

**BRIDGEND**  
**REPLACEMENT LOCAL DEVELOPMENT PLAN (2018-2033)**  
**EXAMINATION**

**Hearing Session 3 - Affordable Housing and Gypsy, Travellers, and Show People**

<b>Action Point</b>	<b>Council response / proposed MAC</b>	<b>Inspector's Response</b>
<p><b>AP 3.1</b> - Council to amend the affordable housing target in Policy SP6 and associated text from 1,977 to 1,595.</p>	<p>Policy SP6 will be amended as below:</p> <p><b><u>SP6: Sustainable Housing Strategy</u></b></p> <p>The plan makes provision for 8,335 homes to promote the creation and enhancement of sustainable communities and meet the housing requirement of 7,575 homes for the Plan period, of which, <del>1,977</del> 1,595 of these homes will be affordable.</p> <p>Development will be distributed in accordance with Strategic Policy SP1, based on the Sustainable Housing Strategy that will:</p> <ol style="list-style-type: none"> <li>1) Prioritise the re-use of previously developed (Brownfield) land;</li> <li>2) Enable delivery of Strategic Sites, including Regeneration Sites within existing settlement boundaries and Sustainable Urban Extensions (SUEs) on the edge of established settlements;</li> <li>3) Enable Edge of Settlement Sites within, and on the edge of, established settlements;</li> </ol>	<p>Change agreed, subject to confirmation of housing / affordable housing numbers.</p>

	<p>4) Support windfall residential development at appropriate sites within the settlement, focussing on the re-use of previously developed land;</p> <p>5) Enable exception sites within or adjoining settlement boundaries to deliver affordable housing and homes that provide for an identified local need; and</p> <p>6) Support use of Place Plans to identify small, local development sites that reflect local distinctiveness and address local, specific community scale issues and promote self and custom build opportunities.</p> <p>There will be a presumption against housing development in all areas outside defined settlement boundaries, unless the proposal is considered an appropriate exceptional case as detailed in Development Management Policy COM5.</p> <p>Delivery of the housing requirement is fundamental to effectiveness of the LDP and will be monitored on an annual basis through the Annual Monitoring Report.</p> <p>Supporting paragraph 5.3.10 will be amended as follows:</p> <p>The delivery of affordable housing is an integral part of the LDP’s overall housing requirement, which incorporates <del>1,977</del> 1,595 affordable housing units</p>	
<p><b>AP 3.2</b> – Council to amend Policy COM 5 and associated text to include reference to the development of affordable housing ‘within or adjoining’ settlement boundaries.</p>	<p>Policy COM5 will be amended as below;</p> <p>Proposals to develop affordable housing on sites <del>outside</del> within or adjoining settlement boundaries will only be permitted where:</p> <ol style="list-style-type: none"> <li>1) The proposal meets an identified local need that cannot be satisfied on alternative sites within the locality’s identified settlement boundary;</li> </ol>	<p>Changes agreed.</p>

- 2) The proposal represents a logical extension to the existing settlement, does not exceed ten affordable dwellings and is of a scale appropriate to and in keeping with the character of the settlement;
- 3) The site is in a sustainable location, within or adjoining ~~adjacent to~~ an existing settlement boundary with reasonable access to at least a basic range of local community services and facilities;
- 4) The proposed dwelling(s) are of a size, tenure and design which is commensurate with the affordable housing need identified for the locality;
- 5) There are secure mechanisms in place to ensure the dwellings are accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers; and
- 6) There is no loss of land of important recreational, amenity or natural heritage value.

The Council may consider proposals within or adjoining Tier 1 and Tier 2 Settlements that exceed criterion 2's ten dwelling threshold where the applicant can demonstrate:

- a) There are no existing concentrations of affordable housing within the site's vicinity, which would be further compounded by the proposal;
- b) The design, scale, layout and siting of the affordable homes will positively integrate with nearby existing communities to ensure the development will not result in a noticeable, isolated concentration of affordable housing; and

- c) The proposal contains a sustainable mix of house types, sizes and tenures to allow for a balanced community, while responding to housing need identified within the LHMA or by the Local Housing Authority.

All exception sites must provide enhanced active travel links to connect to the Active Travel Network and/or nearest commercial centre as appropriate.

Market housing will not be permitted on 100% affordable housing exception sites. The proposed affordable housing must meet the needs of local people in perpetuity, which will be secured through the planning consent by means of a S106 legal agreement.

Supporting paragraph 5.3.34 will be amended as below:

5.3.34 COM5 will facilitate delivery of small affordable housing schemes within or adjoining existing settlements where it can be clearly demonstrated that there is a pressing local need and this need cannot otherwise be accommodated within the respective settlement boundary. Affordable Housing Exception Sites must typically comprise of no more than 10 units, which is the appropriate size for a sustainable cluster of affordable housing. Sites larger than 10 units can become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities ~~and will therefore not be in accordance with COM5~~. However, it is recognised that the Tier 1 and Tier 2 Settlements are the most sustainable in the settlement hierarchy. Proposals for more than 10 affordable units may be acceptable within or adjoining Tier 1 and Tier 2 Settlements where applicants clearly justify the need to depart from a ten-unit cluster in the context of the wider environ and in response to acute local housing need identified by the LHMA and/or Local Housing Authority. In order to demonstrate these points, the

planning application must be accompanied by a robust affordable housing statement. This must specify the reasons why the proposal deviates from the clustering threshold specified within COM5(2) and demonstrate how the development would not further compound or result in noticeable concentrations of affordable housing within a particular locality. The statement must also describe how a larger exception site would integrate with nearby existing communities in a manner that prevents stigmatisation and non-inclusivity by virtue of its design, layout, scale and siting. The statement must also detail how the mix of affordable tenures, types and sizes respond to the LHMA while maximising opportunities for different household structures to reside cohesively. Clusters of more than ten units will need to be carefully designed and balanced to help prevent atypically high child densities, over concentration of similar household types and undue clustering of households with high support needs in a small geographical radius. Enhanced connections to the Active Travel Network and/or nearest commercial centre must be provided to promote sustainable forms of travel and minimise reliance on the private car.

**Paragraph 4.3.62 will be amended as set out below:**

Affordable Housing Exception Sites will typically comprise of no more than 10 units, which is the appropriate size for a sustainable cluster of affordable units. Larger sites can become increasingly uncondusive to the delivery and maintenance of a balanced, mixed tenure community and will therefore not meet the definition of this site typology. The Replacement LDP seeks to deliver the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. COM5 does not seek to promote significant levels of affordable housing development outside of settlement

	<p>boundaries to contribute to this target, rather provide a mechanism to meet specific, pressing, yet limited housing need. Affordable Housing Exception sites will be small in scale and exceptional in circumstance.</p> <p><b>Paragraph 5.3.23 will also be amended as set out below:</b></p> <p>The remaining need for affordable housing (identified in the LHMA) will need to be delivered through a range of other mechanisms. These mechanisms include capital grant funding (Social Housing Grant or otherwise), self-funded Registered Social Landlord developments, private sector leasing schemes, re-utilisation of empty homes and re-configuration of existing stock. However, these mechanisms are outside the scope of the 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 life of the LDP. On this basis, no further allowance has been made in Table 8 to factor in such alternative affordable housing delivery mechanisms. Equally, whilst there is a framework to enable affordable housing exception sites, these developments are intended to be small in scale, exceptional in circumstance and only to meet an identified, pressing, local need. The LDP's affordable housing target does not factor in an allowance for affordable housing delivered on exception sites for this reason.</p>	
<p><b>AP 3.3</b> – Council to review Policy COM 5 (2) and, in light of the settlement hierarchy, consider if an alternative approach which</p>	<p>The Plan seeks to prioritise delivery of affordable housing within the designated settlement boundaries in accordance with placemaking principles.</p> <p>COM5 is intended to act as a 'pressure valve' to meet very pressing housing need that is both small in scale and exceptional in circumstance and clearly cannot be accommodated within settlement boundaries. It is not intended to be a mechanism to deliver significant quantities of affordable housing within inappropriate or</p>	<p>Change agreed. It is noted that proposed changes to the policy wording and supporting text are now detailed in AP3.2.</p>

provides greater flexibility to deliver affordable housing on exception sites might be appropriate.

unsustainable countryside locations and repeat the large, mono-tenure mistakes of the past.

This 10 unit cluster approach has been devised following routine discussions with RSL housing managers as to the appropriate size for a sustainable cluster of affordable homes. The optimal size of a cluster is 6-8 affordable dwellings and 10 dwellings is therefore considered to represent the upper limit of sustainability in this respect. This principle follows best practice to disperse affordable housing across larger multi-tenure housing developments and is therefore equally, if not more applicable to an exception site.

Affordable housing clusters of more than 10 units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities. RSL housing managers have habitually reported that smaller clusters aid effective housing management, especially when those clusters contain a mix of affordable tenures and house types. Larger concentrations of affordable housing that are poorly distributed can lead to higher groupings of more vulnerable households and often higher child densities which can, in some instances, act as a catalyst for anti-social behaviour. Resultant developments of more than 10 dwellings are therefore less likely to remain mixed and balanced. This could be detrimental to existing and future residents' amenity. Larger concentrations of affordable housing will also become particularly noticeable within or adjoining an established settlement, which is more likely to result in stigmatised, non-inclusive communities in the long term.

It is fully recognised that certain settlements are more sustainable as identified in the Settlement Hierarchy. The Spatial Strategy has apportioned the majority of growth to the Primary Key Settlement of Bridgend and Main Settlements of Porthcawl, Pencoed, Maesteg and Pyle, Kenfig Hill and North Cornelly. The locational housing need identified in the LHMA informed the selection of the most appropriate spatial strategy from the outset of plan preparation and ensured sustainable growth is channelled to these vicinities to maximise affordable housing

delivery in such high need areas. This has ensured that the new proposed housing allocations are geographically balanced with community facilities, services and employment opportunities within existing settlements to promote sustainable patterns of movement. While greater flexibility could be considered on exception sites within the Primary Key Settlement and Main Settlements, there is a significant risk of creating tenure monocultures within or adjoining established settlements. This is likely to be to the detriment of sustainable placemaking and is not supported by the Council. The most effective means of combatting these issues is to ensure clusters of affordable housing comprise no more than 10 affordable dwellings on exception sites.

It is therefore not considered appropriate to enable larger clusters on exception sites, even in more sustainable settlements. Greater accessibility to services, facilities and employment opportunities is certainly fundamental in achieving placemaking led outcomes. However, notwithstanding the sustainability credentials of any settlement in question, undue concentrations of more than ten affordable homes are still more likely to result in unbalanced, stigmatised, non-inclusive communities in the long-term. This is the fundamental rationale for maintaining a policy requirement for clusters of no more than ten affordable homes. This approach will also provide certainty when exercising the development management function.

The Council's view is considered clear in this respect and it is considered that the ten unit restriction should be maintained.

However, if the Inspector is mindful to incorporate greater flexibility into the policy, the Council would request that this is limited to settlements within Tier 1 and Tier 2 of the settlement hierarchy and applied through a series of appropriate criteria. It is felt that applicants would need to demonstrate that existing affordable homes are proportionately distributed across the immediate vicinity and the development would not further exacerbate or result in noticeable concentrations of affordable housing within a particular area that would be to the detriment of a mixed and

	<p>balanced community. The onus should also be placed on the developer to demonstrate how the design, layout and management of the homes would justify departing from a ten-unit cluster in response to specifically identified local housing need and in the context of the wider environ. This would be considered to be of paramount importance to demonstrate how a larger exception site would integrate with nearby existing communities in a manner that prevents stigmatisation and non-inclusivity.</p>																					
<p><b>AP 3.4</b> – Mr John of GJP to provide examples of affordable housing exceptions policies.</p>	<p>N/A</p>	<p>Examples noted.</p>																				
<p><b>AP 3.5</b> – Council to amend Table 9: Gypsy and Travellers Need over the Plan Period to reflect the revised need.</p>	<p>Table 9 will be amended as below:</p> <table border="1" data-bbox="450 804 1285 1394"> <thead> <tr> <th data-bbox="450 804 633 959">Type / Location of Need</th> <th data-bbox="633 804 808 959">2020-2025</th> <th data-bbox="808 804 943 959">2025-2033</th> <th data-bbox="943 804 1070 959">Total Need LDP Plan Period</th> <th data-bbox="1070 804 1285 959">Allocation Required in LDP?</th> </tr> </thead> <tbody> <tr> <td data-bbox="450 959 633 1177">Residential (Pencoed)</td> <td data-bbox="633 959 808 1177">0 pitches</td> <td data-bbox="808 959 943 1177">1 pitch</td> <td data-bbox="943 959 1070 1177">1 pitch</td> <td data-bbox="1070 959 1285 1177">No – relocated to an existing authorised private site and no longer requires assistance.</td> </tr> <tr> <td data-bbox="450 1177 633 1302">Residential (Pen-Y-Fai)</td> <td data-bbox="633 1177 808 1302">3 pitches</td> <td data-bbox="808 1177 943 1302">0 pitches</td> <td data-bbox="943 1177 1070 1302">3 pitches</td> <td data-bbox="1070 1177 1285 1302">Yes – Land is allocated via SP7(1) for 3 pitches</td> </tr> <tr> <td data-bbox="450 1302 633 1394">Residential (Coytrahen)</td> <td data-bbox="633 1302 808 1394">2 pitches</td> <td data-bbox="808 1302 943 1394">1 pitches pitch</td> <td data-bbox="943 1302 1070 1394">3 pitches</td> <td data-bbox="1070 1302 1285 1394"><del>Yes – Land is allocated via SP7(2) for 3</del></td> </tr> </tbody> </table>	Type / Location of Need	2020-2025	2025-2033	Total Need LDP Plan Period	Allocation Required in LDP?	Residential (Pencoed)	0 pitches	1 pitch	1 pitch	No – relocated to an existing authorised private site and no longer requires assistance.	Residential (Pen-Y-Fai)	3 pitches	0 pitches	3 pitches	Yes – Land is allocated via SP7(1) for 3 pitches	Residential (Coytrahen)	2 pitches	1 pitches pitch	3 pitches	<del>Yes – Land is allocated via SP7(2) for 3</del>	<p>Changes agreed.</p>
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					<p>Pitches. No - consent has been granted to intensify an existing authorised private site and accommodate the 3 pitches.</p>		
	<p><b>Total Pitches LDP Plan Period</b></p>	<p><b>5 pitches immediate need</b></p>	<p><b>2 pitches (2025-2033)</b></p>	<p><b>7 pitches</b></p>			
	<p>Supporting paragraph 5.3.47 will be amended as below:</p> <p>Based on this evidence of need, the Council has made site specific provision for <del>two</del> <del>one</del> permanent three pitch sites (SP7), which <del>are</del> <del>is</del> intended for private development. The identified sites <del>have</del> <del>has</del> been selected based on the guidance contained in Circular 005/2018 as detailed within the Gypsy and Traveller Site Options Background Paper. The site allocations <del>have</del> <del>has</del> also been informed by and <del>have</del> been subject to close consultation with the respective members of the Gypsy, Traveller and <del>Showperson</del> <del>Showpeople</del> community.</p>						
<p><b>AP 3.6</b> – Council to delete Policy SP7 (2) Land adjacent to Bryncethin Depot.</p>	<p>Policy SP7 (2) will be amended as below:</p> <p><b><u>SP7: Gypsy, Traveller and Showpeople Sites</u></b> Gypsy, Traveller and Showperson Sites are allocated in the following locations, as shown on the Proposals Map, to meet the identified needs of the community over the LDP period as detailed in the GTAA:</p> <p>SP7 (1) Land off Old Coachman’s Lane (permanent, 3 pitch site)</p> <p><del>SP7 (2) Land adjacent to Bryncethin Depot (permanent, 3 pitch site)</del></p>						<p>Changes agreed.</p>

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General note on Action Points (APs):

These will normally be agreed in principal by the Inspector and the Council, and any other participant as required, at the end of the relevant hearing session. Where possible the AP will specify an agreed timeframe for completion. If it is not possible to determine the timeframe at the time of discussion, the Council will liaise with the Inspector over this via the Programme Officer. The Inspector will send the suggested form of wording for the APs to the Council via the Programme Officer as soon as practicable after the end of a hearing session. Once the Council is satisfied that the contents are accurate, they will be published to the Examination website as soon as possible in the interests of transparency. The Council will work on the schedule of Matters Arising Changes (MACs) in parallel with the APs and their AP responses, ensuring that MACs are accurately recorded at the earliest possible stage. The Inspector will confirm when she expects to be sent an up to date MAC Schedule; this will normally be in advance of the final hearing session.