

LDP2 **Ceredigion**

**Replacement Local Development Plan
2018 - 2033**

**Topic Paper: Housing Delivery
for Preferred Strategy 2019**



Cyngor Sir
CEREDIGION
County Council

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Glossary

USC	Urban Service Centre
RSC	Rural Service Centre
LS	Linked Settlement
OL	Other Location
WG	Welsh Government
AMR	Annual Monitoring Report
JHLAS	Joint Housing Land Availability Study
RSL	Registered Social Landlord

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1. Executive Summary

- 1.1.1 This paper examines the position regarding outstanding housing consents, completions and extant permissions across the County and seeks to identify a mechanism for discounting a proportion of extant housing consents.

2. Introduction

- 2.1.1 This paper seeks to draw on evidence to establish the extent to which under delivery of some outstanding and extant housing consents is problematic for the successful implementation of planning policy for housing and the delivery of housing to meet identified need in LDP2 of 2437.
- 2.1.2 The adopted Ceredigion Local Development Plan (LDP) projected a need for 6000 homes for the period 2007 to 2022, an average annual requirement of approximately 400 homes. This has not materialised and the revised growth figure projected for LDP 2 is half of this initial requirement.
- 2.1.3 Housing delivery in Ceredigion is low, compared with identified need and the figure for outstanding consent is high. Population and household growth projections contribute to the problem and are the subject of a separate paper which recommends a lower housing requirement for the replacement Plan (of 3000 with a flexibility allowance incorporated).
- 2.1.4 This report considers Ceredigion's profile in a regional context to establish whether this is indicative of the national picture or is Ceredigion unique in this problem of low completion to consent ratio and also examines the influence of housing type and location on completion of consents.
- 2.1.5 The Authority has undertaken a detailed analysis of housing delivery to inform this paper. Section 1-7 provides a range of housing delivery evidence to determine the situation and consequently, the issues within Ceredigion. Section 8 discusses the non-delivery allowance and possible calculations for applying the allowance to Ceredigion's housing figures. Section 9 explains how Powys County Council has implemented a non-delivery figure for its

recently adopted LDP and how Welsh Government's emerging Development Plans Manual Edition 3 (draft for informal consultation, October 2018) supports using a non-delivery allowance should evidence suggest the need. The final section addresses the AMR and concludes the report and presents recommendations for the non-delivery allowance to be applied in LDP 2.

- 2.1.6 The report provides a summary and analysis of each of the methodologies employed in considering these issues in turn and identifies the successes and shortcomings revealed by these sources.
- 2.1.7 To note: Table 1 includes data from both monthly monitoring and Annual Monitoring Report (AMR) whilst table 2 elaborates on the data from the monthly monitoring. Table 3 is information from the Joint Housing Land Availability Study (JHLAS). All other tables are created with data from the same source – an internal spreadsheet of data which derives from the Annual Completion Survey (*All Outstanding App Units and Extant Info Spreadsheet*). This is to allow for consistency throughout and for true comparison. Despite the outstanding consents varying slightly (26 units) from the AMR data, the proportion and breakdown of each are not impacted on.

3. Section 1: Number of Outstanding Consents and Completions

3.1.1 This section looks at the spatial distribution of completions and consents. As of April 2018, there were nearly 1500 outstanding consents:

Table 1: Distribution of Ceredigion Consents: April 2018

	Outstanding Consents		% Break Down	% Target Break Down by April 2018	% Target Break Down End of Plan Period 2022
	Monthly Monitoring April 2018	AMR 2018			
USC	656	655	45%	48%	51%
RSC	292	291	20%	22%	24%
LS and OL	519	504	35%	29%	25%
Total	1467	1450	100%	100%	100%

3.1.2 This indicates that the distribution of outstanding consents is not in line with the target percentage splits for distribution of consents countywide. This is shown through an over provision of outstanding consents in Other Locations and Linked Settlements, it is worth noting that the margin the plan is out from its April 2018 target is small and demonstrates slow but steady progress towards the targets from plan start. The AMR has noted that the distribution of consents across the county is out of balance with the formal target of 51: 24: 25 by the end of the plan period for the three categories of USC, RSC and LS/OL. It is worth noting that many of these outstanding consents were permitted prior to adoption of the LDP as all permissions approved from 2007 and any back log at that point were carried forward into the LDP strategy. The AMR monitors this balance, as it was a point of concern from plan start given the existing back log of consents in less sustainable

settlements. The monitoring does show that there has been small positive improvements in the county balance of consents when considering permissions approved since adoption of the LDP and therefore subject to the new policy regime but the speed of this change is insufficient to meet the targets by 2022 primarily due to the slow delivery of housing countywide since the 2008 recession. This is unsurprising given that LDP 1 allowed for a much larger level of growth than was required upon subsequent revisions of the population projections and the prolonged economic downturn.

- 3.1.3 Whilst Table 1 discusses the outstanding consents and subsequent break down by settlement group, Appendix 1 and 2 elaborates on this and shows the data for each USC, RSC and Linked Settlement. The data shown is regarding outstanding consents, the amount of dwellings that have been built and the remaining allowance. The remaining allowance is based on the 12% growth rate that LDP 1 planned for within each location within the USCs, RSCs and LS (with the exception of Aberystwyth). The data in Appendix 2 will highlight the issue regarding the growth of development in the Linked Settlements. However, the details of this issue along with possible solutions will be discussed further in another paper. Table 2 considers commitments (i.e. cumulative completions plus outstanding consents) since 2009.

Table 2: Countywide Year on Year Totals

Monitoring Year	Completions	Outstanding Consents	Total Commitments
2007-2007	No data available		
2008-2009	No data available		
2009-2010	607		
2010-2011	897	1714	2611
2011-2012	1169	1996	3165
2012-2013	1268	1865	3133
2013-2014	1421	1743	3164

Monitoring Year	Completions	Outstanding Consents	Total Commitments
2014-2015	1546	1546	3092
2015-2016	1765	1512	3277
2016-2017	1939	1746	3685
2017-2018	2044	1467	3511

- 3.1.4 The annual completion rate anticipated in the LDP was for 400 units a year, the actual annual completion rate has been an average of 180 units with a lowest rate of 99 units between 2011-2012 and 2012-2013 and the highest rate of 290 units between 2009-2010 and 2010-2011. The rate has been significantly lower than that originally envisaged in the LDP and the lower rate than normal in recent years reflects the lower than average completion rates across the UK as a whole. This is as a result of the collapse of the market in 2008 amid the global recession as well as a number of other related factors such as market confidence expectations of planning obligations on market housing to find affordable housing, increases in planning fees, the continuing tightening of the mortgage markets and the increasing disparity between incomes and market housing prices. Many of these factors are common to local authorities across Wales, with resultant low completion rates an issue in common and LPAs have little way of influencing the market. Consequently, low completion rates are a common issue and Local Planning Authorities have little way of influencing the market.
- 3.1.5 In terms of the outstanding consents figure this has reduced year on year since 2010 (except for 2016-2017) and is likely to be a reflection of the changed economic circumstance i.e. less people are applying for 'speculative' consent, combined with the Authority progressing an 'use it or lose it' policy intervention in the form of not renewing consents, encouraging development through pre-application advice, issuing short permissions and developments coming forward on windfall sites only where they are confident

of the site's implementation. However there is still a significant backlog for which a solution is required within the planning framework as a significant proportion of the outstanding consents are unlikely to come forward to completion.

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4. Section 2: What types of sites are coming forward?

Table 3: Small site completion figures for Ceredigion and surrounding authorities

Local Authority	Small Site Completions	Large Residential Site Completions	Total Completions	Percentage of development that is from small sites
Ceredigion (2017-2018)	53	51	104	51%
Carmarthenshire (2017-2018)	105	406	511	21%
Pembrokeshire (2017-2018)	55	231	286	24%
Powys (2015-2016)	78	237	315	25%
Gwynedd (2017-2018)	153	309	462	33%

4.1.1 The above table highlights the percentage of development that occurred on small sites in Ceredigion and bordering authorities. Within Ceredigion, applications of 5 or more units are considered large sites whilst small sites are considered to be 4 or less. Due to the rural nature of the county and the distinct lack of larger developers and volume builders which results in a high level of small scale windfall development, the majority of development within Ceredigion comes from completion on small sites. Development on the small sites often takes longer to be delivered and completed and draws no benefit from economies of scale. At over 50% this focus on small scale development is considerably greater than for neighbouring authorities (between 21% and 33%), further highlighting the issues facing Ceredigion with outstanding

consents as our evidence shows that small sites are more likely to become extant or remain outstanding than larger allocations.

- 4.1.2 Despite allocations having been purposely secured as large in LDP 1 with the hope of attracting or encouraging large volume developers and builders, this did not materialise. As Table 3 highlights the high level of development on small windfall sites, it is anticipated that this will not significantly change in the near future and that future development under the replacement Plan will be of small scale to cater for the building trade we do attract.
- 4.1.3 Housing development in Ceredigion has different characteristics to that in more urban Counties. It is not dominated by the large volume builders and includes a large number of individual landowners who apply for planning permission. There has been a tendency to secure planning consents in settlements without the clear intent to implement or deliver the units in the foreseeable future often for borrowing purposes or to future proof accommodation needs of family needs. This has often resulted from a pressure to secure a planning permission before the 'build quota' (12% growth rate) is used up. Moreover, there has been a permissive approach in place to the renewal of planning consents. Planning consents have also been preserved as being extant by virtue of 'technical starts' which support the motivations, in some instances, for obtaining planning consent rather than to secure a commercial intention to build. All these factors are tending to hamper genuine housing delivery and responsiveness to immediate needs.
- 4.1.4 Several developers have argued there is a lack of economies of scale due to increased construction costs of small developments in rural areas, intensified by increased travel and access costs and the general rise in the costs of construction. Developments can also face a number of additional costs relating to site suitability such as flood protection, sewage, drainage and access. A previous report on Housing Delivery completed by Ceredigion County Council received feedback from the development industry that highlighted that sites had become unviable to develop or that the provision to

supply affordable housing is not viable to specific sites. These costs become proportionately much higher for small developers on small developments of one to four units. Some developments also require the provision of new infrastructure, such as roads or utility suppliers and there are concerns about the role of the utility companies in facilitating small developments and affordable housing developments in rural areas.

- 4.1.5 A possible solution to the above issues would be partnership working. However, it is clear that partnership working is weak within Ceredigion with few sites showing any signs of this. There is a difficulty in getting RSLs and small local developers to work together on affordable housing, largely because of funding, timing and financial considerations.

5. Section 3: Sites not coming forward

5.1.1 Ceredigion has a high proportion of outstanding consents, many of which are extant sites. This is not a problem specific to Ceredigion as almost all of the UK, particularly since 2008 has seen a large number of outstanding consents and extant sites. The following tables examine whether there is a spatial dimension to the spread of extant sites across Ceredigion by settlement group as of April 2018. The data has been divided by units and permissions reflecting the fact many applications are for individual units in Linked Settlements and Other Locations as opposed to USC's and RSC's which are subject to allocated sites and larger permissions.

Table 4: Extants by Settlement Group

	Extant Units	Break Down %	Extant Permissions	Break Down %
USC	319	41%	48	17%
RSC	119	15%	27	9%
Linked Settlements	222	28%	105	37%
Other Location	123	16%	104	37%
Total	783	100%	284	100%

5.1.2 Table 4 demonstrates that applications for individual units such as those most commonly permitted in Linked Settlements and Other Locations make up the vast majority of the extant sites. Of the extant permissions, 74% are located in the Linked Settlements and Other Locations which is not only contrary to the strategy of the LDP but also stifling development in these locations for people who are in genuine need given the current policy S04 requires the settlement group to be in balance and the settlement not to have exceeded its 12% cap before any further market housing could be approved. In order to understand the realistic prospects of these consents

coming forward in the short to medium term it is important to know how long they have been available for development.

- 5.1.3 Tables 5 and 6 look at when units and permissions became extant. This gives an indication of how many have been extant for a long period and also can be compared with overall outstanding consents/extants. Tables 7 and 8 look at this in detail for different time periods.

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Table 5: Extant Units by Year

Settlement Group	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	Pre 2007
USC	22	45	8	45	59	20	29	1	5	56	0	2	27
RSC	7	2	0	21	53	4	6	0	5	2	10	1	6
LS	3	26	19	31	36	39	11	5	1	5	6	9	29
OL	1	11	8	14	19	10	5	13	1	4	6	1	30
Total	33	84	35	111	167	73	51	19	12	67	22	13	92

Table 6: Extant Permissions by Year

Settlement Group	2018	2017	2016	2015	2014	2013	2012	2011	2010	2009	2008	2007	Pre 2007
USC	1	7	6	6	6	3	5	1	2	4	0	2	7
RSC	2	2	0	5	4	2	3	0	1	1	1	1	3
LS	3	6	11	20	12	15	10	5	1	2	3	6	12
OL	1	7	7	8	14	19	10	4	11	4	6	1	19
Total	7	22	24	39	36	39	28	10	15	11	10	10	41

5.1.4 Those units listed as extant from 2013/2014 onwards have a reasonable prospect of being completed as they are relatively new permissions with time remaining on their consent and were permitted in the context of the LDP and therefore subject to the full range of policies in the adopted plan. Of particular focus are those older than this, whereby they have been available for development for over 5 years, approved under a different adopted plan and are therefore unlikely to be delivered.

Table 7: Breakdown of outstanding consents by their age, by site and unit number

Settlement Type	Total No of Outstanding Consents (=B+C)		A – Total No of these granted in last 2 years (2016/2017 & 2017/2018)		B – Total No of these granted in the last 5 years (A + 2013/2014, 2014/2015, 2015/2016)		C – Total Granted over 5 years ago (Pre 2013/2014)	
	Units	Permissions	Units	Permissions	Units	Permissions	Units	Permissions
USC	654	105	188	35	396	65	258	40
RSC	275	44	48	8	161	21	114	23
Linked Settlements	311	146	75	33	126	61	185	85
Other Locations	184	159	55	45	90	80	94	79
Total	1424	454	366	121	773	227	651	227

Table 8: Breakdown of extants by their age, by site and unit number (note extant = started)

Settlement Type	Total No of Extants (=B+C)		A – Total No of these granted in last 2 years (2016/2017 & 2017/2018)		B – Total No of these granted in the last 5 years (A + 2013/2014, 2014/2015, 2015/2016)		C – Total Granted over 5 years ago (Pre 2013/2014)	
	Units	Permissions	Units	Permissions	Units	Permissions	Units	Permissions
USC	319	48	32	4	105	15	214	33
RSC	119	27	2	1	29	8	90	19
Linked Settlements	222	105	5	5	40	22	182	83
Other Locations	123	104	8	4	30	26	93	78
Total	783	284	47	14	204	71	579	213

5.1.5 Table 8 and 9 highlight that the majority of extant permissions are of considerable age (75% of permissions were granted over 5 years ago) along with 50% of the outstanding consent permissions. This makes them all the more likely not to be completed due to modern standards and homeowner requirements having changed and consequently, the development that was granted would not meet modern requirements. If the developments were to come forward, it is likely that a new application would be required to alter the design to meet these modern requirements, and where it is outside of that permitted under the policies in the LDP would likely be subject to a refusal.

5.1.6 It is worth noting that a large majority of the extant permissions that were granted over 5 years ago are located in the Linked Settlements and Other Locations. Under LDP policies should a new application come in, in the majority of these locations the only justification would be for an affordable home to meet immediate local needs. It would be difficult for applicants to demonstrate this was the case given the permission has been extant for such a significant period of time.

Table 9: Outstanding Consents vs Extant Comparison (Permissions)

Settlement Group	Outstanding Consents	Extants	Break Down %
USC	105	48	46%
RSC	44	27	61%
Linked Settlements	146	105	72%
Other Locations	159	104	65%
Total	454	284	63%

5.1.7 Table 9 outlines the percentage of outstanding consents within individual tiers of the settlement hierarchy that are extant and demonstrates that the proportion of extants to outstanding consents (the 'breakdown') is higher in

the Linked Settlements and Other Locations in comparison to the USCs and RSCs.

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6. Section 4: Large Sites

6.1.1 Considering small and large sites separately this section will outline the extant units and permissions on large sites (5 or more units) in comparison to total outstanding consents.

Table 10: Large Site (5 or more units) Extant vs Outstanding Consents

Settlement Group	Outstanding Consents		Extant Units		Break Down %	
	Permissions	Units	Permissions	Units	Permissions	Units
USC	35	536	17	266	49%	50%
RSC	16	239	11	95	69%	40%
Linked Settlements	28	157	20	117	71%	75%
Other Locations	7	40	5	20	71%	50%
Total	86	972	53	498	64%	51%

6.1.2 This indicates that development on larger sites is more likely to come forward the higher up the settlement hierarchy i.e. USCs and RSCs. In Linked Settlements and Other Locations which under the LDP are not generally seen as appropriate for development of this scale a significant majority (64% of permissions) of the outstanding consents for large sites are extant (although the numbers are lower in Other Locations as these are not the locations you would expect to see permissions for 5 or more units). However given a proportion of the outstanding and extant consents have been approved prior to adoption of the LDP. There are some approvals for large sites in Linked settlements and other locations approved under the UDP or Dyfed Structure Plan.

7. Section 5: Small Sites

7.1.1 This section will outline the extant units and permissions on small sites (4 units or less) compared with the total outstanding consents.

Table 11: Small Site (1-4 units) Extant vs Outstanding Consents

Settlement Group	Outstanding Consents		Extant Units		Break Down %	
	Permissions	Units	Permissions	Units	Permissions	Units
USC	70	118	31	53	44%	45%
RSC	28	36	16	24	57%	67%
Linked Settlements	118	154	85	105	72%	68%
Other Locations	154	166	99	105	64%	63%
Total	370	474	231	287	62%	61%

7.1.2 Table 11 outlines the breakdown of extant units and permissions to outstanding consents for small sites. When considering the permissions, the settlement groups Linked Settlements and Other Locations are the most likely to become extant (72% and 64% respectively). When considering the units, the settlement group RSC has 67% of the outstanding consents being extant units. Despite this high proportion, RSCs has the lowest number of extant units with 24.

8. Section 6: Short Permissions and Extant Sites

8.1.1 In order to encourage and secure the delivery of housing development, Policy LU05 was created and adopted in LDP 1. This policy states:

**Policy LU05:
Securing the Delivery of Housing Development**

To ensure the genuine availability of land to meet the identified housing number set out in Policy S01 of the LDP:

1. The LPA will, where appropriate, seek a staged release in relation to allocated sites. Applications in relation to allocated sites may therefore initially be granted for a lesser number of units than that which is applied for and/or the overall number of units set out for the site in the Settlement Group Statement. Where appropriate, this approach may also be applied to non-allocated and windfall sites; and
2. Additionally, in relation to Rural Service Centres (RSCs), Linked Settlements and Other Locations:
 - a. Short planning permissions will be issued at the discretion of the LPA;
 - b. Housing development in RSCs may, and in Linked Settlements and Other Locations will, be conditioned with completion dates; and.
 - c. Outline, Reserve Matters and Full consents will not be renewed except with strong justification.

8.1.2 Criterion 1 of the Policy sets out that allocated sites will usually be granted permission in a number of stages. This staged approach is to ensure delivery of housing to meet needs identified by the LDP, this is to ensure where development of that 1st stage does not come forward that delivery on other sites is not impeded by the existing permission. This allows some control in ensuring that the remainder of each site is only permitted as and when the first stage has been significantly completed. This ensures that all permissions do not get tied up on one site which ends up becoming extant and therefore preventing the release of further permissions but at the same time leaving a gap in the actual delivery and provision of housing in that Service Centre. This 'staged' approach will also be applied to non-allocated and windfall sites where appropriate.

8.1.3 The intention of the criterion 2 is not to penalise those with genuine intent to build, nor to create obstacles for larger sites or any other site where

construction complexity or practical difficulties arise which cause unforeseen delay to operations.

- 8.1.4 In the Inspector's Report following Examination of the LDP, the Inspector stated:

“MAC 1/16 revises policy LU05: Securing the Delivery of Housing Development, introducing reference to the application of staged release, where appropriate, to allocated sites. The change also provides additional justification for, and explanation of, the use of shorter planning permissions and completion date conditions. These measures are intended to encourage effective housing delivery and deter “banking” of residential planning permissions in the rural areas. Notwithstanding the general advice concerning conditions requiring completion of development in Circular 35/95, I am satisfied that there is a sufficient planning case for the judicious application of such as measure in the particular circumstances facing rural Ceredigion.”

- 8.1.5 This demonstrates an understanding by the inspector that we have very specific 'rural' problems that are difficult to manage and a new approach is needed to combat these issues. We believe this is as relevant to LDP 2 as it was to LDP 1 and the discounting of some of our extant and outstanding consents is essential for the strategy of LDP2 to be sustainable. Otherwise the split of urban vs rural consents will be skewed in the wrong direction from day 1 with no prospect of correcting itself as occurred in LDP 1.

9. Section 7: Affordable Delivery

9.1.1 This section overviews affordable housing delivery within the county. The first three tables outline the outstanding consents as of April 2018.

Table 12: Total Outstanding consents and number which are Affordable

	Outstanding Consents		Affordable		Break Down %	
	Units	Permissions	Units	Permissions	Units	Permissions
Total	1424	454	333	84	23%	19%

Table 13: Outstanding Affordable by Settlement type (Units) (April 2018)

Settlement Group	Total Outstanding Consents	Affordable	Break Down %
USC	654	172	26%
RSC	275	876	28%
Linked Settlements	311	52	17%
Other Locations	184	33	18%
Total	1424	333	23%

Table 14: Number of outstanding Affordable Units/Consents which are RSL (April 2018)

	Total Affordable	RSL	Break Down %	Non RSL	Break Down %
Units	333	119	36%	214	64%
Permissions	84	7	8%	77	92%

9.1.2 Tables 12, 13 and 14 connect the issue of outstanding consents to the affordable housing delivery. 23% of affordable units and 19% of affordable permissions are outstanding consents. This is in line with the policy

requirement of 20% Affordable Housing. The main issue regarding affordable housing is that 92% of the affordable housing outstanding consents are non RSL permissions (thus individual or developer led affordable which are DFS or IR) since the adoption of the LDP in 2013. Many of these have been granted planning permission for their immediate need which evidently, is not materialising.

- 9.1.3 The AMR notes that at least 20% of all permitted dwellings being affordable. This target has been met with 28% (AMR 2018) of all residential development permitted since plan adoption being affordable. However, this is in part due to the recent developments by RSL's operating in the county.

9.2 Alternatives to Affordable – the commuted sum

- 9.2.1 Policy S05 allows for a commuted sum to be paid in certain circumstances where for example the development is for a site of less than 5 units and or where the affordable housing requirement would equate to a partial unit. Commuted sums are charges to the dwellings via a S106 agreement registered as a land charge, to be paid on first sale or transfer. To April 2018, the Council had secured 48 commuted sums but as they are not paid until first sale or transfer, there is an outstanding value of £564,554. Only £10,000 has been received from the commuted sum payments to date. Options around when Commuted Sums are charged are being considered for LDP 2 in order to ensure that in the next plan period some of these sums are paid more readily, as at present a first sale or transfer policy applies which has resulted in less than 2% of all commuted sums being paid.

10. Section 8: Consents

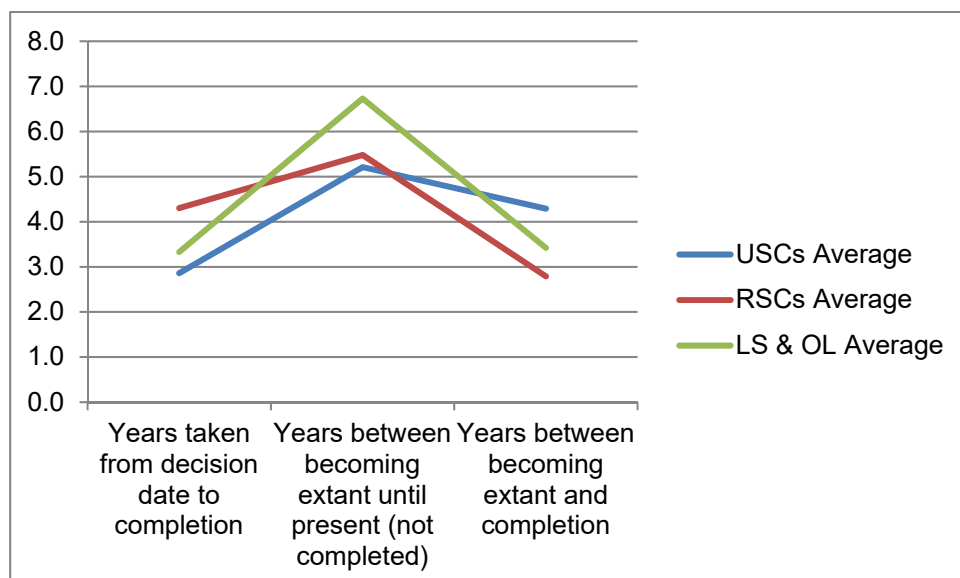


Figure 1: BLPU Tables (BLPU_Applications_approved)(All years are included in these calculations.)

10.1.1 Figure 1 shows that development in USCs is likely to come forward quicker than in RSCs and the LS & OLs. This is to be expected given that sites in USCs are likely to be larger, therefore significant investment will have been made in getting permission and developers will need to see a timely return. However, the reverse is evident for the period between when work on a site is started and completed. Generally it takes approximately 4 years between a site being granted planning permission or being made extant to it being completed. Although the peak in the middle suggests that there are a number of extant sites which have been so for at least 5 years.

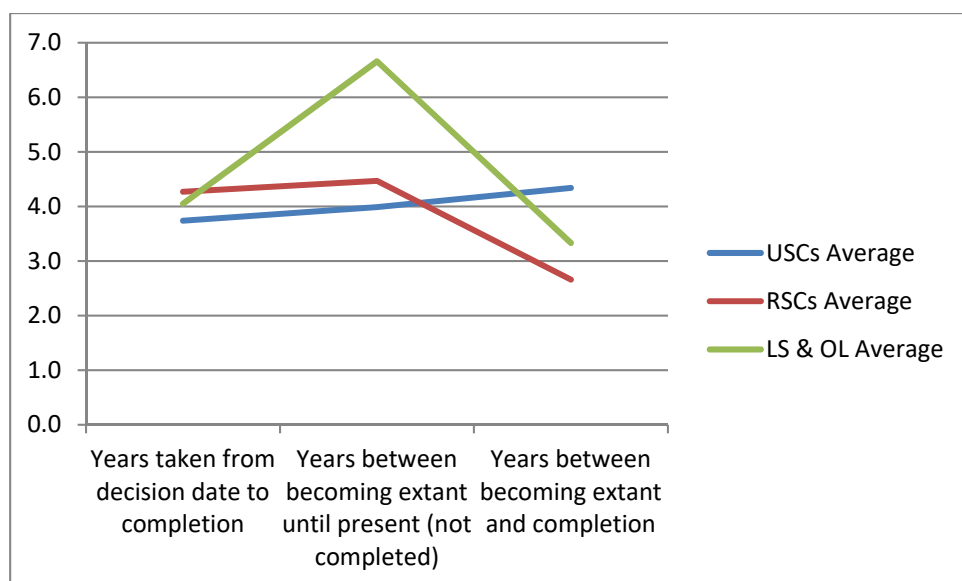


Figure 2: (Extants Further Research)(All years are included in these.)

10.1.2 Figure 2 considers extant sites only. This confirms the trends identified in figure 1 and shows that sites made extant in USCs and RSCs take less time to be completed than in LS & OLs. Mirroring evidence presented in earlier sections demonstrating the specific unique rural problems of Ceredigion where permissions in non-sustainable locations are unlikely to be delivered.

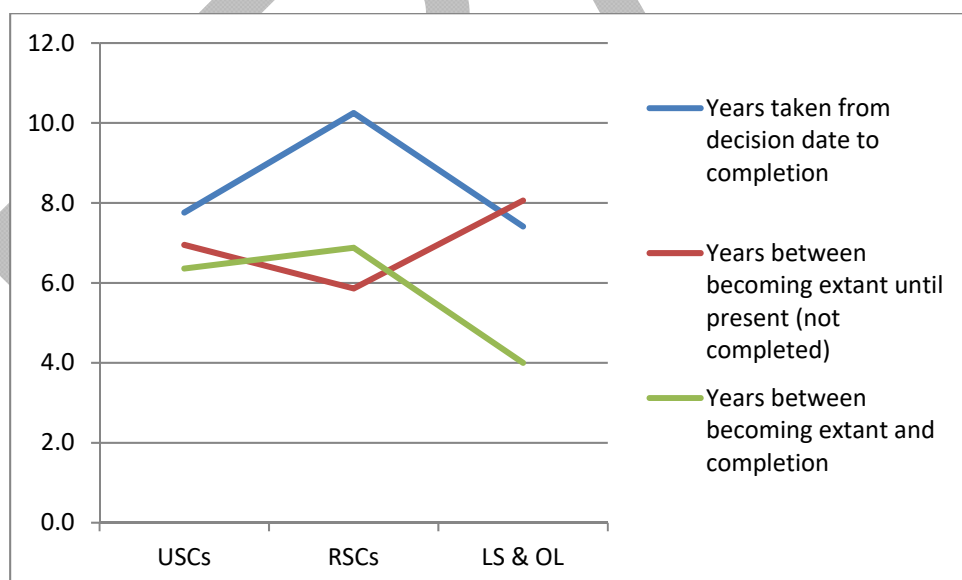


Figure 3: Information Prior to Adoption (This includes only data from prior to adoption of the LDP (April 2013)(Average)

10.1.3 Figure 3 shows that prior to the adoption of LDP1, sites across the locations took longer to complete, mostly in excess of 6 years, and some in RSCs as long at 10 years. This implies that since the adoption of LDP and in particular policy LU05, sites have come forward quicker, demonstrating some successes of the LDP in securing timely delivery of housing.

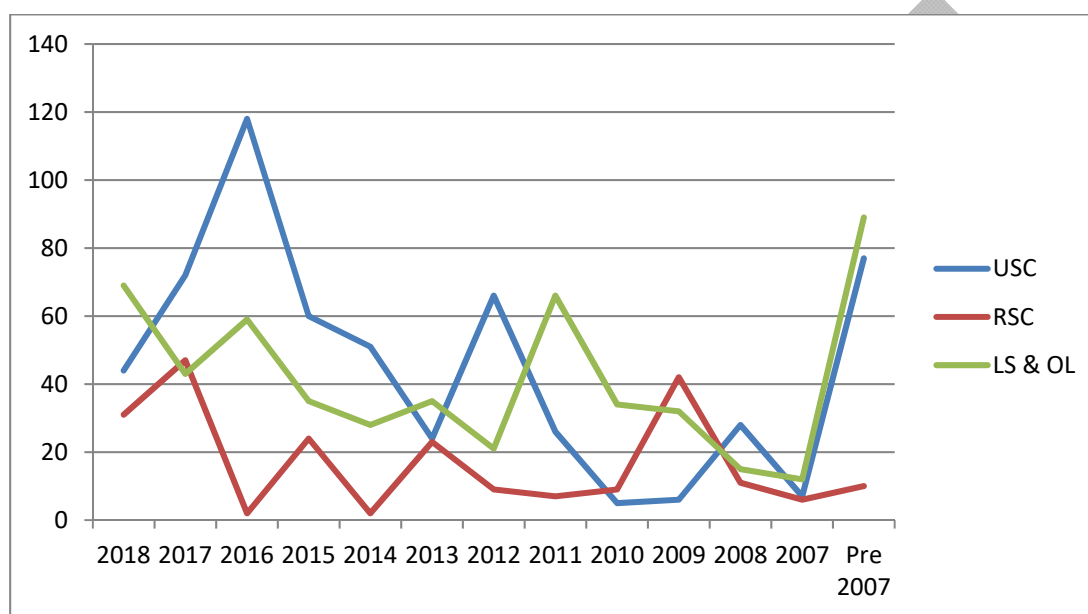


Figure 4: Outstanding Consents by Decision Year

10.1.4 Figure 4 demonstrates a peak in consents in USCs and LS & OL prior to the adoption of the LDP in 2013, and a further peak in 2016 (which coincides with a spike in approvals in USCs specifically Peirce field Lane Aberystwyth and Cylch Caron Tregaron). Consents in RSCs have continued on a steadier trend and haven't exceeded 50 units in any one year.

11. Section 9: Non-delivery Allowance

11.1.1 A non-delivery allowance is a discount that can be applied to the current outstanding consent figure and has been referenced at relevant points of the document however this section addresses the issue specifically. At present, 100% of outstanding consents (1450 units) will be carried forward to the revised plan. However, this would be likely to hinder future development as a large proportion of the housing delivery figure for LDP 2 would be taken up from the outset by a large amount of units that are very unlikely to be completed and are in the least sustainable places contrary to PPW10. Therefore, by applying a non-delivery allowance, the figure that remains is far more realistic and achievable than the current outstanding consents figure, it does not prohibit the development from coming forward as the permissions are not revoked, however it allows a percentage to be discounted from the balance.

11.2 Powys Local Development Plan - Non-delivery allowance to Housing Commitment Sites

11.2.1 First and foremost, Powys County Council's issues in relation to housing delivery slightly differ to the issues here in Ceredigion. However, in evidence prepared for the Powys LDP Examination, Powys County Council has justified a non-delivery reduction in its outstanding consents figure. The methodology applied by Powys County Council is considered below.

11.2.2 Powys County Councils' overall housing supply figure consists of new housing allocations, windfall sites and sites with extant planning permission which they recognise as housing commitments. The table below shows the breakdown of the housing commitment sites:

Table 1: Breakdown of Powys LDP Housing Commitment Sites

		Towns	Large Village	Small Village	Rural / Other	Totals	
A	Total Completions 01/04/2011 – 31/03/2015 – Small and Large Sites	233	154	43	192	622	
B	Appendix 1 Housing Commitment Sites - Units Under Construction	119	37	5	1	162	
C	Housing Commitment Sites – Units Not Started	564	327	103	23	1017	Assumes 100% delivery of HC units
D	Housing Commitment Sites (minus delivery allowance)	338	196	62	14	610	40% non- delivery allowance applied

Source: Powys County Council UDP and development management monitoring and JHLAS (2015)

11.2.3 As the table above shows, a 40% non-delivery allowance has been applied to the Housing Commitment sites that have not been started. However, the non-delivery allowance of 40% was applied to the large sites only. This was due to Powys' main issue with housing delivery being on the large sites rather than the small sites. Following monitoring of the UDP and planning applications and permissions, Powys County Council recognised that it was unrealistic for 100% of the committed sites to be developed. This was due to 38% of the total residential units that were contained within the UDP allocation that had or have had permissions, not being developed. Consequently, 38% was rounded to 40% as the non-delivery figure that takes account of the sites with planning permission but that the monitoring showed will not be developed in the LDP period. Therefore, the total number of housing commitment sites that had planning permission but had not started is 1017 units. However, with a 40% applied, the figure is reduced to 610 units.

11.2.4 With regards to the feedback received on this process, the Inspector was positive and examination papers suggest there was little negative feedback. The Inspector was content that the analysis undertaken by Powys County Council was robust and based on agreed evidence of delivery contained in the Joint Housing Land Availability Study (JHLAS). Consequently, it is seen

as an effective mechanism for ensuring that the Housing Commitments figure is realistic and deliverable.

11.3 Welsh Government emerging Development Plans Manual Edition 3 (draft for informal consultation, October 2018)

11.3.1 The Manual discusses the land bank 'commitments', comprised of housing completions since the start of the LDP period, units that are under construction and those with planning permission at a 'point in time' – the base date.

11.3.2 From this, it states that it may be appropriate to have a 'non-delivery allowance' factored into the land bank which would discount a proportion of the land bank based on local evidence. It also states that this will be most relevant where either a LPA has a large land bank or in areas where the land bank is made up of many small sites that take a long time to complete. As the tables in earlier sections show, this is clearly the issue in Ceredigion and consequently the manual will support a non-delivery allowance in this situation up to the maximum threshold given the scale of the outstanding consents in Ceredigion and their predominance as small sites in locations where development is generally slow to complete.

11.3.3 The Draft Manual outlines the appropriateness of a further non-delivery allowance being factored into the housing land bank, either individually or as a percentage across the overall land bank. It is important therefore to understand the make-up of the proportion of sites that have come forward in the past in order to determine a preferred approach. The latter approach (a percentage discount) is considered to best suit Ceredigion's issues, based on the evidence set out in sections 1-5. The draft Manual further explains that, to date, non-delivery allowances have ranged from 20-50% dependent on local circumstances. Based on the figures presented in this paper, we hope to have a non-delivery allowance of the maximum on the outstanding consents given we have established a significant number are unlikely to come forward in the short to medium term.

11.4 Completions to Consents ratio

11.4.1 The Annual Monitoring Report Indicator AMRH14 looks at the delivery of housing and specifically the consents to completions ratio.

Table 15: Summary of AMRH14 – Housing Delivery

Year	Outstanding Consents on 31/03 of that Year	Completions for that Year	Overall Completions to Consents Ratio
2015	1538	125	1: 12.3
2016	1534	216	1: 7.1
2017	1536	180	1: 8.5
2018	1467	105	1: 14

11.4.2 Table 15 shows that there has consistently been a high completions to consents ratio since plan adoption. Last year was the highest ratio at 14 consents for 1 completion. On average therefore, at least 10 consents must be issues in order to deliver 1 completion which helps to justify a higher than normal flexibility allowance for the next plan period. This would suggest that in order to deliver 3,000 dwellings in the next plan period, the authority would need to issue 30,000 consents (a highly unlikely scenario given the types and scale of development that comes forward in Ceredigion).

11.4.3 However, the plan proposes a flexibility allowance of 25%. This takes into account the carrying forward of a proportion of the outstanding consents and extant units.

12. Discounting Options Ceredigion could Pursue

12.1 Option 1 – The Members preferred discount scenario:

- Of the **1450** Outstanding Consents units, there are **783** extant units.
- **579** of these were granted over 5 years ago and therefore, the likelihood of them not being completed is high.
- For this reason, we wish to **deduct 579** extant units from the figure carried forward.
- **204** units remain extant (granted 5 years ago or since).
- Therefore, to create a realistic figure, we wish to **deduct 50%** from the remaining **204** extant units along with the remaining **667** outstanding consents.
- $667 + 204 = 871$
- $50\% \text{ of } 871 = 436$
- Therefore, $579 + 436 = 1015$

12.1.1 The amount of units we wish to discount is a total of 1015 which would leave us with $(1450-1015=)$ **435 units** to be carried forward to the housing figure for the revised plan under the members preferred scenario.

12.1.2 The above calculation discusses the Members' most favourable discounting for the non-delivery allowance. It acknowledges that 783 units of the 1450 outstanding consents are extant. From the 783 extant units, 579 were granted over 5 years ago and therefore, are of considerable age which our evidence suggest are the least likely to be delivered. The main issue regarding these are that they were granted under a very different planning regime and consequently were not permitted under the adopted LDP. For this reason, we do not wish to carry forward any of the 579 units and want to discount 100% of these. This would allow Ceredigion County Council to have a 'clean slate' and to concentrate on the units and permissions granted since adoption of LDP 1 in 2013.

12.1.3 There are a remaining 204 extant units that have been granted since April 2013 along with the remaining outstanding consents which equates to 667 units. This gives a remaining total of 871 units. Due to the limited chance of a large proportion of these not being completed, a discount of 50% would be applied. This would discount a further 436 units.

12.1.4 Therefore in total, 1015 units would be discounted, which would leave a realistic and deliverable figure of 435 units to be carried forward from LDP 1 to the housing figure of the revised Plan.

12.1.5 **Member preferred scenario carry forward figure: 435**

12.2 Option 2 percentage of extant permissions discount scenario:

- There are **454** Outstanding Consent permissions of the total 1450 (the remainder being extant).
- We apply an overall discount of **63%** on this figure. (The 63% represent the extant permissions of outstanding consents).
- 63% of 1450 = **914**.
- 1450 – 914 = **536**.

12.2.1 Therefore, we carry **536 units** forward to the housing figure for the revised plan.

12.2.2 Option 2 discusses applying an overall discount to the outstanding consents figure based on the evidence provided in this paper. With 454 outstanding consent permission, 284 are extant (table 9). Therefore, $(284/454 \times 100 =)$ 63% of the outstanding consents are extant. Consequently, the likelihood of these being completed is low. For this reason, an overall non-delivery allowance of 63% is to be applied on the overall figure.

12.2.3 Due to the housing figure being in units, 63% will be deducted from the 1450 which equals 914 units. With 914 units being discounted, 536 units remain and are to be carried forward to the revised Plan.

12.2.4 **Extant permissions Discount Scenario carry forward figure: 536**

12.3 Option 3 extant units discount scenario:

- There are **1450** Outstanding Consents units.
- We apply an overall discount of **54%** on this figure. (The 54% represent the extant units of outstanding consents).
- 54% of 1450 = **783**.
- 1450 – 783 = **667**.

12.3.1 Therefore, we carry **667 units** forward to the housing figure for the revised plan.

12.3.2 This option is of the same approach as Option 2, which is to apply an overall discount to the outstanding consent figure. With 1450 outstanding consents in the County, 783 of the units are extant (table 4). This equates to 54% of the outstanding consents being extant. Consequently, an overall discount of 54% is to be applied on to the outstanding consent unit figure.

12.3.3 This would discount 783 units and allow 667 units to be carried forward to the housing figure of LDP 2.

12.3.4 **Extant Units Discount Scenario carry forward figure: 667**

Table 16: Summary of Discounting Options

Option 1		Option 2		Option 3	
Total Outstanding Consent Units	1450	Total Outstanding Consent Permissions	454	Total Outstanding Consent Units	1450
Total Extant Units	783	Total Extant Permissions	284	Total Extant Units	783
Extant Units >5years	579	% of Outstanding Consent Permissions Extant	$284/454 \times 100 = 63\%$	% of Outstanding Consents Extant	$783/1450 \times 100 = 54\%$
Outstanding Consent Units (not extant)	667	63% of Outstanding Consent Units	$1450/100 \times 63 = 914$	Outstanding consents – Extant Units	$1450 - 783 = 667$
Extant Units <5years	204	63% of Outstanding Consent Units from Total Outstanding Consent Units	$1450 - 914 = 536$		
50% of Outstanding Consents + Extant Units <5years	$667 + 204 = 871/2 = 436$ $579 + 436 = 1015$				
Outstanding consents - 50% of Outstanding Consents + Extant Units <5years	$1450 - 1015 = 435$				
Carry Forward	435	Carry Forward	536	Carry Forward	667

12.3.5 Table 16 summarises the options considered for discounting the number of units to be carried forward into the next plan period. The calculations show that a significant number of the outstanding consents are extant, and the majority of those were made extant more than 5 years ago. There could be a host of reasons for the delay in units being built out, but given that these units were not permitted in the LDP1 period, it is not considered necessary to carry them forward into the next plan period. Having considered the three options, none of the options providing a one size fits all approach it is considered reasonable to only carry forward 600 units into the next plan period 2018-2033 which is a figure that is broadly supported by all of the methodologies.

13. Section 10: Conclusion and Recommendations

13.1.1 To conclude, it is evident that Ceredigion has a significant number of outstanding consents, many of which are extant and it is expected that many will not come forward given their age and location.

13.1.2 Poor housing delivery is a national issue and not confined either to rural areas or to Ceredigion. There are problems with the market, beyond the remit of planning interventions. It is recognised that weak demand can have a disproportionate impact on small developers' cash flow and turnover and a lack of finance. On its own, planning cannot solve the issue of the demand side being weak. This can only be addressed by concerted and collaborative efforts to strengthen and regenerate the wider economy (nationally and locally) in order to overcome the major economic factors that impact on market confidence and, as such, are a barrier to implementation.

13.1.3 This is an issue that needs careful consideration within the preparation of the replacement Plan. As demonstrated in the Review Report the projected need of the current LDP was clearly unrealistically high and the current projected need will be considerably less. With nearly 1500 outstanding consents in the County, these naturally would be carried forward as part of the replacement Plan housing target. This paper has demonstrated that a large proportion of the outstanding consents are extremely unlikely to come forward and to be completed. Unadjusted for non-delivery this figure could hinder future development as it instantly reduces the component of the landbank comprising of allocations and impacts on the numbers of homes that could be granted and implemented. And contrary to the place making outcomes of PPW will unduly direct development to the (in the case of 70% of them) to the least sustainable places in the county.

13.1.4 Drawing on the evidence in section 3, setting out what permissions do come forward and in what locations, it is clear that applications in the USCs and RSCs are far more likely to come forward for development than those in the Linked Settlements and Other Locations. Permissions in the USCs are less

likely to become extant than those in the Linked Settlements and Other Locations. In particular, permission for individual or small sites in Linked Settlements and Other Locations are the most likely to become extant and therefore, are not servicing the 'immediate need' they are permitted for. An issue that is being addressed through the evidencing of need and the use of short consents and completion conditions as set out in policy LU05.

13.1.5 This issue is especially highlighted in the Linked Settlements as many have reached or exceeded their capacity of 12% growth (on paper but not in actual completed units). No further growth is supported in LDP 2 in non-sustainable Linked Settlements as we recognise the amount of outstanding consents that exist and the opportunity this affords, thus discounting some of this 'imaginary' landbank will not facilitate further growth in these settlements.

13.1.6 For these reasons, and drawing on the proposals within Welsh Government's emerging LDP Manual and the experience of other Local Authorities, application of a non-delivery allowance would secure a better relationship between the housing land bank for the replacement plan and housing delivery. It would also ensure that the growth projected for the county is directed to the most sustainable locations rather than stifling further growth and thereby possibly 'pushing market demand' for the development of permissions in non-sustainable locations that would otherwise lapse.

13.1.7 Given the limitation of Planning in addressing housing delivery the following recommendations are proposed for the replacement Plan, in order to improve housing delivery in Ceredigion:

1. To apply a non-delivery allowance of the maximum on the outstanding consents to provide a sound basis for the housing land bank for the replacement Plan.
2. To direct its resources to supporting and approving development in the service centres, given the greater likelihood of achieving completions where there is the best proposed of permissions approved being implemented.

3. To limit the impact of future extant consents by carrying forward policy LU05 into the replacement Plan, to ensure that for any units approved in all locations:
 - a. Justified documentary evidence is submitted in support of the application that there is an identified immediate need that cannot be met elsewhere; this will require training for officers as well as members of planning committee.
 - b. A short permission (short start/short completion) is conditioned and both agent and applicant are made aware that a renewal of the application is not possible unless under exceptional circumstances.

13.1.8 Ceredigion's lack of housing delivery is not specific to Ceredigion nor to rural areas, it is a national issue. There is evidently a problem with the market, which unfortunately planning cannot solve. The lack of demand can cause a consequent impact on small developers as the lack of demand in the market affects the developers' cash flow and turnover and because of weak demand, there is a lack of availability of finance. Planning cannot solve the issue of the demand side being weak. This is due to the wider economy also being weak with the highest real interest rates for decades, a disastrous balance of payments deficit, low investment and a ballooning national debt. This is alongside huge levels of personal debt. However, none of this again is a planning issue.

13.1.9 Given the information above and the situation it presents in the development industry locally and nationally, we need to consider what we as a County can do. Firstly, we need to ensure that the permissions we approve will come forward and this report supports us in determining what permissions do come forward and in what locations. It is clear that applications in the USCs and RSCs are far more likely to come forward for development than those in the Linked Settlements and Other Locations. Permissions in the USCs and RSCs are much less likely to be extant than those in the Linked Settlements and Other Locations. In particular, permission for individual or small sites in Linked Settlements and Other Locations are the most likely to become

extant and therefore, are not servicing the 'immediate need' they are permitted for (post 2013). Consequently, we should direct our resources to supporting and approving development in the service centres which has the best overall chance of becoming a completed unit. We should also ensure that if we do permit a unit, especially an affordable unit in the Linked Settlements or Other Locations it has a short permission and the applicant is made aware that a renewal of the application is not possible. Also, to support granting an application in these locations, we should have justified documentary evidence that there is an identified immediate need that cannot be met elsewhere.

13.1.10 It can sometimes be unclear as to what powers the Local Planning Authority has with regards to extant sites. The Town and Country Planning Act is clear that if a developer has made a material start and satisfied all pre-commencement conditions then that permission is extant. There are legal mechanisms that we can use to 'encourage' development such as a completion notice. However, the use of this has been extremely rare across England and Wales with only 30 uses in over 30 years. They are uncommonly used as they are widely recognised as unfit for purpose, costly and burdensome on the local authority and ultimately unsuccessful in succeeding to provide completed development. Therefore, it is more important to ensure that the right kind of development is permitted in the right places in order to get units completed. This again is recognised as a national problem and is not specific to Ceredigion.

13.1.11 The projected need of the current LDP was clearly unrealistically high and the current projected need will be considerably less. With nearly 1500 outstanding consents in the County, these naturally would be carried forward to the next LDPs' housing target. However, what this report has shown is that a large proportion of the outstanding consents are extremely unlikely to come forward. Therefore, this figure could hinder future development as it instantly reduces the amount of homes that can be granted and completed. This issue is especially highlighted in the Linked Settlements as many have reached or exceeded their capacity of 12% growth (on paper but not in

actual completed units). For this reason, with the support of Welsh Government in the Draft LDP Manual and through the experience of other Local Authorities, we intend to discount the current outstanding consents figure and to only carry forward approximately 600 units into the next plan period which will be accommodated within the plans flexibility allowance and ensure that the majority of growth in LDP 2 is actually likely to come forward and do so in the most sustainable locations.

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Appendix 1

Report on LDP Housing Commitments at 30/04/2018: Monitoring the Ceredigion Local Development Plan (LDP 2007 – 2022)

LDP Housing Commitments as of 30/04/2018

Table 1: Overview of Ceredigion Commitments

**Column d: This shows 2007 housing stock that has been removed from being available as a result of planning permission being granted for either demolition or conversion to another use from 2007 onwards. Loss of units is expressed as a negative in column (d), showing that units have been lost from the stock e.g. -2 means that two units have been converted to non-residential uses).*

***Column e: This Remaining requirement includes an allowance for the number of units lost from the pre 2007 housing stock as a result of planning permission for demolition or change of use granted from 2007 onwards. In these cases columns (b) + (c) + (d) will not tally to the number given in column (a)*

(a) Cyfanswm Gofyniad (SEFYDLOG) (a) Total Requirement (FIXED)	(b) Unedau a gwblhawyd (01/04/2007 - 31/03/2018) (b) Completions (01/04/2007 - 31/03/2018)	(c) Caniatadau sy'n sefyll ar 30/04/2018 (c) Outstanding Consent at 30/04/2018	(d) *Dymchweliadau a Thrawsnewidiadau'n arwain at angen ychwanegol am dai (01/04/2007 - 31/03/2018) (d) *Demolitions and Conversions leading to extra need for housing (01/04/2007 - 31/03/2018)	(e) Gofyniad sydd ar ôl (a-(b+c+d)) (e) Remaining Requirement (a-(b+c+d))	(f) Newid yn y gofyniad sydd ar ôl ers yr adroddiad blaenorol (31/12/2017) (f) Change in Remaining Requirement from previous report (31/12/2018)
6000	2044	1467	-118	2607	43

Table 2: The Distribution Ceredigion Commitments

Cyfanswm yr Ymrwymadau ar 30/04/2018 <i>Total</i> <i>Commitments at 30/04/2018</i>						
	Cwblhawyd Completions	Dadansoddiad % % Break Down	Caniatadau sy'n sefyll Outstanding Consents	Dadansoddiad % % Break Down	Cyfanswm yr Ymrwymadau Total Commitments	Dadansoddiad % % Break Down
CGT USC	874	43	656	45	1530	44
CGG RSC	290	14	292	20	582	17
Lleoliadau Eraill LS and OL	880	43	519	35	1399	40
Cyfanswm Total	2044	100	1467	100	3511	100

Table 4: Details of Commitments for the 22 Settlement Groups

Column d: This shows 2007 housing stock that has been removed from being available as a result of planning permission being granted for either demolition or conversion to another use from 2007 onwards. Loss of units is expressed as a negative in column (d), showing that units have been lost from the stock e.g. -2 means that two units have been converted to non-residential uses).

**Column e: This Remaining requirement includes an allowance for the number of units lost from the pre 2007 housing stock as a result of planning permission for demolition or change of use granted from 2007 onwards. In these cases columns (b) + (c) + (d) will not tally to the number given in column (a).

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Grŵp Aneddiadau <i>Settlement Group</i>			(a) Cyfanswm Gofyniad (SEFYDLOG) <i>(a) Total Requirement (FIXED)</i>	(b) Unedau a gwblhawyd (01/04/2007 - 31/03/2018) <i>(b) Completions (01/04/2007 - 31/03/2018)</i>	(c) Caniatadau sy'n sefyll ar 30/04/2018 <i>(c) Outstanding Consent at 30/04/2018</i>	(d) *Dymchweliadau a Thrawsnewidiadau'n arwain at angen ychwanegol am dai (01/04/2007 - 31/03/2018) (d) *Demolitions and Conversions leading to extra need for housing (01/04/2007 - 31/03/2018)	(e) Gofyniad sydd ar ôl (a(b+c+d)) <i>(e) Remaining Requirement (a-(b+c+d))</i>	(f) Newid yn y gofyniad sydd ar ôl ers yr adroddiad blaenorol 31/12/2017 <i>(f) Change in Remaining Requirement from previous report 31/12/2017</i>
1	Aberaeron (Llwyncelyn)	Grŵp Aneddiadau Settlement Group	197	87	62	-2	50	-5

		Canolfan Gwasanaethau Service Centre	131	41	28	-1	63	0
		Lleoliadau Eraill Other Locations	66	46	34	-1	-13	-5
2	Aberteifi Cardigan	Grŵp Aneddiadau Settlement Group	564	339	138	-16	103	0
		Canolfan Gwasanaethau Service Centre	420	268	81	-14	85	1
		Lleoliadau Eraill Other Locations	144	71	57	-2	18	-1
3	Aberystwyth, Llanbadarn Fawr, Penparcau, Waun Fawr	Grŵp Aneddiadau Settlement Group	2058	564	297	-75	1272	55
		Canolfan Gwasanaethau Service Centre	1877	470	254	-68	1221	58
		Lleoliadau Eraill Other Locations	181	94	43	-7	51	-3
4	Castell Newydd Emlyn (Adpar) Newcastle Emlyn	Grŵp Aneddiadau Settlement Group	142	77	51	-5	19	1

	(Adpar)	Canolfan Gwasanaethau Service Centre	54	18	19	-3	20	0
		Lleoliadau Eraill Other Locations	88	59	32	-2	-1	1
5	Llanbedr Pont Steffan Lampeter	Grŵp Aneddiadau Settlement Group	352	121	125	-7	113	1
		Canolfan Gwasanaethau Service Centre	231	49	92	-5	95	1
		Lleoliadau Eraill Other Locations	121	72	33	-2	18	0
6	Llandysul	Grŵp Aneddiadau Settlement Group	442	127	181	-2	136	-1
		Canolfan Gwasanaethau Service Centre	226	5	100	0	121	1
		Lleoliadau Eraill Other Locations	216	122	81	-2	15	-2
7	Tregaron	Grŵp Aneddiadau Settlement Group	176	59	101	0	16	0

		Canolfan Gwasanaethau Service Centre	102	23	82	0	-3	0
		Lleoliadau Eraill Other Locations	74	36	19	0	19	0
8	Aberporth / Parcllyn	Grŵp Aneddiadau Settlement Group	332	104	86	-2	144	-5
		Canolfan Gwasanaethau Service Centre	220	35	41	-2	146	0
		Lleoliadau Eraill Other Locations	112	69	45	0	-2	-5
9	Bow Street	Grŵp Aneddiadau Settlement Group	119	44	15	0	60	0
		Canolfan Gwasanaethau Service Centre	100	33	2	0	65	0
		Lleoliadau Eraill Other Locations	19	11	13	0	-5	0
10	Ceinewydd New Quay	Grŵp Aneddiadau Settlement Group	233	87	35	-2	113	0

		Canolfan Gwasanaethau Service Centre	151	34	16	-2	103	0
		Lleoliadau Eraill Other Locations	82	53	19	0	10	0
11	Cenarth	Grŵp Aeddiadau Settlement Group	65	18	28	0	19	-1
		Canolfan Gwasanaethau Service Centre	49	6	19	0	24	0
		Lleoliadau Eraill Other Locations	16	12	9	0	-5	-1
12	Felinfach / Ystrad Aeron	Grŵp Aeddiadau Settlement Group	177	73	25	-1	80	0
		Canolfan Gwasanaethau Service Centre	112	27	5	0	80	0
		Lleoliadau Eraill Other Locations	65	46	20	-1	0	0
13	Llanarth	Grŵp Aeddiadau Settlement Group	115	43	55	-1	18	-1

		Canolfan Gwasanaethau Service Centre	77	14	38	-1	26	0
		Lleoliadau Eraill Other Locations	38	29	17	0	-8	-1
14	Llanilar	Grŵp Aneddiadau Settlement Group	179	40	55	0	84	0
		Canolfan Gwasanaethau Service Centre	125	6	43	0	76	0
		Lleoliadau Eraill Other Locations	54	34	12	0	8	0
15	Llanon	Grŵp Aneddiadau Settlement Group	147	83	25	-2	41	0
		Canolfan Gwasanaethau Service Centre	108	52	10	-1	47	0
		Lleoliadau Eraill Other Locations	39	31	15	-1	-6	0
16	Llanrhystud	Grŵp Aneddiadau Settlement Group	123	47	25	0	51	0

		Canolfan Gwasanaethau Service Centre	97	29	18	0	50	0
		Lleoliadau Eraill Other Locations	26	18	7	0	1	0
17	Llanybydder	Grŵp Aneddiadau Settlement Group	23	8	2	-1	14	0
		Canolfan Gwasanaethau Service Centre	14	0	0	0	14	0
		Lleoliadau Eraill Other Locations	9	8	2	-1	0	0
18	Penrhyncoch	Grŵp Aneddiadau Settlement Group	120	35	93	0	-8	0
		Canolfan Gwasanaethau Service Centre	105	28	90	0	-13	0
		Lleoliadau Eraill Other Locations	15	7	3	0	5	0
19	Pontarfynach Devil's Bridge	Grŵp Aneddiadau Settlement Group	102	24	24	0	54	0

		Canolfan Gwasanaethau Service Centre	47	0	0	0	47	0
		Lleoliadau Eraill Other Locations	55	24	24	0	7	0
20	Pontrhydfendigaid	Grŵp Aneddiadau Settlement Group	114	29	19	-1	67	-1
		Canolfan Gwasanaethau Service Centre	73	9	7	0	57	0
		Lleoliadau Eraill Other Locations	41	20	12	-1	10	-1
21	Talybont	Grŵp Aneddiadau Settlement Group	131	21	21	0	89	0
		Canolfan Gwasanaethau Service Centre	84	8	3	0	73	0
		Lleoliadau Eraill Other Locations	47	13	18	0	16	0
22	Y Borth Borth	Grŵp Aneddiadau Settlement Group	89	14	4	-1	72	0

	Canolfan Gwasanaethau Service Centre	75	9	0	0	66	0
	Lleoliadau Eraill Other Locations	14	5	4	-1	6	0

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