Is restricting the number of affordable dwellings that can be constructed on exception sites to 10 realistic or appropriate?

Yes, Policy COM5 is both realistic and appropriate to enable delivery of small levels of affordable housing in response to a pressing locally identified need. The Replacement LDP will enable delivery of the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. COM5 does not seek to promote large quantities of affordable housing development outside of settlement boundaries to contribute to this target, rather provide a mechanism to meet pressing housing need in limited, exceptional circumstances. Since Deposit Stage, the supporting text within the Replacement LDP has been expanded to further clarify this point. Any resultant development will still need to have reasonable access to local community services and facilities in nearby settlements, meet the specified criteria and other relevant policies of the LDP.

Large concentrations of affordable housing can lead to stigmatisation, social disintegration and unstable communities. A 10-unit cluster is considered the maximum appropriate size for a sustainable cluster of affordable housing on larger, mixed-tenure housing developments and is equally applicable to an exception site. This limit has been informed by routine discussions with RSL housing managers that operate across the region. Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities, particularly in a countryside setting.

Proposed Policy COM5 will provide a means of meeting very specific identified housing need, small in scale and exceptional in circumstance. This restriction is realistic in that it follows community cohesion principles and follows best practice in delivering sustainable clusters of affordable housing in a manner that integrates with the wider community. It is also appropriate in that it will safeguard against undue concentrations of affordable housing within a countryside setting, while providing a mechanism to respond to a small yet

pressing housing need identified by the LHMA and/or Local Housing Authority. Refer to Background Paper 5: Affordable Housing.

Gypsy and Traveller Accommodation

7. Is the Gypsy and Travellers Accommodation Assessment (GTAA) based on robust and credible evidence and sufficient to inform the Plan's strategy?

Yes, the refreshed GTAA was completed in 2020 to replace the previous GTAA for Bridgend County Borough that was published in 2016. It was completed following Welsh Government Guidance and is based on robust and credible evidence, having utilised a combination of desk-based research, stakeholder engagement and consultation with members of the Travelling Community. The refreshed GTAA provided a detailed understanding of the accommodation needs of the Gypsy and Traveller population in Bridgend County Borough to inform the requirement for additional pitches over the Replacement LDP period.

a) What is the status of the most recent GTAA?

The GTAA was approved by Cabinet and submitted to Welsh Government for approval in December 2020, in order to ensure sufficient time for formal sign off by the relevant Member of the Senedd prior to Deposit Stage consultation. Initial feedback was received from Welsh Government in April 2021, follow up meetings were held throughout May 2021 and the Council responded to all questions raised. However, formal sign-off of the GTAA was not completed prior to consultation on the Deposit Replacement LDP (carried out between 1st June 2021 to 27th July 2021).

Although the Council has submitted the GTAA in accordance with s102 of the Housing (Wales) Act 2014, no further feedback or formal resolution has been received from Welsh Government to date. The Council has remained in dialogue with Welsh Government on this matter and remain committed to progressing the GTAA to formal approval.

b) How has the need for 7 new permanent Gypsy and Traveller pitches over the plan period been identified? And how will this need be met?

The need for new permanent pitches has been identified through the 2020 GTAA using a combination of primary and secondary research in accordance with Welsh Government Guidance. The Assessment was guided by a Project Steering Group, which included a range of local stakeholders. A total of 3 interviews were completed with Gypsies and Travellers living on authorised sites in Bridgend County Borough. In addition, an interview was completed with a Travelling Showperson household living at a site in Porthcawl, an interview

was completed with a household living in bricks and mortar, and an interview was completed with a household living on a public site in another local authority with links to Bridgend. These primary census-style interviews proved key in identifying the level of need; 7 pitches up until 2033 (originating from three separate families).

Since the draft GTAA was completed, Family A (one pitch need) has relocated to another authorised site in the County Borough (planning application P/17/891/FUL refers) and no longer requires assistance from the Local Authority.

Family B (three pitch need) already resided on an authorised site at the time the GTAA was conducted, and the existing consent already allowed for one additional caravan on site in the form of a mobile home. Family B therefore submitted a planning application to intensify their existing site and provide space to accommodate the net need identified. Planning consent was granted to further increase the net number of caravans on site by two (one additional mobile and one additional static), thereby enabling up to four households to reside on the site (planning application P/21/677/FUL refers). Detailed discussions between the LPA and Family B have confirmed that this consent will enable the family's accommodation needs to be met completely and no further assistance is required from the Local Authority.

Detailed discussions between the LPA and Family C (three pitch need) confirmed the family were settled in bricks and mortar within the area, although they are members of the Showmen's Guild of Great Britain and would prefer to reside on a private showperson site. Family C also reported ownership of a 0.2 hectare site off Old Coachman's Lane, Court Colman that they considered suitable to meet their needs. While the site is in a countryside location, there is considered to be a lack of suitable, sustainable and deliverable alternatives within or adjacent to existing settlement boundaries that are in the Council's existing ownership. In addition, no other candidate sites have been submitted for this use. Therefore, based on the sequential approach outlined in Circular 005/2018, the site is considered the suitable to propose for allocation in the Replacement LDP, via Policy SP7(1). The proposed allocation is sufficient in scale to meet the remaining identified need and there are not considered to be any impediments to delivery.

In summary, four pitches of the seven-pitch need identified has already been met through two planning consents and proposed allocation SP7(1) will meet the remaining three pitch need. Refer to Background Paper 18: Gypsy and Traveller Site Options.

8. Does Policy COM8 provide a clear and consistent framework for assessing proposals for additional Gypsy and Travellers sites, and is it consistent with national policy?

Yes, COM8 has been developed to ensure consistency with Circular 005/2018 and other national planning policy requirements, following the good practice guidance on criteria-based policies for Gypsy and Traveller Sites. Policy COM8 provides a clear and fair rationale for the determining of Gypsy and Traveller site planning applications. This includes criteria for development of sites outside of settlement boundaries if there are no realistic, suitable sites available within or adjacent to settlement boundaries. This strictly conforms with the approach outlined in national policy and will provide a clear and consistent framework for assessing proposals for additional Gypsy and Traveller Sites. This will ensure the Replacement LDP is flexible to enable provision for any additional need arising throughout the Plan period (over and above that identified in the GTAA).

9. Is the Gypsy and Traveller site allocated under Policy SP7(2) at Land adjacent to Bryncethin Depot sound and capable of being delivered during the plan period?

Land adjacent to Bryncethin Depot SP7(2) is now no longer considered necessary to allocate for a Gypsy and Traveller site and has been removed from the Submission Version of the Replacement LDP.

The GTAA identified need for 7 pitches for Gypsies and Travellers up until 2033, stemming from three separate families. Since then, Family A (one pitch need) has relocated to another authorised site in the County Borough (planning application P/17/891/FUL refers) and no longer requires assistance from the Local Authority. Family B has also received planning consent to intensify their existing site and meet their three-pitch need (planning application P/21/677/FUL refers). The proposed allocation Land off Old Coachman's Lane (SP7 (1)) is considered appropriate to meet the three-pitch need remaining from Family C. As such, the other proposed allocation at Bryncethin (SP7(2)) is no longer considered necessary. Refer to Background Paper 18: Gypsy and Traveller Site Options.

a) What is the current use of the allocated?

The allocation proposed at Deposit Stage (SP7(2)) is partially situated within an extant mixed used allocation for employment, housing and retail (existing adopted LDP Policy PLA3(14) refers, of which, the latter two elements have not come forward).

b) What is the proposed use of the allocated site?

Land adjacent to Bryncethin Depot SP7(2) is now no longer considered necessary to allocate for a Gypsy and Traveller site and has been removed from the Submission Version of the Replacement LDP.

c) What are the constraints affecting the site, and are these constraints significant obstacles to development within the Plan period?

Land adjacent to Bryncethin Depot SP7(2) is now no longer considered necessary to allocate for a Gypsy and Traveller site and has been removed from the Submission Version of the Replacement LDP.

d) What are the mechanisms and timescales for delivering the site?

Land adjacent to Bryncethin Depot SP7(2) is now no longer considered necessary to allocate for a Gypsy and Traveller site and has been removed from the Submission Version of the Replacement LDP.

e) Is the allocation of the essential to ensure the soundness of the Plan?

No, Land adjacent to Bryncethin Depot SP7(2) is now no longer considered necessary to allocate for a Gypsy and Traveller site and has been removed from the Submission Version of the Replacement LDP.