

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

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**INSPECTOR'S NOTE – HOUSING SUPPLY**

1. The purpose of this note is to outline my preliminary findings in respect of the housing supply (HS) contained in the emerging Bridgend Replacement Local Development Plan (RLDP) and to seek the Council's view on the approach to be taken to ameliorate the issue identified.

*National Policy*

2. The Development Plans Manual (DPM) recognises that it will be extremely rare for all sites identified in a plan to come forward in the timescale anticipated and that there may be instances where site specific circumstances, unknown at the plan making stage, delay the delivery of sites. To address these circumstances, the DPM requires that a flexibility allowance is identified and embedded into the plan. The Manual suggests that the starting point for the allowance could be 10% with any variation robustly evidenced and that the level of flexibility chosen when the plan goes on deposit is broadly maintained upon adoption of the plan.

*Background*

3. The Deposit Draft Bridgend RLDP through Policy SP6 outlines a requirement for 7,575 new dwellings to be constructed in Bridgend over the plan period. In order to meet the housing requirement, the RLDP makes provision for a HS of 9,207 dwellings. The HS includes a 20% flexibility allowance which equates to 1,632 dwellings. The HS includes a 20% flexibility allowance which equates to 1,632 dwellings which was included to ensure the Plan will remain effective in the event of changing circumstances such as non-delivery of key sites and/or other unforeseen issues and 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<sup>1</sup>.
4. During the Examination, it became clear that Land at Parc Afon Ewenni (Policy COM1(1)), which is allocated in the Deposit Draft RLDP for 685 dwellings, is subject to significant flood constraint. As a consequence, the Council has proposed the deletion of this site in the Schedule of Minor Changes and their Statement for Hearing Session 9.
5. Based on the evidence presented and requirements of national policy in relation to flood risk, I agree that the allocated site is constrained and should be deleted.
6. The deletion of the Land at Parc Afon Ewenni would reduce the HS to 8,335 dwellings and, in doing so lower the flexibility allowance to 10% (760 dwellings). When adjusted to take account of the 2022/23 housing completions data and amended housing allocations<sup>2</sup> the agreed HS is 8,423, which includes an 11% flexibility allowance (848 dwellings).
7. Attached at Appendix 1 is the Draft BRLDP HS and Anticipated Annual Build Rate (AABR) for the plan period.

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<sup>1</sup> SD1 - Deposit Draft Bridgend RLDP, paragraph 5.3.8

<sup>2</sup> Action Points 2.5, 8.2, 9.1, 9.3, 10.1, 11.1 and 12.1

8. Appendix 1 illustrates that the HS is made up of a combination of landbank and windfall sites, which provides approximately 40% of the supply (3,771 dwellings) and allocated sites, which accounts for 60% of the provision (4,652 dwellings).
9. Of the 4,652 dwellings to be delivered on allocated sites, 4,172 or approximately 89% would be built on five strategic development sites (SDS) with the remaining 480 dwellings to be constructed on three non-strategic sites.
10. Evidence presented by the Council indicates that:
  - Non-strategic sites would be developed between 2024 and 2029;
  - SDS would be built at a rate of between 100 and 150 dwellings per annum between 2025 and 2033, resulting in a combined contribution of 716 dwellings per annum for the period 2027/33; and
  - Subject to the number of phases, the SDS would be built at a rate of 50 to 60 dwellings per annum.
11. Delivery rates for the SDS have been defined by the Council in consultation with the site promoters and the Housing Trajectory Stakeholder Group.
12. Representors objecting to the RLDP raised a number of concerns in respect of the HS. These included: the potential for non-delivery of committed sites and small / large windfall sites; delays in the delivery of SDS caused by matters such as the marketing and sale of the sites, fluctuations in the housing market which may reduce build rates, the planning process and the provision of required highway improvements and infrastructure; and the possible reduction in the number of dwellings to be built on sites because of ecological or environmental constraints.
13. To provide clarity about the potential impact of a delay in delivering the SDS on the HS and AABR, the Council produced a brief note<sup>3</sup> outlining the findings of the modelling work that informed the proposed reduction of the flexibility allowance and the options, other than new housing allocations, available / considered to maintain the flexibility allowance at / close to 20%.
14. The note explains that the Council looked at a range of scenarios including the reduction in the numbers of dwellings to be constructed on two of the SDS, a delay in development commencing on one SDS and a delay in development commencing on all five SDS. The findings of this exercise indicated that the scenarios would result in a loss of between 360 and 610 dwellings and reduce the flexibility allowance for the remainder of the plan period to between 2 and 5%.
15. In addition, to assess potential capacity the Council reviewed committed sites that were previously discounted, density levels on allocated sites and considered the potential to bring forward brownfield regeneration allocations. The findings of the review indicate that the Council's original assessment of these options was robust, and these areas were unlikely to assist in maintaining the flexibility allowance at 20%. The exception to this is the Former Cooper Standard Site, Ewenny Road, Maesteg (Policy COM1(R2)) which, because of changing circumstances, could be developed for housing during the plan period but has not been included in the HS.
16. Overall, the note concluded that given the robustness of the supporting evidence base a 10% flexibility allowance would be sufficient to ensure deliverability of the AABR over the plan period.

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<sup>3</sup> AP2.6

## *Considerations*

17. On the basis of the evidence presented in respect of landbank and windfall sites, which includes data in relation to urban capacity, settlement boundaries and the review of committed sites, I am satisfied that that these elements are capable of contributing 3,771 new dwellings to the HS over the plan period.
18. Equally, I am content that the evidence presented in respect of each of the allocated housing sites, including that relating to placemaking, masterplanning, transportation, utilities, ecology and renewable energy, support the inclusion of a figure of 4,652 in the HS and that the houses could, potentially, be delivered at the rate outlined in the latest version of the Housing Trajectory.
19. However, predicting the delivery rate of new housing is not an exact science and, for reasons such as those outlined by representors, the sites may be subject to delay resulting in a shortfall in provision over the plan period. To my mind the risk of such a delay is compounded by the make-up of the HS which places significant reliance on the delivery of the five SDS. Although I am satisfied that the SDS may come forward over the plan period, the development of largescale sites over a number of years is complex and can often result in variations in the schemes and/or protracted construction periods.
20. To safeguard against any potential delay in the delivery of sites the Council is proposing the inclusion of a 10% flexibility allowance in the HS. This level of flexibility has been demonstrated to, theoretically, be sufficient to meet delays in the early stages of SDS delivery. I am mindful however, that should the flexibility allowance be required to address a reduction in the scale of development or further delay in the delivery of a SDS in the early / middle of the plan period then only a limited amount of additional capacity would remain in the HS to address any other shortfall that may occur in provision up to 2033.
21. For this reason, I am of the view that the flexibility allowance should be extended to around 15% (1,136 dwellings). This level of increase would ensure that additional capacity of between 7 and 10% is available to address any site specific or unknown circumstances and ensure the delivery of housing throughout the plan period.

## *Way Forward*

22. In order to address the required additional capacity, the Council is requested to identify site(s) capable of delivering the additional flexibility 4% over the plan period. In doing so, consideration should be given to the potential for including the Former Cooper Standard Site, Ewenny Road, Maesteg, currently identified under Policy COM1(R2), in the HS.
23. The Council should submit this further information as soon as it is available, and no later than 22 May 2023.
24. If you have any questions about the content of this note, please contact me via the Programme Officer.

*Nicola Gulley*

INSPECTOR

<b>Draft BRLDP Housing Supply and Anticipated Annual Build Rate for 2018/33</b>																
<b>Component of HLS</b>	<b>18/19</b>	<b>19/20</b>	<b>20/21</b>	<b>21/22</b>	<b>22/23</b>	<b>23/24</b>	<b>24/25</b>	<b>25/26</b>	<b>26/27</b>	<b>27/28</b>	<b>28/29</b>	<b>29/30</b>	<b>30/31</b>	<b>31/32</b>	<b>32/33</b>	<b>Total</b>
<b>Landbank and Windfall</b>																
Actual Completions on large sites	521	423	296	195	298											<b>1733</b>
Actual Completions on small sites	58	54	50	53	50											<b>265</b>
Anticipated Completions on large sites with planning permission						408	128	60	60	60	60	25				<b>801</b>
Windfall (large)							44	44	44	44	44	44	44	44	44	<b>352</b>
Windfall (small)						62	62	62	62	62	62	62	62	62	62	<b>620</b>
<b>Allocated Sites</b>																
PLA1									60	120	120	120	120	120	120	<b>780</b>
PLA2									68	120	120	120	120	120	120	<b>788</b>
PLA3							30	100	100	100	100	100	100	100	100	<b>830</b>
PLA4									84	120	120	120	120	120	120	<b>804</b>
PLA5									70	150	150	150	150	150	150	<b>970</b>
COM1(1)								10	50	48						<b>108</b>
COM1(2)							10	25	40	40	25					<b>140</b>
COM1(3)								15	25	25	37					<b>102</b>
COM1(4)							10	45	45	30						<b>130</b>
<b>Total pa</b>	<b>579</b>	<b>477</b>	<b>346</b>	<b>248</b>	<b>348</b>	<b>470</b>	<b>240</b>	<b>361</b>	<b>708</b>	<b>919</b>	<b>838</b>	<b>741</b>	<b>716</b>	<b>716</b>	<b>716</b>	<b>= 8423*</b>

\*8423 = HR plus Flexibility Allowance of 11% (848 dwellings)