

BRIDGEND
REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)
EXAMINATION

SCHEDULE OF MATTERS, ISSUES AND QUESTIONS

Matter 2: Active, Healthy, Cohesive, Inclusive and Social Communities – Housing and Greenspace

Issue - Is the provision and distribution of housing soundly based, supported by robust and credible evidence and is it consistent with national policy? And will it be met during the Plan period?

Housing Provision

1. Is the housing requirement figure identified in Policy SP6 appropriate?

Yes, the housing requirement figure is considered appropriate. It is based on a balanced and sustainable level of economic growth that will facilitate the continued transformation of the County Borough into a network of safe, healthy and inclusive communities that connect more widely with the Cardiff Capital Region and Swansea Bay Region. This housing requirement is deemed the most appropriate, sustainable means to deliver the LDP Vision and Objectives as justified within Background Paper 2: Strategic Growth Options (SD35). All reasonable alternatives have also been duly assessed under the SA process.

a) How has the requirement figure of 7,575 been derived? and is it based on robust and credible evidence?

The housing requirement is derived from a POPGROUP demographic scenario that uses an ONS 2019 Mid-Year Estimate base year and calibrates its migration assumptions from a 6-year historical period (2013/14–2018/19), an approach consistent with ONS methods. This period captures the more positive socio-economic and demographic trends witnessed post the Great Recession and prior to the pandemic, which the Replacement LDP seeks to continue. Maintaining this trajectory will lead to more established households (particularly around the 35-44 age group) both remaining within and moving into the County Borough, coupled with less outward migration across other economically active age groups. This will encourage a more youthful, skilled population base to counter-balance the ageing population, resulting in an overall population increase of 9.4% or 13,681 people over the plan period. This level of growth will also enable delivery of 1,595 affordable homes, thereby maximising delivery in

combination with other sources of affordable housing supply in the context of plan-wide viability. This housing requirement is deemed the most appropriate, sustainable means to deliver the LDP Vision and Objectives as justified within Background Paper 2: Strategic Growth Options (SD35). All reasonable alternatives have also been duly assessed under the SA process.

b) In identifying the requirement figure, has adequate regard been paid to the most recent Welsh Government household and population projections?

Yes, the latest (2018-based) suite of WG household and population projections provided a refreshed baseline for the LDP demographic evidence base at Deposit Stage. They were incorporated and analysed within the LDP Demographics Update Addendum (2020, SD68) alongside a range of other growth scenarios, including trend and housing-led alternatives. These additional scenarios also incorporated the 2019 mid-year estimate, published by ONS in June 2020. This refreshed demographic evidence was considered and evaluated to reaffirm that the Mid Growth Option, as justified at Preferred Strategy Stage, remained appropriate to underpin the Replacement LDP. Due regard has therefore been paid to the most recent Welsh Government household and population projections in identifying the housing requirement figure.

At Deposit Consultation Stage, Welsh Government commented, “the level of household growth proposed in the deposit LDP is 7,575 dwellings over the plan period, an uplift of 1,905, or 33% over the 2018 principal projections. This degree of aspiration aligns with Bridgend being within a national growth area”.

c) Have alternative housing growth scenarios been considered? if so, why have they been discounted, and why has the preferred option been chosen?

Yes, the full suite of WG’s 2014-based demographic scenarios and alternatives were initially analysed to inform three growth options (Low, Mid and High) at Preferred Strategy stage. These options were selected on the basis of being representative of identified scenarios, reasonable in relation to the evidence base and sufficiently diverse to enable different strategic planning responses. They enabled more detailed analysis into how different levels of growth aligned with the issues the Replacement LDP is seeking to address, ultimately informing the Preferred Strategy’s housing requirement.

WG's 2018-based population and household projections were subsequently published and incorporated into the Replacement LDP's demographic evidence base at Deposit Stage. These projections were evaluated alongside a range of other growth scenarios, including trend and housing-led alternatives, which also incorporated the 2019 mid-year estimate, published by ONS in June 2020. The implications of this refreshed demographic evidence were considered to determine whether the Mid Growth Option, as justified at Preferred Strategy Stage, remained appropriate to underpin the Replacement LDP. Background Paper 2: Strategic Growth Options (SD35) considers and evaluates this range of growth scenarios in the context of the Replacement LDP's Vision, Aims and Objectives to justify the most appropriate housing requirement.

Lower growth options were discounted as they were considered overly influenced by recession laden trends. A derived housing requirement would lead to significant out-migration amongst economically active households and would result in increasingly ageing local population. This could impair the County Borough's ability to attract and retain employers, thereby hampering economic growth and prosperity. Lower growth options would also lead to a reduction in affordable housing provision and could unduly constrain housing supply by reducing the average build rate. While there would be less need to develop greenfield sites, lower growth options would not deliver significant long term economic well-being or enhanced supporting infrastructure and services for the local population to utilise. For these reasons, such options were not considered optimal to provide a sufficient level of housing development and employment growth to underpin the Replacement LDP. Proceeding on this basis would render it difficult to deliver against the range of issues the Plan is seeking to address.

Higher growth options were predicated on significantly high and unprecedented levels of net migration to justify a sustained upturn in residential completions. These options were discounted as they were considered to place too much emphasis on outright economic growth fuelled by in-migration and could necessitate allocation of excessive greenfield residential sites on the periphery of settlements. A derived strategy would be likely to result in an imbalance between household growth and job creation, thereby promoting car-dependency, placing pressure on existing infrastructure, encouraging out-commuting and necessitating unsustainable patterns of movement. This could also lead to the most profitable greenfield allocations being 'cherry picked' for development on the periphery of settlements at the expense of more placemaking-led sustainable urban extensions and brownfield regeneration schemes. Such an outcome would be contrary to national policy. Higher growth options were therefore considered less conducive to balancing the four

strategic objectives and achieving an alignment between housing development, employment provision, economic growth and sustainable development.

The Preferred Growth Option was considered likely to perform best by supporting economic growth, enabling the delivery of key infrastructure, securing affordable housing and improving connectivity without resulting in over-development. This is predicated on achieving an equilibrium between dwelling and employment provision in a manner that will complement existing centres by linking new homes to jobs and services via sustainable, multi-modal forms of transport. This will deliver against the full range of issues the Replacement LDP is seeking to address, notably achieving sustainable patterns of growth, minimising out-commuting, supporting existing settlements and helping to deliver the ambitions of the Cardiff Capital Region and Swansea Bay Region.

At Deposit Consultation Stage, Welsh Government commented, “the level of household growth proposed in the deposit LDP is 7,575 dwellings over the plan period, an uplift of 1,905, or 33% over the 2018 principal projections. This degree of aspiration aligns with Bridgend being within a national growth area. This is supported by 71.9ha of employment, looking to deliver 7,500 jobs, thereby retaining the younger cohort of employees. Collectively, these approaches support Bridgend as having a key role in the national growth area, aligning with the NDF”. Equally, there was broad support from the development industry for the housing requirement as a minimum figure at Deposit Consultation Stage.

d) Has the requirement figure been informed by a robust assessment of the main local influences on housing demand in Bridgend including, household formation size, migration levels, and vacancy rates?

Yes, the main local influences on housing demand in Bridgend have been considered as part of the Demographic Analysis and Forecasts Report (2019,SD67) and LDP Demographics Update Addendum (2020, SD68).

Sensitivity analysis on household formation has been undertaken across the demographic scenarios, configured using comparative membership rate assumptions from the WG 2008-based, 2014-based and 2018-based household projection models. This illustrated how changes to household membership rates and household sizes influence the level of household and dwelling growth required to support the estimated change in population. The proposed housing requirement has been informed by the latest demographic evidence. Household growth has been estimated using household membership rate assumptions from the WG’s 2018-based household projection model.

Equally, the impact of internal and international migration has been carefully examined as part of the 'components' of population change for Bridgend. Alternative trend scenarios using variant migration assumptions were developed and compared to the WG 2014-based and 2018-based benchmark (principal) scenarios. These alternative scenarios were configured to consider the impact of alternative migration assumptions on future population, housing and employment growth, taking account of internal migration rates and international migration flow assumptions from a range of different periods. The proposed housing requirement is derived from a POPGROUP Scenario that Uses an ONS 2019 Mid-Year Estimate base year and calibrates its migration assumptions from a 6-year historical period (2013/14–2018/19). This scenario reflects a positive socio-economic period post the Great Recession, yet pre the pandemic. This period witnessed sustainable population growth, in part linked to the number of dwelling completions across the County Borough, which the Replacement LDP seeks to continue.

A dwelling vacancy rate of 4.8% has also been applied to model the relationship between households and dwellings, derived from 2011 Census statistics.

2. Is the housing land supply figure identified in Policy SP6 appropriate?

Yes, the housing land supply figure is considered appropriate and has been informed by site-specific evidence on deliverability, viability and phasing analysis in consultation with the Housing Trajectory Stakeholder Group. This incorporates an appropriate level of flexibility to ensure delivery of the Anticipated Annual Build Rate (AABR) throughout the plan period. Refer to Background Paper 4: Housing Trajectory (SD37).

a) How has the supply figure of 9,207 been derived? and is it based on robust and credible evidence?

The housing trajectory demonstrates that the housing requirement of 7,575 dwellings is comfortably deliverable during the 15-year LDP period from 2018 to 2033. This incorporates an appropriate level of flexibility to ensure delivery of the AABR throughout the plan period. Refer to Background Paper 4: Housing Trajectory (SD37).

A purposely large flexibility allowance (20%) was included at Deposit Stage and embedded into the Replacement LDP's total housing provision (9,207 dwellings) following consultation with the Housing Trajectory Stakeholder Group. This large flexibility allowance was chosen specifically to enable the AABR to remain comfortably deliverable in the event that a significant site failed to come forward as anticipated at Deposit Consultation Stage.

At Deposit Stage, Parc Afon Ewenni was proposed as a ‘rollover’ allocation and incorporated in the 2021 Housing Trajectory. However, the revised Technical Advice Note 15, supported by the new Flood Map for Planning, since revealed substantial flood risk issues across the site. As such, Parc Afon Ewenni can no longer be relied on to contribute to delivery of the housing requirement and has been removed from the housing trajectory as a housing allocation post Deposit Stage. The trajectory was initially constructed with enough flexibility to sustain the loss of a site of this scale without impacting upon delivery of the housing requirement. Refer also to the Candidate Site Assessment (2022, SD64).

A revised flexibility allowance (of 10%) has now been included within the housing trajectory, which has been embedded into the Submission Version of the Replacement LDP’s total housing provision (8,335 dwellings). The level of flexibility was re-considered carefully post Deposit Stage. Given the extent and robustness of deliverability evidence underpinning each proposed allocation, 10% is now considered sufficient to ensure the AABR will remain deliverable throughout the plan period. This flexibility allowance has been included to ensure the Plan will remain effective if a significant unforeseen scenario, such as delays to several strategic sites, should occur. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes, whilst still enabling the housing requirement to be delivered.

At the most recent Housing Trajectory Stakeholder Group (held on 27/05/2022), there were no outstanding matters of disagreement on the completions data or timing and phasing of sites in the plan period. Equally, all strategic site promoters are party to a Statement of Common Ground (dated 20/12/2022, SD241) that confirms all signatories unanimously support the RLDP and consider the strategic allocations sustainable, viable and deliverable in accordance with the submitted housing trajectory.

b) What is the make-up of the housing land supply?

As detailed within Background Paper 4: Housing Trajectory (SD37), the housing land supply comprises the following components:

Total Completions (large and small)	1,650
Units under construction	208
Units with planning permission (large sites)	747
New Housing Allocations	4,652
Large windfall sites (10+ units)	396
Small windfall sites (<10 units)	682
Total Housing Provision	8,335

c) Is the Plan over reliant on the delivery of the strategic development sites? and should more non-strategic sites be allocated?

Identification of appropriate strategic sites has been undertaken in accordance with the Site Search Sequence and other requirements set out in Planning Policy Wales, as documented in supporting evidence to the Plan. This includes the Candidate Site Assessment (2022, SD64), Background Paper 3: Spatial Strategy Options (SD36), Background Paper 4: Housing Trajectory (SD37) and Background Paper 15: The Best and Most Versatile Agricultural Land (SD48).

50% of the total housing provision within the plan is attributed to strategic sites, with the remainder comprising new smaller housing allocations, existing sites with planning permission, small windfall and large windfall sites. Therefore, the plan is not considered over reliant on strategic sites on this basis and there are a range of alternative housing supply components within and to balance the housing trajectory.

The quantum of development apportioned to strategic sites is closely linked with the need to facilitate delivery of new supporting infrastructure to accompany the proposed growth. The five strategic sites proposed for allocation will help create sustainable communities that will incorporate a mix of complementary uses, deliver improvements to existing infrastructure and provide new supporting infrastructure. This latter factor is particularly notable given the school capacity issues across the County Borough and the need for new sites to be significant enough in scale to support provision of a new primary school as a minimum. All proposed strategic sites have demonstrated they are capable of delivering new primary schools on-site; a feat that would prove unviable for smaller sites to deliver. Equally, and in response to the findings of the Strategic Transport Assessment (2022, SD95, see also SD56), the strategic sites will make a significant contribution to the strategic highway network, with notable upgrades to Broadlands and Ewenny roundabouts to resolve transport capacity issues. This holistic approach would not be possible if several non-strategic sites were proposed for allocation instead. A strategy more reliant on smaller sites could risk exacerbating localised infrastructure problems and impacting negatively on local communities without any viable means of resolution.

All strategic sites key to the delivery of the LDP have been subject to greater evidence requirements to support their delivery, including schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs. This has provided a high degree of confidence that the sites proposed are realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. While 50% of the Replacement LDP's

housing provision is attributable to strategic sites, their evident deliverability and contribution to supporting infrastructure is considered to override any concerns regarding 'over reliance'. This in addition to the range of other forms of housing that balance the housing trajectory.

Moreover, an appropriate flexibility allowance (10%) has been embedded into the Replacement LDP and the basis for which is set out in Background Paper 4: Housing Trajectory (SD37). The flexibility allowance recognises the fact that there may be certain specific circumstances, unknown at the plan making stage, that delay the delivery of sites, notwithstanding the robust frontloading of site delivery evidence. This allowance has been chosen specifically to enable the Replacement LDP's housing requirement to remain deliverable in the event that strategic sites fail to come forward as anticipated at this point of plan preparation. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration and involvement with a range of stakeholders at a Stakeholder Group Meeting. As documented within Background Paper 4: Housing Trajectory (SD37), there were no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period (including those sites with planning permission and new housing allocations) following conclusion of the latest Stakeholder Group Meeting.

In summary, it is not considered appropriate to allocate more non-strategic sites and place a greater reliance on a mix of smaller sites. Several sites of this scale are far more likely to have an adverse impact on local communities by exacerbating local infrastructure problems and it can be more difficult for such sites to provide their own supporting infrastructure until they reach sufficient critical mass. As noted in the Plan-Wide Viability Assessment (2021, SD81), sites of several hundred units can pose their own viability issues for this very reason. Therefore, the Replacement LDP has only proposed several smaller site allocations where capacity was clearly demonstrated to accommodate the respective level of growth within the settlement and/or necessary facilities and infrastructure improvements could be provided in support of the development. The final selection of proposed allocations, and accompanying justification, is provided in the Candidate Site Assessment (2022, SD64).

d) Is the estimated yield of units from committed and windfall sites realistic and based on robust evidence? and has a non-delivery allowance been defined and applied?

The estimated yield from committed sites with planning permission is based on a robust assessment of all existing landbank commitments, which has also been subject to detailed scrutiny by the Housing Trajectory Stakeholder Group. After considering all sites that demonstrate a high prospect of short-term

delivery, a total of 955 dwellings were incorporated into the Land Bank Commitments component of housing supply, 208 dwellings of which were already under construction. All dwellings within this total stem from sites that have commenced or are shortly due to commence development as confirmed by the respective developers. As shown in the table below, 70% these completions are expected to come forward in the next two financial years (2022/23 to 2023/24) alone. Expected completions after this point primarily stem from one existing large housing allocation (Land off Maesteg Road, Tondy), the delivery forecast for which has been confirmed by Llanmor Homes.

Year	22/23	23/24	24/25	25/26	26/27	27/28	28/29
Forecasted Dwelling Completions	406	254	70	60	60	60	45

The Housing Trajectory Stakeholder Group raised no objections to including the entire forecast of Land Bank Commitments within the housing trajectory and approved the forecast of completions (refer to Background Paper 4: Housing Trajectory, SD37). On this basis, a further non-delivery allowance is not considered necessary. This reflects the stringency of site scrutiny by both the LPA and the Stakeholder Group plus the certainty regarding short-term delivery.

The estimated yield from windfall sites is based on robust evidence concerning past trends and a detailed analysis of urban capacity within settlement boundaries. The extrapolation rate is based on a balanced rate of completions to avoid being skewed by particularly high or low trends. Therefore, the fifteen-year average over the whole existing LDP period (2006/07 to 2020/21) was considered the most robust for this purpose as this period encompasses the recession, the subsequent repercussions and the following years of economic recovery. This is especially given the fact that the Replacement LDP seeks to broadly continue with the existing LDP's Regeneration-Led Strategy (along with some additional sustainable growth) and also maintain similar settlement boundaries. An Urban Capacity Study (UCS, 2022, SD97) was published alongside the Replacement LDP to provide further analysis of the potential urban capacity of the County Boroughs' settlements for housing to evidence the expected small and windfall site allowance rate. This UCS identifies more than sufficient capacity within the proposed settlement boundaries to accommodate this particular component of housing supply. It therefore demonstrates (in

addition to past trends) that the small and windfall site allowance rate utilised in the Replacement LDP is both realistic and deliverable. It also serves as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP.

e) Should details of the committed housing sites be included in the Implementation and Deliver Appendix?

All land bank commitments are included in Table 7 of the Written Statement (SD1) and detailed within the Housing Trajectory appended to the Replacement LDP, following the guidance within Edition 3 of the Development Plans Manual. As these sites already benefit from planning consent and are already under construction or due to be delivered in the very short-term, it is not considered necessary to also include them within the Implementation and Delivery Appendix. Their delivery will be monitored in accordance with the respective planning consents and s106 agreements.

f) How has the flexibility allowance of 20% been defined? And is it based on robust and credible evidence?

Refer to response to 2a)

g) What role will Place Plans play in the delivery of housing?

The Replacement LDP recognises the role that Place Plans can have in assisting with identifying small, local development sites that reflect local distinctiveness and address local, specific community scale issues. Place Plans are to cover a community area and their preparation should ideally, although not exclusively, be led by Town and Community Councils and/or related steering groups. This will allow local groups to take the initiative and help promote (i.e. via development briefs) small, locally distinctive developments at a scale commensurate with the respective settlement and in accordance with the Replacement LDP. No assumptions have been made regarding the expected quantum of housing to be delivered through Place Plans and any respective proposals will have to conform with the wider policies of the Replacement LDP.

3. Is the rate of delivery contained in the housing trajectory realistic, and based on robust and credible evidence?

The total housing provision, and spatial distribution thereof, has been subject to site-specific phasing analysis to enable development of the housing trajectory. The trajectory was prepared initially through close dialogue with the respective site-promoters, followed by effective collaboration with a range of stakeholders at

several annual Stakeholder Group Meetings. The Stakeholder Group was established prior to Deposit Stage to discuss the timing and phasing of all sites with a planning permission or an allocation in the plan, specifically to:

- Ensure completion figures are up to date and recorded correctly for large and small sites
- Consider the anticipated annual delivery rates for sites with planning permission
- Consider the anticipated annual delivery rates for housing allocations

At the latest Stakeholder Group, no objections were raised regarding the completion figures, anticipated annual delivery rates for sites with planning permission and the anticipated annual delivery rates for the proposed housing allocations. As such, there are no outstanding matters of disagreement on the completion figures or the timing and phasing of sites in the plan period, all of which have been approved by the Stakeholder Group. Refer to Background Paper 4: Housing Trajectory (SD37).

4. Will the Plan deliver the housing requirement?

Yes, the Housing Trajectory demonstrates the Plan will deliver the housing requirement. The timing and phasing of sites has been approved by the Housing Trajectory Stakeholder Group. All proposed allocations have been subject to rigorous viability and deliverability testing in collaboration with specific site promoters. This process has certified that the costs of the development requirements and placemaking principles set out in site specific policies coupled with the Council's aspirations for delivering high-quality new communities are realistic and deliverable on each site. The sites are considered attractive to the market and deliverable during the plan period (refer to Background Paper 4: Housing Trajectory, SD37).

a) Are the site allocations available and deliverable within the anticipated timescales? Are the allocations supported by a robust and comprehensive site assessment methodology, free from significant development constraints and demonstrated to be economically viable?

All allocations have been proposed based on the outcome of the Candidate Site Assessment (2022,SD64), their compatibility with the National Sustainable Placemaking Outcomes, the Gateway Test applied to the site search sequence and the Sustainable Transport Hierarchy, supplemented by an SA/SEA analysis.

The Candidate Site Assessment (2022, SD64) analysed the feasibility of potential candidate sites in the context of the Preferred Growth and Spatial

Strategy. Stage 1 provided the opportunity for site promoters to demonstrate whether any major constraints (identified by the SA) could be overcome. Sites progressing to Stage 2 were examined in terms of their deliverability, general location, neighbouring land uses, existing use(s), accessibility, physical character, environmental constraints, and opportunities. In addition, there was an assessment of the policy context, together with the local geographical context, including known infrastructure issues. During Stage 3, the Council obtained the views of a limited number of specific consultation bodies in respect of those sites considered suitable for future development and possible allocation. As a result of this assessment, a range of sites were proposed for allocation within the Replacement LDP (Stage 4), acknowledging the conclusions drawn from Stage 2 and comments received from Stage 3.

All new proposed allocations are considered to demonstrate delivery in accordance with the Development Plans Manual and have been subject to significant proportionate evidence requirements to support their delivery. This includes schematic frameworks, phasing details, key transport corridors, critical access requirements, design parameters, s106 requirements, infrastructure and costs.

The proposed allocations have also been subject to rigorous viability testing in collaboration with specific site promoters. All proposed allocations are supported by independent, site-specific viability assessments using the Burrows-Hutchinson Ltd Development Viability Model; an approach endorsed collectively by Welsh Government, the South East Wales Region and South West Wales Region. The appraisals undertaken have been based on realistic and reasonable assumptions concerning costs and values. They demonstrate all proposed allocations are capable of meeting the proposed Replacement LDP policy requirements in full, whilst also providing competitive returns to both the landowner(s) and the developer(s) involved.

This holistic process provides a high degree of confidence that the sites included within the Replacement LDP are available and realistically deliverable, considering the full plethora of associated development requirements, infrastructure provision and placemaking principles necessary to deliver high-quality new communities. Refer to the Potential Strategic Sites Independent Financial Viability Appraisals Report (2021, SD82), Updated Financial Viability Appraisals Addendum - Strategic Sites (2022, SD83) and Background Paper 4: Housing Trajectory (SD37).

b) Should committed sites be allocated? If not, what will happen to such sites if planning permissions lapse?

All land bank commitments are included in Table 7 of the Written Statement (SD1) and detailed within the Housing Trajectory appended to the Replacement LDP. They have been considered as a separate component of housing supply following the guidance within Edition 3 of the Development Plans Manual. It is not considered necessary to allocate committed sites given that many are already under construction or are due to be delivered within the next two financial years. This will facilitate short term delivery in advance of the new proposed allocations starting on site as considered during the housing trajectory's development. At the latest Stakeholder Group, there were no concerns raised regarding the anticipated annual delivery rates for these committed sites, which reflects their short-term deliverability. Refer to Background Paper 4: Housing Trajectory (SD37).

In the unlikely event that planning permissions lapse on any of these committed sites, a specific allocation would not be required in order for them to come forward in accordance with the Replacement LDP. The principle of development has already been established, they are all within designated settlement boundaries and appropriate residential development would not be contrary to the Replacement LDP in principle. On this basis, there are not considered to be any barriers to any applicants re-submitting planning applications on committed sites in the future.

c) Is the Plan's housing strategy sufficiently flexible to respond to changing circumstances?

Despite the extent of frontloading and deliverability evidence, it is acknowledged that there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. A flexibility allowance has therefore been embedded in the Plan to ensure it will remain effective and accommodate any changing circumstances. An appropriate 10% allowance has been specified following assessment of each component of housing supply to ensure there is sufficient flexibility above the housing requirement to account for non-delivery and unforeseen issues. This level of flexibility will ensure the AABR will remain deliverable throughout the plan period even if, for example, several strategic sites are delayed simultaneously. This will allow for the plan and trajectory to be resilient and sufficiently adaptable to deal with any unforeseen changes. Refer to Background Paper 4: Housing Trajectory (SD37).

Moreover, the Urban Capacity Study (2022, SD97) has analysed a plethora of urban capacity sources in accordance with Edition 3 of the Development Plans

Manual. This evidence demonstrates more than sufficient scope to accommodate the trend-based small and windfall site allowance within the proposed settlement boundaries. Small and windfall sites are both important components of housing supply and provide choice and flexibility to accommodate different forms of residential development across the County Borough. The Urban Capacity Study will serve as a useful resource to developers and SMEs who are seeking to identify potential development opportunities not specifically allocated in the Replacement LDP, thereby facilitating a flexible housing strategy.

Housing Distribution and Development

5. Is the spatial distribution of new housing development sustainable and coherent?

Yes, SP1 sets out a clear spatial strategy to help realise the regeneration aspirations and priorities of the Council, whilst balancing the need to deliver future housing requirements up to 2033.

The housing requirement has been distributed to sustainable locations in accordance with the Settlement Hierarchy and Spatial Strategy. Due regard has been had to settlement accessibility, services, facilities and employment opportunities in order to promote sustainable forms of growth and patterns of movement. The Strategy has stringently followed the site search sequence in line with Planning Policy Wales. Previously developed land and/or underutilised sites located within existing settlements have been considered in the first instance, followed by suitable and sustainable sites on the edge of the Primary Key Settlement and Main Settlements. This has ensured that the new proposed housing allocations are geographically balanced with community facilities, services and employment opportunities within existing settlements. Grouping major generators of travel demand together in this manner will help minimise the need for long journeys, reduce reliance on the private car and increase the propensity for residents to walk, cycle and utilise public transport.

The overall spatial distribution of housing (as identified in Table 7 within the Written Statement – SD1) is provided to demonstrate how the Replacement LDP can be delivered spatially, directed by the Settlement Assessment (SD91), LHMA (SD79), Plan-Wide Viability Assessment (SD81) and overall Spatial Strategy. The Strategy is considered most appropriate to maximise delivery of affordable housing in high-need areas as identified by the LHMA, whilst enabling sustainable forms of development that meet the LDP Objectives, minimise pressure on BMV agricultural land and provide scope to address existing infrastructure capacity issues. Background Paper 3: Spatial Strategy Options (SD36) justifies this Strategy through evaluating a range of spatial options, each of which have also been considered as a reasonable alternative and assessed further under the SA process.

The spatial distribution of new housing development is therefore considered sustainable and coherent. At Deposit Consultation Stage, Welsh Government commented, “The Welsh Government has no fundamental concerns on the spatial distribution of housing and employment growth, which is in ‘General Conformity’ with Future Wales”.

a) How will new windfall development within each tier of the settlement hierarchy be assessed and managed?

The Replacement LDP seeks to enable a range of windfall residential developments, framed in the context of the settlement hierarchy to clearly define the spatial distribution of growth. The Urban Capacity Study (2022, SD97) has analysed a plethora of urban capacity sources to identify the level of extant capacity across the County Borough’s settlements in both numeric and spatial terms. This has informed the distribution of growth as identified in Table 7 (SD1), devised in accordance with the Development Plans Manual, to provide certainty as to the likely spatial distribution of windfall sites. The spatial distribution of large and small windfall sites has been estimated based on the proportionate level of urban capacity documented in the Urban Capacity Study (2022, SD97).

Such sites make an important contribution to the overall housing land supply, introducing an element of choice and flexibility into the housing market, and the strategy seeks to enable windfall development within each tier of the settlement hierarchy. This will provide flexible opportunities for development across the County Borough, including within Valleys settlements, where conventional development economics are challenging. It is recognised that alternative initiatives such as co-operative housing, self-build plots and custom build opportunities may be required to enable development to come forward on windfall sites within such environs. Providing any windfall development proposals are located within the designated settlement boundaries, residential uses will be acceptable in principle, subject to assessment against the suite of policies in the Replacement LDP and management through planning conditions and/or s106 agreements.

b) Is the spatial distribution of housing allocations and windfall opportunities consistent with the identified settlement hierarchy?

Yes, the largest quantum of development (42% of the total) is directed towards Bridgend as the Primary Key Settlement and the primary focus for sustainable growth, which is classified as the only ‘Tier 1’ settlement. Significant proportions of development are also proposed within the four ‘Tier 2’ Main Settlements of

Maesteg (9%), Pencoed (11%), Porthcawl (13%) and the grouped settlement of Pyle, Kenfig Hill and North Cornelly (13%). The remaining growth is channelled towards 'Tier 3', which includes the Valleys Gateway and local settlements outside of Growth Areas. This is consistent with the Settlement Hierarchy (informed by the Settlement Assessment Study (2019, revised 2021, SD91) and Spatial Strategy (refer to Background Paper 3: Spatial Strategy Options, SD36). A summary of the spatial distribution of housing is set out in Table 7 within the Written Statement (SD1), which identifies how the Plan's housing requirement figure is to be met through the full range of housing supply strands. Additional supporting information on each component of housing supply is detailed in Background Paper 4: Housing Trajectory (SD37).

The spatial distribution of large and small windfall sites has been estimated based on the proportionate level of urban capacity documented in the Urban Capacity Study (2022, SD97) and is consistent with the identified settlement hierarchy. While windfall sites are not allocated by their very nature, the estimated spatial distribution and accompanying Urban Capacity Study provide enhanced certainty over the likely geographical distribution of windfall sites over the plan period.

6. Will Policy COM6 ensure a balanced mix of house types, tenure and sizes? and is the approach to managing density levels appropriate?

Yes, COM6 seeks to enable a balanced mix of house types, tenure and sizes at sustainable densities that maximise accessibility and use of active travel in accordance with national policy. This is framed around the principle that Sustainable Placemaking, Good Design and density levels should be considered on a site-specific basis rather than through a generic numerical target. Supporting paragraph 5.3.39 emphasises that, "the Council will expect developers to provide an appropriate mix of dwelling sizes and types to meet local housing needs, with reference to the evidence within the latest LHMA. A preponderance of larger dwelling types with four or more bedrooms should be avoided and developments must seek to provide a suitable range of housing types to meet the needs of households in the County Borough".

Policies PLA 1-5 set out further detailed Placemaking Principles and Masterplan Development Principles for the five strategic sites to further ensure a balanced mix of house types, tenures and sizes at a sustainable density, while responding to the site-specific contexts. Concept masterplans have now also been appended to the Submission Version of the Written Statement (SD1) and are provided in Appendix 7 for illustration purposes. These masterplans have been designed with regard to COM6, PLA1-5 and the other policies contained within the Replacement LDP.

As such, COM6 will ensure a balanced mix of house types, tenure and sizes and the approach to managing density levels is considered appropriate in accordance with national policy.

7. Does Policy COM7 provide a clear and consistent mechanism for assessing proposals for houses in multiple occupation?

Yes, Policy COM7 seeks to ensure proposals to convert dwellings into HMOs are assessed as to their appropriateness in order to avoid over intensification of the use within the locality. It seeks to avoid a significant cumulative impact on the character of an area via six clear criteria that provide a consistent mechanism for assessing such proposals. Policy COM7 is therefore considered appropriate in this respect.

Provision of Outdoor Space and Accessible Greenspace

8. Are the requirements of Policy COM10 appropriate and based on robust and credible evidence?

Yes, the requirements of Policy COM10 are considered appropriate and based on robust and credible evidence. All new housing developments will be expected to include an appropriate level of outdoor recreation for public amenity purposes in the interest of Good Design. This is an integral means of delivering several Local Wellbeing Objectives, including to reduce social and economic inequalities and ensure healthy choice in a healthy environment. Policy COM10 is based on the benchmark standards endorsed by Fields in Trust, the National Society of Allotment and Leisure Gardeners Policies and Natural Resources Wales' Green Space Toolkit, for the provision of Accessible Natural Green Space. This approach is recommended in Planning Policy Wales (Edition 11) (see paragraph 4.5.6). The Council will work with developers to maintain an optimal level and balance of good quality outdoor recreation space for all its residents.

The standards required by Policy COM10 are also supported by the Outdoor Sport and Children's Playspace Audit 2021 (see SD80) and the Allotment Audit 2022 (see SD57), which have equally informed and developed the holistic Green Infrastructure Assessment 2022 (see SD72). Further guidance is provided within the Outdoor Recreation Facilities and New Housing Development SPG.

9. Does Policy COM11 provide an effective mechanism for the provision of natural and semi-natural greenspaces? Should the policy include reference to promoting provision through enabling development? and has the site allocated at Waunscil Avenue, Bridgend (Policy COM11(7)) been correctly annotated on the proposals map?

Yes, Policy COM11 provides an effective mechanism for the provision of natural and semi-natural greenspaces. Policy COM11 will promote the provision of accessible, Natural and Semi-Natural Greenspace (including Amenity Green Space) wherever suitable opportunities arise. Further guidance is also provided within the council's Outdoor Recreation Facilities and New Housing Development SPG, which adopts an accessibility standard that no person should live more than 300 metres from their nearest area of natural greenspace as recommended by Natural Resources Wales.

In relation to promoting provision through enabling development, Policy COM11 states that the Replacement LDP will promote the provision of accessible Natural and Semi-Natural Greenspace wherever suitable opportunities arise. Such opportunities include, but are not limited to, appropriate development proposals. However, the proposed change of wording is considered too flexible. Some development proposals may enable greater access to accessible natural greenspace but be unacceptable for other material planning reasons. For this reason, the proposed amendment to Policy COM11 is not considered appropriate.

It's acknowledged that Policy COM11(7) Waunscil Avenue has not been correctly annotated on the proposals map. As such, the proposals map will therefore require an update.