



Bridgend Replacement Local Development Plan 2018-2033



Background Paper 5: Affordable Housing

Table of Contents

1.	Purpose of the Report.....	1
2.	Introduction.....	1
3.	Summary of Findings, LHMA 2021.....	3
4.	Viability and Deliverability Evidence.....	5
5.	Replacement LDP Policy Implications.....	10
6.	Conclusion.....	14

Appendix 1: Detailed LHMA Housing Need Tables

Appendix 2: Existing Land Bank (Sites with Planning Permission) with
Affordable Housing Provision

BRIDGEND REPLACEMENT LOCAL DEVELOPMENT PLAN (LDP) 2018-2033

BACKGROUND PAPER 5: AFFORDABLE HOUSING

1. Purpose of the Report

- 1.1 The purpose of this Paper is to detail how affordable housing need, viability and deliverability evidence has been taken into account in planning for realistic levels of market and affordable housing within the Replacement LDP. The Paper documents how different market areas can affect the viability of delivering private and affordable housing as well as associated infrastructure to support the level of development proposed. This has ensured formulation of realistic affordable housing targets and policies. The Paper also explains how the Replacement LDP's affordable housing policies have been developed to include both area-based and site-specific targets and thresholds. This Paper has been prepared in conjunction with the Local Housing Market Assessment (2021), Strategic Growth Options Background Paper, Spatial Strategy Options Background Paper, Plan-Wide Viability Assessment (2021) and site-specific viability appraisals.

2. Introduction

- 2.1 The Replacement LDP has a key role in ensuring new housing development incorporates a mix of market and affordable housing, thereby contributing to the development of sustainable, cohesive communities. This includes incorporation of a range of tenures and property sizes, to cater for the plethora of housing needs identified across the County Borough. As outlined Edition 11 of Planning Policy Wales (PPW),

Planning authorities must understand all aspects of the housing market in their areas, which will include the requirement, supply and delivery of housing. This will allow planning authorities to develop evidence-based market and affordable housing policies in their development plans and make informed development management decisions that focus on the creation and enhancement of Sustainable Places (WG, 2021, para 4.2).

- 2.2 The Local Housing Market Assessment (LHMA) is a core piece of evidence in this respect as it identifies the level and type of housing need per annum, both numerically and spatially. The requirement for Local Authorities to consider the housing accommodation needs of their localities is specified within Section 8 of the Housing Act 1985. The importance of LHMA's was also recently re-emphasised in the 2019 Independent Review of Affordable Housing Supply. PPW further clarifies that LHMA's are to "form a fundamental part of the evidence base for development plans", which should be considered

holistically with a range of other evidence “in order to identify an appropriate strategy for the delivery of housing in the plan area” (WG, 2021, para 4.2.6).

- 2.3 A refreshed LHMA for Bridgend County Borough was therefore completed in 2021 in accordance with Welsh Government Guidance (2006 and 2014). The 2021 LHMA provides an overview of key tenure related statistics, detailing socio-economic and demographic trends, before assessing the quantitative level of housing need across each Housing Market Area (HMA). In accordance with Edition 3 of the Development Plans Manual (2020), the LHMA has identified the total affordable housing need extrapolated over the plan period, the spatial implications and the predominant tenure mix required. The total need for affordable housing over the Replacement LDP period (2018-2033) is 5,134 affordable housing units, comprising 2,839 social rented dwellings and 2,295 intermediate dwellings (rounded).
- 2.4 The scale of affordable housing need and spatial distribution thereof have been key considerations when determining the overall level and location of housing in the Replacement LDP (refer to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). However, the Plan’s contribution to affordable housing provision has also been carefully analysed through robust viability work (plan-wide and site-specific) to ensure formulation of viable affordable housing policy thresholds and proportions. It also has to be recognised that the need identified in the LHMA represents the scale of the affordability gap in the market and the LDP itself is not the only affordable housing delivery mechanism to help address it.
- 2.5 The overall affordable housing target specified within the Replacement LDP has been determined by taking these inter-related components of evidence into account. This has informed development of a robust housing trajectory to illustrate the rate of housing delivery for both market and affordable housing for the plan period (refer to the Housing Trajectory Background Paper). This Paper clarifies how the HMAs identified in the LHMA have been spatially reflected in viability testing, thus ensuring clarity for policy formulation, spatial expression and application to enable realistic affordable housing policy targets in the Replacement LDP.
- 2.6 Affordable housing, for the purposes of the land use planning system, is housing where there are secure mechanisms in place to ensure that it is accessible to those who cannot afford market housing, both on first occupation and for subsequent occupiers. Affordable housing includes; social rented housing owned by local authorities and Registered Social Landlords, and intermediate housing where prices or rents are above those of social rent but below market housing prices or rents. All other types of housing are referred to as ‘market housing’, that is private housing for sale or rent where the price is set in the open market and occupation is not subject

to control by the local authority. It is recognised that some schemes may provide for staircasing to full ownership and where this is the case there must be secure arrangements in place to ensure the recycling of capital receipts to provide replacement affordable housing.

3. Summary of Findings, LHMA 2021

3.1 The LHMA identified eight broad Housing Market Areas across the County Borough. These areas are based on functional geographies, considering the potential sphere of relocation, the broad cost of housing (to gauge 'transferability' within the market) and the influence of major transport links (to take account of commuting patterns). The LHMA acknowledged that individual preferences of households may well centre on smaller geographical radii. However, planning for additional housing provision needs to be conducted at a scale suitable to consider the costs and benefits of increasing supply (i.e. land availability, broad viability, dwelling vacancy rates and potential impact on housing need deficits). For ease of reference, the eight Housing Market Areas are:

- Bridgend and Surrounding
- Garw Valley
- Llynfi Valley
- Ogmore Valley
- Pencoed and Heol Y Cyw
- Porthcawl
- Pyle, Kenfig and Cornelly
- Valleys Gateway

3.2 The LHMA used a range of demographic, socio-economic, and property intelligence data to provide detailed insights into the mechanics of each residential market. Broadly speaking, household sizes were found to be increasingly smaller across all areas and tenures, which is a dual reflection of societal changes in household formation and an ageing local population. This represents a clear mismatch between demographics (i.e. smaller households) and local dwelling stock (i.e. predominantly larger dwellings). Whilst this does enable upscaling for those households than can afford larger properties, it equally presents limited choice and an affordability problem for households on the margins.

3.3 The LHMA also revealed notable differences in housing market characteristics across the County Borough; with demand, property prices and rents being highest in southern Housing Market Areas, most notably 'Bridgend and Surrounding', 'Porthcawl' and 'Pencoed and Heol Y Cyw'. Even though household incomes were identified as being somewhat higher in these vicinities, average house price to income ratios were wider; as much as 7 to 10 times. Affordability is therefore a significant issue in many of the County Borough's southern housing markets. This trend is likely to exacerbate if wage inflation fails to keep pace with escalating property prices and sufficient

affordable housing is not provided. Whilst affordability was identified as a less significant issue in the Valleys housing markets, the LHMA still identified a need to diversify the housing stock in these areas and deliver smaller yet sustainable affordable housing, especially 1 bedroom provision.

- 3.4 Whilst assessing the local housing market as a whole, the LHMA also specifically calculated the need for affordable housing within the County Borough. The Development Plans Manual (Edition 3) requires LHMA's to "identify the total affordable housing need extrapolated over the plan period, spatial implications and the predominant tenure mix required" (para 5.32). Hence, the LHMA identified an annual need for 451 affordable units (rounded) during the conventional five year assessment period, based on the assumption that the existing backlog will be cleared during these five years. A further annual need of 288 affordable units (rounded) has also been identified over the remaining 10 years of the LDP period, stemming from newly arising need from newly forming households plus existing households falling into need. This equates to a total need for 5,134 affordable housing units over the Replacement LDP period (2018-2033), comprising 2,839 social rented dwellings and 2,295 intermediate dwellings. These extrapolated findings have further been simplified in Table 1 below, to illustrate the broad tenure split needed over the Replacement LDP period by HMA. A more detailed tenure and property size split is provided in Appendix 1.
- 3.5 The LHMA evidently revealed significant shortfalls of affordable housing provision within Bridgend, Porthcawl, Pencoed, and Pyle, Kenfig Hill and North Cornelly. Moderate housing need was also identified in Maesteg and the Llynfi Valley, as was the need to diversify the dwelling stock within Valleys Settlements. The scale and location of need identified by the LHMA has influenced the Growth and Spatial Strategy of the Replacement LDP (refer to the Strategic Growth Options and Spatial Strategy Options Background Papers, respectively). However, the scope for the Replacement LDP to contribute to affordable housing provision is not only dependent on identified need but also on viability and deliverability considerations, which will now be outlined.

Table 1: Total Housing Need by Tenure, Replacement LDP Period (2018-33)

Housing Market Area	Social Rent Need	Intermediate Need	Total Need
Bridgend and Surrounding	947.9	965.85	1913.75
Garw Valley	97.85	10.55	108.40
Llynfi Valley	199.9	74.5	274.40
Ogmore Valley	112.35	12.65	125.00
Pencoed and Heol y Cyw	226.15	215.15	441.30
Porthcawl	746.15	506.35	1252.50
Pyle, Kenfig and Cornelly	356.9	349.2	706.10
Valleys Gateway	151.4	161.15	312.55
Total	2838.60	2295.40	5134.00

4. Viability and Deliverability Evidence

4.1 The Plan-Wide Viability Assessment (2021) assessed broad levels of development viability across the same eight HMAs within the County Borough, maintained to ensure the evidence base is consistent and comparable. Viability was tested for a range of different site typologies across each HMA, reflecting an appropriate affordable housing contribution (as per the LHMA) and locally derived housing mix. All appraisals were undertaken to reflect costs and values at a fixed point in time, having been informed based on a series detailed discussions with a local representative steering group from January to September 2020. The scenarios appraised in the Plan-Wide Assessment will therefore not necessarily match any future actual development due to changing variables and/or specific development costs that may arise on certain sites. However, the scenarios do provide a robust basis to inform policy development based on a series of robust assumptions discussed at length with the steering group. The Assessment ultimately identified broad development viability across different HMAs, detailing the extent to which sites in different areas can contribute to the delivery of infrastructure, affordable housing and other LDP policy requirements.

- 4.2 Following Development Plans Manual guidance, the Plan-Wide Assessment ultimately considered a range of different affordable housing contributions within each HMA to determine whether “the affordable housing targets and thresholds selected are viable for the majority of cases” (WG, 2020, p.148). Each notional appraisal therefore indicated whether the target profit could be achieved after factoring in affordable housing together with all other costs, fees, profit margins, benchmark land values, contingencies and s106 contributions.
- 4.3 The steering group also stressed the importance of taking the proposed changes to Part L of Building Regulations into account, based on an expectation that they will be introduced in Wales in 2021. Whilst these are currently draft proposals, the Council recognises the importance of considering potential future changes to building regulations to ensure the viability testing remains relevant, up-to-date and robust. As such, the Plan-Wide Viability Assessment was conducted in two parts. Part one tested viability scenarios without any additional costs factored in for the proposed Part L changes. Part two tested viability scenarios considering appropriate additional ‘per dwelling’ costs to encompass the changes to Part L. This is considered to be a rational approach to incorporate the concerns highlighted by the steering group, whilst future-proofing the assessment (further details are outlined in the Plan-Wide Viability Assessment 2021).
- 4.4 The headline findings of the Plan-Wide Viability Assessment are detailed in Table 2. The first conclusion is that, with the exception of the Llynfi, Ogmere and Garw Valleys, all of the notional sites are considered viable based on varying levels of affordable housing provision. The strongest market is undoubtedly Porthcawl, which can support the largest affordable housing contribution, followed by the mid-market areas of Pen-coed and Bridgend. The Valleys Gateway has accommodated significant development in recent years and is viable based on somewhat more modest nil-grant affordable housing level.
- 4.5 The proposed changes to Part L of the Building Regulations clearly had an impact on the percentage of affordable housing that these notional sites could support, resulting in a 5% reduction in each of the aforementioned HMAs. The impact is most significant in Pyle, Kenfig and Cornelly, with the scenarios demonstrating a need to reduce the affordable housing contribution from 10% to 0%.
- 4.6 For the avoidance of doubt, the percentages detailed in Table 2 are based on a threshold of 10 residential dwellings. Potential for an affordable housing policy has been considered for sites smaller than 10 dwellings, although application of a broad percentage to sites of this scale does increasingly result in ‘partial unit’ contributions and presents bespoke viability issues, particularly

where rounding up to one dwelling can impact upon a small scheme coming forward. This factor combined with more widely varying build costs, bespoke property types, atypical sale values and alternative land value aspirations all render application of a generic affordable housing policy inappropriate for sites below 10 units.

Table 2: Plan-Wide Viability Assessment Findings

Housing Market Area	Affordable Tenure Split (as per LHMA)	Affordable Housing Viable (without Part L changes)	Affordable Housing Viable (with Part L changes)
Bridgend and Surrounding	50% social 50% intermediate	20%	15%
Pencoed and Heol y cyw	50% social 50% intermediate	20%	15%
Porthcawl	60% social 40% intermediate	35%	30%
Pyle, Kenfig and Cornelly	50% social 50% intermediate	10%	0%
Valleys Gateway	50% social 50% intermediate	15%	10%
Llynfi Valley	70% social 30% intermediate	0%	0%
Ogmore and Garw Valleys	90% social 10% intermediate	0%	0%

* The transfer value for the social rented units was set at 42% of Acceptable Cost Guidance for the appropriate band. The transfer value for the intermediate units was set at 70% of market value (for all areas except Porthcawl, which was based on a 60% of market value transfer value). In all cases, affordable housing contributions were tested on the basis of no capital grant being made available.

- 4.7 Whilst the changes to Part L of the Building Regulations have not yet been implemented, it is understood that these changes are likely to be implemented in 2021/22. Therefore, in order to future-proof the Replacement LDP in this respect, the area-wide affordable housing policies have been set based on the ‘with Part L changes’ factored in.
- 4.8 However, within any broad HMA, there will inevitably be pockets of higher or lower viability, the nuances of which can never be fully captured in an area-wide study of this type. As outlined within the Development Plans Manual,

The evidence can either be generic (across wide ranging geographical areas) or much more specific (based on local circumstances). Either, or both, can be appropriate. A combination of the two can be used to maximise policy gains, such as capturing affordable housing ‘hot spots’ within a much broader low value geographical area. Local data, potentially from actual site negotiations, could indicate higher policy targets rather than accepting a more generic, lower value approach (WG, 2020, p.49).

- 4.9 Inevitably, a site-specific appraisal will enable more detailed information to be considered with regard to the site specific context. As highlighted by Welsh Government, “much more insight can be gained which can result in refined affordable housing targets, as opposed to the broader area identified in the high level appraisal. The two are not contradictory, rather the site specific being a refinement of the high level appraisal” (WG, 2020, para 5.89).
- 4.10 Site-specific testing for sites key to delivery of the Plan and smaller housing allocations has therefore been conducted to capture such factors. The Council has maintained continuous dialogue with respective site promoters to demonstrate that these sites can be delivered through analysis of more specific costs, constraints and site requirements. Unlike the Plan-Wide Viability Assessment, therefore, the site-specific appraisals are distinct in nature and consider more detailed contextual intricacies. This dual-faceted approach is paramount to ensure Council’s aspirations for delivering high-quality new communities are both realistic and deliverable. This evidence has indicated that higher levels of affordable housing can be supported on certain sites as detailed within Table 3 (see also: Potential Strategic Sites Independent Financial Viability Appraisals Report, 2021). For the avoidance of doubt, all of the site-specific appraisals underpinning the targets in Table 3 have factored in additional costs arising from the proposed changes to Part L of the Building Regulations. In all cases, the viability testing demonstrated the level of affordable housing the sites can support would be unaffected by these additional costs based on their specific circumstances. All of the sites detailed within Table 3 have been proposed for allocation within the Replacement LDP (refer to the Candidate Site Assessment Report, 2021 and the Housing Trajectory Background Paper).

Table 3: Site-Specific Viability Assessment Findings

Site Name	Growth Area	Total Units in Plan Period	Affordable Housing Viable (with Part L changes)	Total Affordable Units in Plan Period	Delivery Timescale	Units Beyond Plan Period
Porthcawl Waterfront	Porthcawl	1,020	30%	335	Year 6-15	95
Land South of Bridgend	Bridgend	847	20%	169	Year 6-15	0
Land West of Bridgend	Bridgend	810	20%	170	Year 6-15	40
Land East of Pencoed	Pencoed	770	20%	154	Year 6-15	0
Land East of Pyle	Pyle, Kenfig Hill and North Cornelly	1,057	15%	300	Year 6-15	943
Parc Afon Ewenni	Bridgend	675	20%	135	Year 6-15	0
Craig y Parcau	Bridgend	110	20%	22	Year 6-10	0
Land South East of Pont Rhyd-y-cyff	Maesteg and the Llynfi Valley	140	15%	21	Year 6-10	0
Land South of Pont Rhyd-y-cyff	Maesteg and the Llynfi Valley	102	15%	15	Year 6-15	0
Land South West of Pont Rhyd-y-cyff	Maesteg and the Llynfi Valley	130	15%	20	Year 6-10	0

5. Replacement LDP Policy Implications

- 5.1 PPW is clear that “development plans must include a target for affordable housing (expressed as numbers of homes)” (WG, 2021, para. 4.2.28). This should be based on the LHMA and identified through the expected contributions that the LDP, and its policies, will make to meeting this target, whilst taking account of both deliverability and viability considerations. These latter points are pertinent as the level of affordable housing contributions that can be secured through the planning system is integrally dependent on how viable it is for different areas and sites to provide affordable housing, along with all other necessary planning contributions. Edition 3 of the Development Plans Manual confirms, “LPAs should maximise the delivery of affordable housing in their LDP, based on the viability evidence of allocations/sites in their plan” (WG, 2020, para 5.105).
- 5.2 There also needs to be a clear recognition that the Replacement LDP is not the only source of affordable housing supply and it would be a gross oversimplification to set a target that directly mirrors the 5,134 affordable housing units identified as being needed over the plan period. The LHMA itself clarifies that this headline need figure should not be considered a delivery target or even the solution to the affordability issues within the County Borough. It instead indicates the level of housing need within the County Borough, which the Council will seek to address through a range of market interventions as far as practically deliverable. These complementary sources of supply include, although are not limited to, Social Housing Grant and other capital/revenue grant funded schemes, Registered Social Landlord self-funded schemes, reconfiguration of existing stock, private sector leasing schemes, discharge of homelessness duties into the private rented sector and re-utilisation of empty properties.
- 5.3 Each component of affordable housing supply (that the Replacement LDP can realistically deliver) has been carefully considered in relation to the need identified in the LHMA before arriving at an affordable housing target. The outcome of this exercise is summarised in Table 4 overleaf and each component will now be elaborated on in turn.

Table 4: Affordable Housing Supply Components 2018-33 (as at 31st March 2021)

Components	Number of Affordable Housing Units
Total Completions (large and small)	323
Units under construction	53
Units with planning permission (large sites)	216
New Housing Allocations	1,341
Large windfall sites (10+ units)	44
Small windfall sites (<10 units)	0
Total LDP Affordable Supply	1,977

- 5.4 There have been a total of 323 affordable housing completions in the first three years of the Replacement LDP period (2018/19, 2019/20 and 2020/21). Equally, there were 53 affordable housing units under construction as at 31st March 2021, with 216 affordable units with planning permission forecast for delivery over the remaining plan period. All of these sites are detailed in Appendix 2, form part of the existing housing land bank (i.e. sites with planning permission) and are expected to be delivered by 2023/24. The only exception to this is the 42 affordable units at Land off Maesteg Road, Tondu, which is a larger site in the housing land bank (405 dwellings in total) that is forecast for completion by 2028/29. Affordable units that have been completed, or have planning permission and are due to be completed over this period, include Social Housing Grant funded, RSL-led schemes and also nil-grant affordable housing units secured through s106.
- 5.5 No further assumptions have been made regarding the availability of Social Housing Grant or other capital grant funding during the remainder of the Replacement LDP period, over and above those sites subject to grant support with planning permission. This is ultimately because such funding sources are not guaranteed at this point of plan preparation. Therefore, the remaining components of affordable housing supply stem from the nil-grant affordable housing contributions that the Replacement LDP has demonstrated it can deliver. In total, 1,341 affordable homes are expected to come forward on sites proposed for allocation (detailed in Table 3), evidenced as deliverable through the aforementioned site-specific viability appraisals. In order to facilitate creation of mixed communities, these units will be delivered through sustainable clusters of no more than ten affordable units, interspersed throughout the respective developments. Discrete clusters of more than 10 affordable units can otherwise become increasingly uncondusive to the delivery and maintenance of balanced, mixed tenure communities.

- 5.6 Large windfall sites (10+ dwellings) are expected to contribute 44 dwellings per annum to the total housing supply over the Replacement LDP period (refer to the Housing Trajectory Background Paper and Urban Capacity Study, 2020). This produces a projected windfall allowance of 440 dwellings over the final 10 years of the Replacement LDP period (the rate has only been applied from 2023/24 to avoid any double counting with existing landbank commitments). As the specific location and composition of windfall sites is unknown, it is not possible to accurately apply the relevant affordable housing percentage as per the housing market areas detailed in Table 2. Therefore, it has been estimated that this component of housing supply could contribute 10% nil-grant affordable housing provision over the Plan Period (i.e. 44 affordable dwellings). As the affordable housing policy threshold is 10 dwellings, small windfall sites (of less than 10 dwellings) are not expected to contribute to the total nil-grant affordable housing provision over the plan period (refer to Plan-Wide Viability Assessment, 2021). In both cases, grant funding or otherwise, could enable 100% affordable housing sites to be delivered as small or large windfall sites, thereby further bolstering these components of affordable housing supply. However, these additional affordable housing delivery streams have not been included at this stage of plan preparation as they are not guaranteed.
- 5.7 Therefore, during the Replacement LDP period, all components identified in Table 4 are expected to deliver a total of 1,977 affordable dwellings across the County Borough in order to contribute to the level of housing need identified by the LHMA. This represents the overall affordable housing target, comprised of the individual components of affordable housing supply that are expected to be funded and delivered through the planning system. The Council considers on-site provision to be the optimal means of delivering affordable housing in order to foster sustainable, balanced, mixed-tenure communities across the County Borough. The thresholds for and percentages of affordable housing provision have been set with regard to the housing need identified within the LHMA, the Plan-Wide Viability Assessment and site-specific viability testing.
- 5.8 The remaining need for affordable housing (identified in the LHMA) will be delivered through a range of other mechanisms as exemplified within paragraph 5.2. These mechanisms are outside the scope of the Replacement 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 plan period. On this basis, no further allowance has been made to factor in such alternative affordable housing delivery mechanisms at this stage of plan preparation.

Affordable Housing Exception Sites

- 5.9 The Replacement LDP directs the majority of growth towards areas that already benefit from good infrastructure, services and facilities, or where additional capacity can be provided, in order to facilitate sustainable placemaking. Development of land within or on the periphery of urban areas is therefore prioritised, especially on previously developed 'brownfield' sites. Whilst the Council expects the majority of development to take place within the defined settlement boundaries, it is recognised that certain area specific factors (such as limited developable land and high land prices) may be prohibitive to affordable housing delivery in this manner. The Replacement LDP therefore includes an affordable housing exception policy, which is an exception to the general housing provision policies that do not otherwise permit new housing outside settlement boundaries. However, any resultant development will still need to have reasonable access to local community services and facilities in nearby settlements and meet the specified criteria and other relevant policies of the LDP. Development will also need to respond to a pressing need identified by the LHMA and/or Local Housing Authority and comprise of no more than 10 affordable units. This is the appropriate size for a sustainable cluster of affordable housing as required on larger housing developments and is therefore equally 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.
- 5.10 The Replacement LDP will seek to deliver the identified affordable housing target within the designated settlement boundaries in accordance with placemaking principles. Promotion of significant levels of development in the countryside (affordable housing or otherwise) is not considered conducive to sustainable placemaking and will only be permitted in limited, exceptional circumstances to meet a pressing housing need. Moreover, affordable housing exception sites, which are exceptions to general housing provision by their very nature, are not specifically allocated within the Plan. For these reasons, no further allowance has been made to incorporate affordable housing delivered on exception sites as a component of affordable housing supply. The affordable housing contribution from this policy is expected to be purposely small in scale and exceptional in circumstance.

Affordable Housing Led Sites

- 5.11 PPW emphasises the need for planning authorities to "make provision for affordable housing led housing sites in their development plans". It is stated that, "such sites will include at least 50% affordable housing based on criteria reflecting local circumstances which are set out in the development plan and relate to the creation of sustainable communities" (WG, 2021, para 4.2.32). The Development Plans Manual also clarifies the need for planning authorities to "maximise the delivery of affordable housing in their LDP, based on the viability evidence of allocations/sites in their plan. Sites for affordable housing led schemes can be allocated. Policies

must be based on this evidence, unless supplementary local evidence or site specific work indicates otherwise” (WG, 2020, para 5.105).

5.12 The potential for affordable housing led sites to be allocated within the Replacement LDP was carefully considered a part of the Plan-Wide Viability Assessment and the site-specific viability appraisals. A range of affordable housing percentages and thresholds were tested to determine the level of affordable housing provision that could be viably supported within different HMAs and on different sites. However, the evidence base has clearly demonstrated that it is not viable for affordable housing led sites (including at least 50% affordable housing) to be allocated in the Replacement LDP without supporting capital grant funding, which is not guaranteed. The forthcoming changes to Part L of the Building Regulations has served to further impact upon affordable housing delivery in this respect. As the Development Plans Manual states, “If an affordable housing target is set too high it is unlikely that those levels will be delivered and may impact on the delivery of sites and elongate the development management process. The targets chosen must be realistic and align with the evidence base and the assumptions within it” (WG, 2020, para. 5.107). The affordable housing targets, thresholds and percentages detailed within this Paper are indeed considered realistic and align with the robust evidence base. There is no deliverability evidence to support allocation of an affordable led housing site (with at least 50% affordable housing) at this stage of plan preparation. However, higher proportions of affordable housing could indeed be secured on any of the allocated sites in the Replacement LDP should capital grant or revenue funding be secured during the LDP period. Opportunities will be explored to strategic increase the supply of affordable housing through such means over the plan period.

6. Conclusion

6.1 This Paper has detailed how the evidence-based affordable housing policies in the Replacement LDP have been developed, through due consideration of housing need, deliverability and viability factors in a manner that focuses on the creation and enhancement of Sustainable Places. The scale and location of housing need identified by the LHMA has influenced the Replacement LDP’s Growth and Spatial Strategy. However, the scope for the Replacement LDP to contribute to affordable housing provision is not only dependent on identified need but also on viability and deliverability considerations. It must also be recognised that the Replacement LDP is not the only source of affordable housing supply. This Paper therefore documented how different market areas can affect the viability of delivering private and affordable housing as well as associated infrastructure to support the level of development proposed. This has ensured formulation of realistic affordable housing policies, which include both area-based and site-specific targets and thresholds. An overall affordable housing target of 1,977 affordable dwellings has been identified through the expected contributions that the Replacement LDP, and its policies, will make over the plan period.

Appendix 1: Detailed LHMA Housing Need Tables

Table 1: Housing Need Calculation for Bridgend County Borough (Annual Need, First 5 Years of LHMA Period)

Housing Market Area	General Needs Social Rent				Accessible Social Rent				Sheltered Social Rent		Social Rent Need	Intermediate Need (primarily LCHO)	Total Need
	1 Bed	2 Bed	3 Bed	4 Bed	1 Bed	2 Bed	3 Bed	4 Bed	1 Bed	2 Bed			
Bridgend and Surrounding	55.77	4.63	7.25	4.87	1.95	0.94	0.64	0.49	0.00	0.02	76.56	67.61	144.17
Garw Valley	15.26	0.00	0.00	0.27	0.32	0.05	0.03	0.00	0.00	0.00	15.93	2.11	18.04
Llynfi Valley	27.68	0.00	0.00	0.65	0.58	0.20	0.29	0.00	0.00	0.00	29.40	6.80	36.20
Ogmore Valley	18.91	0.00	0.57	0.00	0.43	0.00	0.02	0.00	0.00	0.00	19.93	2.53	22.46
Pencoed and Heol y Cyw	18.94	0.00	0.00	0.32	0.38	0.12	0.11	0.06	0.00	0.00	19.93	14.79	34.72
Porthcawl	34.37	6.56	7.12	2.32	0.47	0.32	0.14	0.02	0.00	0.05	51.37	33.93	85.30
Pyle, Kenfig and Cornelly	33.27	0.00	0.00	2.42	1.20	0.58	0.43	0.12	0.00	0.06	38.08	27.92	66.00
Valleys Gateway	22.24	0.00	2.31	1.55	1.38	0.49	0.44	0.43	0.00	0.00	28.84	15.35	44.19
Total	226.44	11.19	17.25	12.4	6.71	2.70	2.10	1.12	0.00	0.13	280.04	171.04	451.08

Table 2: Housing Need Calculation for Bridgend County Borough (Annual Need, Remaining 10 Years of LDP Period)

Housing Market Area	Social Rent*				Social Rent Need	Intermediate Need (primarily LCHO)	Total Need
	1 Bed	2 Bed	3 Bed	4 Bed			
Bridgend and Surrounding	43.66	4.53	6.64	1.68	56.51	62.78	119.29
Garw Valley	1.82	0.00	0.00	0.00	1.82	0.00	1.82
Llynfi Valley	5.20	0.00	0.00	0.09	5.29	4.05	9.34
Ogmore Valley	0.91	0.00	0.36	0.00	1.27	0.00	1.27
Pencoed and Heol y Cyw	12.65	0.00	0.00	0.00	12.65	14.12	26.77
Porthcawl	34.37	6.56	6.50	1.50	48.93	33.67	82.6
Pyle, Kenfig and Cornelly	16.06	0.00	0.00	0.59	16.65	20.96	37.61
Valleys Gateway	0.00	0.00	0.65	0.07	0.72	8.44	9.16
Total	114.67	11.09	14.15	3.93	143.84	144.02	287.86

* Further social rented tenure splits between general needs, accessible and sheltered have not been conducted beyond year 5 (due to increased ambiguity at this point) and will instead be re-assessed through future LHMA updates.

Appendix 2: Existing Land Bank (Sites with Planning Permission) with Affordable Housing Provision, Delivered, Under Construction and Forecast for Delivery, 2018-2033

Settlement Tier / Growth Area	Planning Application	Site Name	Total Site Capacity (All tenures)	Affordable Housing Completions (18/19-20/21)	Affordable Housing Under Construction (as at 31 st March 2021)	Affordable Housing Units Forecast for Delivery (2021/22 onwards)
Valleys Gateway (Main Settlement)	P/19/915/RES	LAND OFF MAESTEG ROAD, TONDU	405	0	0	42
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/19/624/FUL P/19/656/RES	PARC DERWEN, BRIDGEND	1577	0	0	21
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/18/145/RES	LAND AT LLANGEWYDD ROAD, CEFN GLAS, BRIDGEND	194	25	0	14
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/18/983/FUL	SUNNYSIDE ROAD (LAND OFF), BRIDGEND	59	0	19	40
Pen-y-fai (Local Settlement)	P/17/1073/FUL	ALL SAINTS WAY (LAND SOUTH OF), PENYFAI	20	3	0	0
Porthcawl (Main Settlement, Regeneration Growth Area)	P/18/908/FUL	MEADOW LANE (LAND AT), PORTHCAWL	24	0	24	0

Settlement Tier / Growth Area	Planning Application	Site Name	Total Site Capacity (All tenures)	Affordable Housing Completions (18/19-20/21)	Affordable Housing Under Construction (as at 31 st March 2021)	Affordable Housing Units Forecast for Delivery (2021/22 onwards)
Porthcawl (Main Settlement, Regeneration Growth Area)	P/18/920/FUL	RONNIES COMMERCIAL, CLOS YR ORSAF, PORTHCAWL	10	0	10	0
Cefn Cribwr (Local Settlement)	P/18/286/NMA	BEDFORD ROAD, CEFN CRIBBWR	10	0	0	10
Porthcawl (Main Settlement, Regeneration Growth Area)	P/20/263/FUL	FORMER ST. JOHN'S SCHOOL, NETWON, PORTHCAWL	56	0	0	8
Porthcawl (Main Settlement, Regeneration Growth Area)	P/16/609/FUL	47 - 49 WOODLAND AVENUE (Land Between), PORTHCAWL	10	0	0	10
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/14/185/FUL	WATERTON MANOR & LANE (LAND AT) WATERTON, BRIDGEND	39	0	0	26
Pyle, Kenfig Hill and N Cornelly (Main Settlement, Sustainable Growth Area)	P/18/829/FUL	LAND AT CROFT GOCH ROAD, KENFIG HILL	21	0	0	21
Pencoed (Main Settlement, Sustainable Growth Area)	P/20/214/FUL	FORMER PENCOED RAOB SOCIAL CLUB HEOL Y GROES, PENCOED	24	0	0	24

Settlement Tier / Growth Area	Planning Application	Site Name	Total Site Capacity (All tenures)	Affordable Housing Completions (18/19-20/21)	Affordable Housing Under Construction (as at 31 st March 2021)	Affordable Housing Units Forecast for Delivery (2021/22 onwards)
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/13/246/OUT, P/14/464/OUT	NORTH EAST BRACKLA REGENERATION AREA, BRIDGEND	558	12		
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/15/379/FUL	JUBILEE CRESCENT, BRIDGEND	48	48		
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/16/985/FUL	PARC FARM, NORTH EAST OF PARC DERWEN, BRIDGEND	24	24		
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/16/606/FUL	FORMER OCLP CLUBHOUSE, ELM CRESCENT, BRIDGEND	18	18		
Valleys Gateway (Main Settlement)	P/16/600/FUL	FORMER ARCHBISHOP MCGRATH SCHOOL (LAND AT) - SITE A, TONDU	44	44		
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/15/60/FUL, P/17/433/FUL	RHIW / BRACKLA STREET SHOPPING CENTRE, BRIDGEND	38	10		
Maesteg and the Llynfi Valley (Main Settlement, Regeneration Growth Area)	P/16/607/FUL	BRIDGEND ROAD, FORMER SCHOOL PLAYING FIELD, MAESTEG	37	37		

Settlement Tier / Growth Area	Planning Application	Site Name	Total Site Capacity (All tenures)	Affordable Housing Completions (18/19-20/21)	Affordable Housing Under Construction (as at 31 st March 2021)	Affordable Housing Units Forecast for Delivery (2021/22 onwards)
Bridgend (Primary Key Settlement, Sustainable Growth Area)	P/17/393/FUL, P/18/410/FUL	BRYN BRAGL, BRACKLA, BRIDGEND	14	14		
Pencoed (Main Settlement, Sustainable Growth Area)	P/18/174/FUL	PENCOED PRIMARY SCHOOL	40	40		
Heol-y-Cyw (Local Settlement)	P/18/759/FUL	HEOL Y CYW PRIMARY SCHOOL	13	13		
Pyle, Kenfig Hill and N Cornelly (Main Settlement, Sustainable Growth Area)	P/15/856/FUL	AEL Y BRYN 65 - 66 (LAND TO REAR OF), NORTH CORNELLY	23	23		
AFFORDABLE COMPLETIONS ON SMAL SITES:				12		
Total Affordable Dwellings:				323	53	216