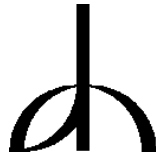


**Council references: 2438
2634
2636
4119**



**Caerphilly County Borough
Local Development Plan Examination**

Hearing Session 2: Housing Provision

**Submissions on behalf of:
Trustees of the Llancaiach Estate
Rhondda Development Company Limited
Mr V Perry, and
Mr M Lewis**

**4922/4810/4354/
5069/4573
ARM/LEM
Harmers Limited
March 2010**

**Harmers Limited
39 Lambourne Crescent
Cardiff Business Park
Llanishen
Cardiff
CF14 5GG
Tel No: 029 2076 5454
Fax No: 029 2076 1536
Email: harmers@btconnect.com
Website: www.harmers.biz**

Hearing Session 2: Housing Provision

Issues and matters

Is the moderate growth strategy sound?

- Is the Plan's adoption of a moderate growth strategy figure of 8625 units justified?
- Is there a robust rationale for this in the light of
 - (i) recent population trends,
 - (ii) the SEWSPG apportionment exercise,
 - (iii) the WAG 2006 – based household projections?

The moderate growth is not sound because the Council has not provided sufficient and adequate evidence to justify departing from the SEWSPG housing apportionment exercise and the latest WAG population and household projections.

Planning Policy Wales is quite clear in that the latest Assembly Government and National Household Projections for Wales should form the starting point for assessing housing requirements and where local planning authorities seek to deviate from the WAG projections they must justify the reasons for so doing and explain the rationale behind their own preferred projections. In adopting the moderate growth strategy the Council has not provided the justification for deviating from the WAG projections. When the plan was placed on deposit in October 2008 objection was made to Policy SP16 and the housing requirement figure of 8625 dwellings on the basis that the housing requirement was not in accordance with the SEWSPG apportionment exercise and the latest WAG population projections which were published in June 2008.

The Population and Housing Background Paper 6, although dated October 2008, appears to have been produced prior to the publication of the 2006 based Population Projections in June 2008 and does not provide any justification for deviating from the WAG population projections. Paragraphs 4.5.12- 4.5.14 of the Background Paper recognises that the moderate growth strategy is lower than the regional apportionment exercise but provides no justification for the deviation. The document states the following:-

- As the housing requirement is 88% of the SEWSPG figure then it is substantially met- however no explanation is given to justify the 12% reduction.
- The housing land provision is greater than the dwelling requirement therefore providing flexibility in the land supply to accommodate the SEWSPG figure should growth be higher- this is a different issue and does not justify adopting a lower housing requirement.
- Reference is made to a review of the plan in four years. The test of soundness CE2 is that the plan has to be founded on a robust and credible evidence base which is available at the time of plan preparation. It is not acceptable to ignore the available evidence and rely on a plan review.
- The document speculates that the 2006 – based projections are unlikely to differ significantly from the moderate growth option which has not proved to be the case.

The latest 2006 based household projections were published on the 11th June 2009 prior to the submission of the LDP for Examination and document ED 13 aims to provide the evidence to indicate why the publication of the latest WAG population and household projections do not require any amendments to the Deposit LDP.

The paper includes a comparison between the Deposit Plan Population projections and the WAG 2006 Population projections. The Deposit plan projections assume a higher level of net immigration than the WAG projections and the main reason for the difference between the two projections is due to the level of natural change. The paper claims (para 2.26) that the higher level of natural change assumed in the WAG projections may not be realised due to the changing economic circumstances. However there is no evidence to support this view and the revised 2008 mid year estimates indicate that the actual increase in population has been higher than the WAG 2006 projections. Para 4.3 of ED13 states that the Moderate Growth Projection of natural increase of 246 persons per annum is consistent with past long-term trends. However over the longer term period 1981-2006 the population of Caerphilly has remained constant, and in a period where growth is projected, it is inevitable that there will be an increase in natural change, particularly where net immigration is assumed to be fairly low. If the Council were to rely on long term trends to determine the future population then this would indicate a continuation of a constant level of population.

Para 4.8 of ED 13 states that the moderate growth strategy was derived from having regard to the SEWSPG apportionment figure yet no explanation is given as to why the LDP dwelling requirement is some 1125 lower than the SEWSPG figure.

Para 5.4 of ED 13 refers to WAG guidance on late evidence in the LDP Manual (para 7.6.2 refers). However, the publication of the WAG Population Projections before the Deposit Plan or the WAG Household Projections before the submission of the LDP cannot be considered as late evidence. In order for the plan to be sound the Council has to justify deviating from the latest WAG projections and they have failed to do so.

With regard to section 6 of ED13 it is not acceptable to defer the matter to the First Review of the LDP. As section 5 of the Paper acknowledges, if the dwelling requirement is based on the latest household projections, this would require a major change to the LDP and in order to meet the test of soundness, this is a matter that needs to be addressed now rather than at First Review.

Is the overall level of provision for housing over the Plan period acceptable?

The Council accept in principle that there should be an allowance for choice and flexibility, which on the basis of the calculation in Table 8 Housing Land Supply Supplementary Paper is 25.8%. This is considered to be acceptable and should be incorporated into the revised housing land supply to meet a higher housing requirement.

With regard to land supply we are concerned that many of the allocated sites will not come forward as anticipated in the plan period and we are not aware of the Council carrying out a robust assessment of the availability and deliverability of the allocated sites.

Is the spatial distribution of new housing opportunities across the County Borough acceptable?

It is considered that the under allocation of housing sites within the NCC, compared with the other two areas, is not in conformity with the Preferred Strategy (para 6.21 refers).

Is the balance of reliance on brownfield land versus greenfield sites acceptable?

There is a requirement to allocate additional greenfield sites in the NCC and HOVRA in order to provide a better range and choice of housing which will enable the LDP strategy of encouraging growth in these areas to be achieved.