

WELSH GOVERNMENT
Examination Hearing
Statement

Bridgend County Council
Local Development Plan

Matter 3
Affordable Housing and Gypsy, Travellers and
Show People

2 March 2023

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 sufficient to inform the Plan's affordable housing strategy?

PPW (4.2.6) states the importance of the LHMA in LDP preparation when setting housing requirements. The DPM sections 5.14, 5.18 and 5.19 sets out the importance of the LHMA in influencing the spatial distribution of housing in an LDP. The DPM sections 5.31-5.32 (including Table 14) sets out key elements of the LHMA in relation to LDPs, and how this should be used with other elements of the evidence base, particularly affordable housing viability work used to set the percentage targets sought over the plan area. The DPM table 24 sets out the importance of the LHMA tenure mix in viability evidence being consistent with what will be required and what will be sought through the planning application process (in general/broad terms).

The Composite Plan (SD27) para 5.3.20 explains how the LHMA has informed the spatial strategy in that it has been devised to maximise affordable housing delivery in areas of highest need. The Welsh Government does not object to this approach.

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

We note that the plan (SD27) para 5.3.11 explains that the total need for affordable housing over the plan period is 5,134 affordable homes, comprising 2,839 social rent and 2,295 intermediate housing.

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

This is for the LPA answer.

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

This is for the LPA to answer. We note that the affordable housing target is now 1,595 homes to reflect recent changes/updates and this has been reflected throughout the Composite Plan (SD27). We note that the degree of which the Council has sought to meet the need and its approach is summarised in paras 5.3.20 – 5.2.23.

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

PPW 5.2.19 states the requirement for a plan wide viability appraisal to support LDPs. The DPM sets out detailed viability guidance 5.86 – 5.108 regarding how to prepare a high-level and site specific viability study and how this work should be translated to the affordable housing policies/targets in the plan. The DPM states that the key viability inputs and assumptions should be based on a consensus with key partners through a Viability Stakeholder Group, supported by SoCGs where necessary/applicable.

The Council has undertaken a considerable amount of work in respect of viability and delivery, in particular (not exhaustive):

- SD81 – Plan-Wide Viability Assessment (2021)
- SD82/SD83 – Strategic sites Independent Financial Viability Appraisal Report and Addendum (2021, 2022)
- SD77 - Infrastructure Delivery Plan (2022)
- SD241 – Statement of Common Ground – Strategic Sites

The Council have complied with the DPM in what evidence is required and we have no fundamental concerns in this respect. The actual values attributed to the specific modelling assumptions such as build costs, and developer profit are more appropriate for the industry to comment on, not Welsh Government.

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?

This is for the LPA to answer.

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

This is for the LPA to answer.

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

PPW (4.2.5 and 4.2.28) states that LDPs must clearly express the level of market and affordable homes to be delivered over the plan period. DPM (Affordable Housing Policy Framework Checklist, page 149) summarises what is required in presentational terms within the plan to ensure the plan is clear and consistent in relation to the affordable housing target, policies, and the reasoned justification(s). The Welsh Government considers that the suit of policies and supporting text and tables as part of SP1, SP6, COM1, COM2, COM3 and Table 8 ensure the plan is clear in terms of the overall target, the amount of affordable housing to be delivered on specific sites, market areas, and the components of supply.

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

This is for the LPA to answer.

c) How will the affordable housing target be delivered?

This is for the LPA answer. See our answer to 3a regarding presentational requirements.

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

This is for the LPA to answer.

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

This is for the LPA to answer.

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?

This is for the LPA to answer.

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

This is for the LPA to answer.

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

Paragraph 4.2.34 of PPW states that “it should be made clear that the release of housing sites **within or adjoining existing settlements** for the provision of affordable housing to meet local need which would not otherwise be allocated in the development plan, is an exception to the policies for general housing provision”. This is reinforced in TAN 2 para 10.14. The proposed amendments within the Composite Plan (SD27) to include reference to ‘within and adjoining’ settlements in COM 5 addressed our Deposit objection in this respect. We also support the addition of the inclusion of a definition of ‘local need’ in para 5.3.35 which addresses our Deposit concerns in this respect in relation to TAN 2 requirements (10.16 and 10.17).

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

PPW does not preclude an LPA setting a threshold for exception sites. The only point we would make is in relation to higher order more sustainable settlements with high levels of need set out in the LHMA. Could a higher threshold be more appropriate in some cases to maximise the delivery of 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?

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

We note the Councils has responded to your questions in the Response to the Preliminary questions (ED3) where the Council state that the 'remaining need' over the plan period is 3 pitches (Travelling Show People) which will be met by an allocation at Coachman's Lane in policy SP7. We note that these updates/changes have been reflected in the Composite Plan (SD27).

We understand that the relevant WG Department has not yet 'signed off' the Bridgend, or indeed other GTAA updates submitted across Wales. On this basis the WG (Planning Directorate) considers the only pragmatic way forward is to use the latest draft and any updates provided by the LPA as the latest position and move forward on that basis.

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?

This is for the LPA to answer. The DPM, Table 23, page 136 explains the presentational requirements for the plan to ensure it is clear on the level, type, and timescales for the need identified. Table 9 of the Composite Plan (SD27) aligns with the DPM in this respect.

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?

The WG has no concerns with the policy wording. The Circular promotes a sequential approach to development in line with sustainable development principles. This does not preclude development in the countryside, but only if there is a lack of suitable locations within or adjacent to existing settlement boundaries (WG Circular, paras 38 and 39). The policy wording aligns with national policy on this basis.

However, para 5.3.49 is unclear in its intent. Annex B in the Circular notes that a policy requirement to demonstrate 'unmet need in the GTAA' would act against the freedom of movement for Gypsy and Travellers who may wish to develop their own sites. Such restrictions should not be placed on Gypsy and Travellers. The Circular (005/2018) is clear that criteria based policies must be fair, reasonable, realistic and effective in delivering sites and must not rule out or place undue constraints on the development of sites (para 49). It is unclear whether the reasoned justification is in the spirit of this approach and could be clearer.

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?

We note that this allocation is proposed to be deleted as it is no longer necessary. (SD27 – Policy 7). We note that BP 18 explains the site details and intentions.

a) What is the current use of the allocated?

No comment.

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

No comment.

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

No comment.

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

No comment.

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

No comment.

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