

**WELSH GOVERNMENT**  
**Examination Hearing**  
**Statement**

**Bridgend County Council**  
**Local Development Plan**

**Matter 2**  
**Housing and Greenspace**

**1 March 2023**

## **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?**

The Welsh Government considers the housing requirement (7,575 homes) is realistic, appropriate and is founded on robust and credible evidence. It is also the Government's view that the overall growth levels in the plan have been sufficiently informed by, and are broadly consistent with, the relevant policy requirements in PPW (4.2.3 – 4.2.8) and guidance in the DPM (5.25-5.57).

Our response to Matter 1 also explains our view that the level of housing proposed is in general conformity with Future Wales. The housing requirement of 7,575 dwellings over the plan period represents an uplift of around 1900 dwellings, above the 2018 principal projection. This is supported by 71.9ha of employment, looking to deliver 7,500 jobs, thereby retaining a younger cohort of employees. Collectively, these approaches support Bridgend playing a key role in the national growth area, aligning with Future Wales. The level of growth also aligns with Policy 7 (Future Wales) in respect of the delivery of affordable homes. The proposed level of housing growth (505 dpa) is above the past 5 and 10-year build rates (440 and 460 per annum respectively). This degree of aspiration aligns with Bridgend being within a national growth area.

In arriving at its view, the Government has placed great emphasis on ensuring the housing requirement proposed in the plan can be delivered. PPW (4.2.10 – 11) and the DPM (5.58 -5.74) places great emphasis on development plans being deliverable, including the delivery of housing via robust components of housing supply, articulated through a trajectory. The WG considers the overall level of homes of proposed is aspirational but deliverable. **The merits or otherwise of individual sites, their timing, phasing and delivery will be a matter for the LPA to justify not Welsh Government.**

The Government considers that the relevant projections (2018-based at Deposit) have been adequately taken into account by the Council, along with other relevant policy considerations set out in PPW, in arriving at the chosen growth option / housing requirement. We note the Council has considered the impact of recent emerging 2021 Census data in SD98 as required by PPW.

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

This is for the LPA to explain/justify.

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

This is for the LPA to explain/justify.

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

This is for the LPA to explain/justify.

**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?**

This is for the LPA to explain/justify.

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

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

We note that the Council has updated the overall housing provision in the plan to 8,335 dwellings, a reduction from 9,207 homes at the Deposit stage to reflect deletion of sites due to flood risk and the latest position. We note that the reduction in housing provision has impacted on the level of flexibility in the plan. The level of flexibility (now 10%) will be a matter for the LPA in explain the context of PPW 4.2.10 and the DPM.

We note that the housing figures in the plan have been updated and are now based on an 01<sup>st</sup> April 2022 base date which has been reflected in the Composite Plan (SD27), Updated Housing Trajectory SD37 and Urban Capacity Study (SD97).

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

The WG considers that the plan is clear as to the various components of supply that make up the housing provision, both numerically and spatially and have no fundamental concerns of how this has been presented in the plan (SP1, Table 6, Table 7, COM 1 and Appendix 1 – Housing Trajectory). In summary the plan is clear and accords with the requirements of the DPM in this respect.

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

This is a matter for the LPA.

**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 updated Housing Trajectory (SD37) and the Urban Capacity Study (2022) set out the Council's approach to commitments and the windfall allowance. In preparing the amended trajectory it is noted that there are no outstanding objections from members of the Housing Stakeholder Group (SD37, para 8.2) and all parties agree the timing and phasing of the components of housing supply. Key sites are further supported by SOCGs.

WG considers that the large windfall rates based on a 15-year average is realistic and further supported by the Urban Capacity Study. The Council has correctly disapplied large windfall sites from the first two years from the current base date in the line with the DPM.

In respect of committed sites, the DPM does suggest that a non-delivery allowance may be appropriate for some authorities, or alternatively a site-by-site approach may be used (DPM - Table 18). The Council have undertaken an analysis and have stated that 70% of the land bank' is expected to come forward in the next two years. (SD37 – para 4.2, Table 2) giving certainty that these rates will be achieved. The remaining land bank is made of primarily one large housing allocation at Maesteg Road. The relevant developers (and HSG) are content with these rates. On this basis the WG does not object the approach taken by the Council.

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

Not unless the commitments are key/strategic to delivery of the strategy and warrant this approach. See also our response to 4b. The status, timing and phasing of commitments is already set out in the Housing Trajectory on a site-by-site basis.

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

See answer to Q2a.

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

This is a matter for the LPA.

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

This is for the LPA/industry to answer.

As previous stated, the Council has undertaken a considerable amount of technical work/engagement in line with requirements of PPW and the DPM and there appears to be no outstanding objections from the housing stakeholder group.

#### **4. Will the Plan deliver the housing requirement?**

**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?**

This is for the LPA/site promoter's answer.

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

No. DPM 5.62 'definition of components' states that allocations and commitments should be separated to ensure clarity to plan users of what is 'new' and aid effective monitoring of the plan. However, where the plans strategy is reliant on a strategic housing allocation(s) the total extent of the strategic site should be identified as an allocation, which may include permissions within the total extent, due to the scale of the site. This is because they are integral to the plan and have special status. Other commitments that may or may not lapse over the plan period would be within a settlement boundary where there would be a presumption in favour of permission in any case, providing all relevant planning considerations both national and local are taken into account.

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

This is a matter for the LPA.

#### **Housing Distribution and Development**

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

The Council's Growth Strategy directs the majority of housing growth to land within or on the periphery of urban areas, towards areas that benefit from, or already have the capacity to deliver good infrastructure, transport, services, facilities, regeneration opportunities and connecting more widely with the opportunities afforded by the Cardiff and Swansea City Regions. As per the Councils analysis (Settlement Assessment revised 2021) on the role of function settlements (reflected in the settlement hierarchy in Policy SF1 and Table 6 and 7) the majority of development is proposed in the higher tier more sustainable settlements. Around 88% of housing and 90% of employment is proposed to be located in settlement/growth area/tiers 1 and 2, with 42% of housing and 70% of the employment located in the primary settlement of Bridgend.

The Welsh Government has no fundamental concerns in respect of the spatial distribution of housing 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 spatial distribution of windfall development has been distributed in line with with the Urban Capacity Study evidence. This is explained in SD37 para 5.7 – 5.9 and Table 5). The WG has no concerns with this approach.

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

This is for the LPA to answer.

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

This is for the LPA to answer.

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

The Council will need to ensure that the proposed policy provides an effective basis for determining applications for HMOs in line with the evidence and relevant legislation. In order for a policy of this nature to be effective and implementable in practice ‘over concentration’ should be defined in the policy. It will be for the LPA to justify its approach based on evidence and ensure it will deliver on the aims of the policy and can be implemented in practice.

**Provision of Outdoor Space and Accessible Greenspace**

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

This is for the authority to respond.

The Welsh Government notes that Policy COM10 adopts the Fields in Trust (FIT) benchmark standards. The policy also considers how new development relates to existing outdoor recreation through the requirement for new on-site provision or a contribution to off-site facilities. We have no significant concerns in this respect.

**9. Does Policy COM11 provide an effective mechanism for the provision of natural and semi-natural green spaces? 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 should include reference to promoting the provision of natural and semi-natural greenspace through enabling development.

PPW (Edition 11) is clear that enabling development can deliver substantial heritage benefits to historic assets listed in paragraph 6.1.2. These assets may contain natural and semi-natural green space, which the authority is seeking to make provision for in Policy COM11.

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