

CAERPHILLY COUNTY BOROUGH DEPOSIT LOCAL DEVELOPMENT PLAN UP TO 2021: COUNCIL CONSIDERATION OF REPRESENTATIONS (FOCUSED CHANGES)

1 INTRODUCTION

1.1 In September 2009 the Council resolved that a six-week public consultation exercise take place in respect of the Focused Changes to the Deposit Local Development Plan arising as a result of the Council consideration of the representations at the Council meeting on the 15th September 2009.

1.2 Consultation on the Focused Changes commenced on September 23rd and concluded on the 4th November 2009. Altogether 122 representations were received to the Focused Changes from organisations, bodies and individuals, comprising 8 representations of support, 36 representations of objection, and 66 representations containing comments. 12 representations were not duly made as they were submitted after the consultation deadline or did not relate to a focused change. .

1.3 In order for the Planning Inspector to have regard for the Council's consideration of these representations a summary of all of the duly made representations together with an Officer Analysis and Officer Recommendation in respect of each is contained in this report.

2 MAIN AREAS OF CONCERN

2.1 The representations received in respect of the Focused Changes relate mainly to the following areas:

- Concerns related to the Viability Assessment undertaken by the Council resulting in the focused changes to the Affordable Housing Target for the plan;
- The Cumulative impact of the housing site deletions and the impact on the housing land supply;
- Landowners suggesting that as a consequence of the deletion of housing sites from the Deposit LDP, alternative sites should be included to compensate for the loss of housing land;
- Site Specific Focused Changes that threaten the soundness of the Deposit LDP.

Viability Assessment

2.2 In general the main concerns raised in respect of the Viability Assessment relate to the perceived lack of involvement of the development industry in terms of the preparation of the study. As a consequence the Home Builders Federation have therefore challenged the assumptions that have been used in the study which underpin the targets for affordable housing contained in the Focused Changes.

2.3 In addition the Welsh Assembly Government commented that they were unclear if the Affordable Housing Target had regard for the Focused Changes (refer to Annex A)

Cumulative Impact of deletions on Housing land Supply

2.4 The deletion of a number of housing allocations as a result of the Focused Changes has led a number of representators to press for the reconsideration of sites that they had already unsuccessfully promoted during the Plan preparation process. Each of them has argued that the cumulative impact of the deletion of the housing sites referred to in the Focused Change document will result in over 800 dwellings being removed from the Plan without any new proposals to compensate for the loss of these development opportunities. They argue that this will result in a reduced overall provision to some 7,800 dwellings, which even with a flexibility allowance will only increase provision to 9,600. They further note that this is far below the new household requirement for Caerphilly of 11,300 identified in the Welsh Assembly Government's Household Projections for Wales (2006-based) published in June 2009.

2.5 Annex A to this Appendix provides details in terms of the cumulative impact of the focused changes on the total housing land supply figure. It should be noted that the land supply figure would still equate to 10,045 dwellings, which is above the housing requirement figure identified in the Deposit LDP of 8625 dwellings and also higher than the SEWSPG apportionment figure of 9,750 dwellings.

2.6 With regard to the reference to the 2006 Household Projections this matter has been dealt with previously by Council in its consideration of *BP6 Supplementary Paper 1: WAG 2006 Based Population & Household Projections*.

Alternative Sites

2.7 As indicated a number of landowners suggest that as a consequence of the deletion of housing sites from the Deposit LDP, there is insufficient land for housing and that alternative sites should be included in the plan to compensate for this loss of housing land throughout the county borough. To avoid repetition throughout the remainder of the report the following paragraphs summarise the detailed points made by the representators for each site promoted.

- **Valley View, Cefn Hengoed**

The officer assessment of the site which is being promoted at Valley View, Cefn Hengoed is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough. This is particularly relevant in the Southern Connections Corridor as, a year on from the publication of the Deposit Plan, there is no further evidence to demonstrate that the proposed Bedwas Colliery scheme, for which provision is made for 630 units, can be delivered within the Plan Period.

- **Caerphilly Road, Ystrad Mynach**

The officer assessment of the site which is being promoted at Caerphilly Road, Ystrad Mynach is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough. This is particularly relevant in view of the site being promoted, which is effectively underused brownfield land in a sustainable location.

- **Croespenmaen Industrial Estate**

The officer assessment of the site which is being promoted at Croespenmaen Industrial Estate is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough. This is particularly relevant in view of the site being promoted, which when redeveloped will improve conditions for existing residents in the area.

- **Pen y Cwarel Road, Wyllie**

The officer assessment of the site which is being promoted at Pen y Cwarel Road, Wyllie, as an extension to the existing allocated site, is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough. This is particularly relevant in the Southern Connections Corridor as, a year on from the publication of the Deposit Plan, there is no further evidence to demonstrate that the proposed Bedwas Colliery scheme can be delivered within the Plan Period.

- **Southend Terrace, Pontlottyn**

In particular the deletion of the Aberbargoed Tips site (FC 04) will have implications on Strategy delivery in the Heads of the Valley area. This is acknowledged by the Council in the Re-Assessment of the Site in view of its proposed removal. Nevertheless the conclusion does not go as far as stating that it renders the Plan unsound. This is disputed as one of the Key components of the LDP Strategy is to "Allow for development opportunities in the Heads of the Valleys Area." The officer assessment of the site which is being promoted at Southend Terrace, Pontlottyn is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough as a whole and the Heads of the Valleys area in particular.

- **Ty Du Farm, Nelson**

The officer assessment of the site which is being promoted at Ty Du Farm, Nelson is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough. This is particularly relevant as, a year on from the publication of the Deposit Plan, there is no further evidence to demonstrate that the proposed Bedwas Colliery scheme can be delivered within the Plan Period.

- **North of Westhaven, Caerphilly**

The officer assessment of the site which is being promoted at North of Westhaven, Caerphilly is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough or the topography of the site. This is particularly relevant in the Caerphilly area as, a year on from the publication of the Deposit Plan, there is no further evidence to demonstrate that the proposed Bedwas Colliery Scheme can be delivered within the plan period.

- **Van Road, Caerphilly**

The officer assessment of the site which is being promoted at Van Road, Caerphilly is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough. This is particularly relevant in the Caerphilly area as, a year on from the publication of the Deposit Plan, there is no further evidence to demonstrate that the proposed Bedwas Colliery Scheme can be delivered within the plan period.

- **Tyle Gwyn, Wyllie**

The officer assessment of the site which is being promoted at Tyle Gwyn, Wyllie, as an urban extension to the Blackwood / Pontllanfraith urban area in conjunction with other land to the north, is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough.

- **Pengam Road, Ystrad Mynach**

The officer assessment of the site which is being promoted at Pengam Road, Ystrad Mynach, is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough or the topography of the site. This is particularly relevant in the Caerphilly area as, a year on from the publication of the Deposit Plan, there is no further evidence to demonstrate that the proposed Bedwas Colliery Scheme can be delivered within the plan period.

- **Extension to The Glade, former Wyllie Colliery**

The officer assessment of the site which is being promoted at the former Wyllie, as an extension to the existing The Glade development is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough or the topography of the site. This whole site was the former Wyllie colliery and the initial part of The Glade was built on the former pit head baths. The remainder of the site still has the remains of concrete buildings which stood on the site. It is a brown field site which was used as industrial use previously yet it has been described as an unnatural extension to the village; what is being forgotten is the whole village was established as a result of the coal mine which is further on than the land in question so by history alone it should be part of the village and is ideal for further housing. The new site at The Glade allows for an extension and the road was laid out for continuation.

- **Upper Road, New Tredegar**

In particular the deletion of the Aberbargoed Tips site (FC04) will have implications on Strategy delivery in the Heads of the Valley area. This is acknowledged by the Council in the Re-Assessment of the Site in view of its proposed removal. Nevertheless the conclusion does not go as far as stating that it renders the Plan unsound. This is disputed as one of the Key components of the LDP Strategy is to "Allow for development opportunities in the Heads of the Valleys Area." The officer assessment of the site which is being promoted at Upper Road, New Tredegar is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough as a whole and the Heads of the Valleys area in particular.

- **Abernant Road, Markham**

In particular the deletion of the Aberbargoed Tips site (FC04) will have implications on Strategy delivery in the Heads of the Valley area. This is acknowledged by the Council in the Re-Assessment of the Site in view of its proposed removal. Nevertheless the conclusion does not go as far as stating that it renders the Plan unsound. This is disputed as one of the Key components of the LDP Strategy is to "Allow for development opportunities in the Heads of the Valleys Area." The officer assessment of the site which is being promoted at land at Abernant Road, Markham is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough as a whole and the Heads of the Valleys area in particular.

- **Opposite Brynderwen, Markham**

In particular the deletion of the Aberbargoed Tips site (FC04) will have implications on Strategy delivery in the Heads of the Valley area. This is acknowledged by the Council in the Re-Assessment of the Site in view of its proposed removal. Nevertheless the conclusion does not go as far as stating that it renders the Plan unsound. This is disputed as one of the Key components of the LDP Strategy is to "Allow for development opportunities in the Heads of the

Valleys Area.” The officer assessment of the site which is being promoted at land opposite Brynderwen, Markham is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough as a whole and the Heads of the Valleys area in particular.

- **Gwern y Domen, Caerphilly**

The officer assessment of the site which is being promoted at Gwern y Domen, Caerphilly is no longer sound as it does not take into account the major need which now exists for compensatory releases in the County Borough. This is particularly relevant in the Caerphilly area as, a year on from the publication of the Deposit Plan, there is no further evidence to demonstrate that the proposed Bedwas Colliery Scheme can be delivered within the plan period.

2.8 It should be noted that all of these sites have already been considered in terms of their suitability for residential use at previous stages of the plan preparation process. The sites that have been included within the Deposit LDP are considered to be more suitable for inclusion in the plan for housing for a variety of reasons. (*Refer to Council Consideration of Representations Report – 15th September 2009*)

2.9 It is not considered appropriate to introduce new development sites, which have been dismissed at previous stages of plan preparation at this late stage. The Inspector will consider the merits of the planning arguments in respect of each of these sites in due course. The comments in respect of the cumulative impact of the deletion of housing sites on the housing land supply is dealt with in Annex B and C.

2.10 It should be noted that the proposed alternative sites are supported by Sustainability Appraisal / Strategic Environmental Assessment submissions which in the respondents view demonstrate that overall positive impacts will result and that the sites should be allocated for residential development.

Site Specific Focused Changes that threaten the soundness of the Deposit LDP

2.11 A number of Respondents (***most notably the Welsh Assembly Government***) have raised concerns that a number of the Focused Changes, have been made against officer recommendation without any planning rationale having been provided. As a consequence it is suggested by WAG that the following focused changes must be unsound and the original position should be reflected in the plan:

- FC04 Deletion of Aberbargoed Plateau as a housing allocation (***Note: DE&T have made substantive objections to the deletion of this housing site***);
- FC07 Inclusion of Pendinas Avenue as a leisure allocation;
- FC08 Inclusion of Old Landfill Site, Hafodyrynys Hill, Crumlin as a leisure allocation;
- FC09 Inclusion of Land at Hawtin Park, Pontllanfraith as a leisure allocation;
- FC10 Inclusion of Llancaiach View, Nelson as a Park & Ride Facility;
- FC11 Inclusion of the Nelson Bypass, Nelson;
- FC12 Deletion of Haulwen Road, Penpedairheol from the settlement boundary;
- FC13 Inclusion of Land off Penallta Road, Ystrad Mynach as a leisure allocation;
- FC15 Deletion of St Ilans Comprehensive School Site as a mixed-use

development site;

- FC16 Inclusion of Caerphilly Miners Hospital as a mixed-use development site.

3. SOUNDNESS OF THE LDP

3.1 When assessing the soundness of the LDP, the Inspector will exercise his professional judgement based on the evidence available, the representations made and the particular circumstances of the LDP and the area. The Inspector's overall aim will be to ensure that the LDP is sound and therefore can safely be adopted. It follows logically from the basic principles of the examination, assessing the soundness of the plan, that any changes made by the Inspector must themselves be demonstrably sound. Any changes must, for example:

- accord with national policy and the Wales Spatial Plan;
- not impact on anyone who has not had an opportunity to comment;
- be based on the evidence available at examination;
- be supported by clear reasons based on the evidence;
- accord with the strategy of the plan;
- be realistic and capable of delivery.

3.2 A variety of outcomes could flow from the assessment of soundness undertaken by the Inspector. **The most serious of which would be a finding of unsoundness leading to a recommendation by the Inspector that the plan be withdrawn.**

3.3 Prior to submission of the Deposit LDP to WAG and PINS, the plan was assessed to ensure that it complied with the test of soundness, including all relevant Regulations, the plan is internally consistent and has regard for other local plans and strategies. Consequently, in the view of your officers the Deposit LDP is sound.

3.4 It will be for the Planning Inspector to exercise his professional judgement based on the evidence available and the representations made as to whether or not the Deposit LDP and the Focused Changes suggested by the Council in the meeting on the 15th September 2009 are sound and whether or not the focused changes should be endorsed. It is important to remember that only the Planning Inspector can make any changes to the Deposit LDP at this stage.

3.5 Notwithstanding this, the Council as the Local Planning Authority should also ensure that any focused changes recommended to the Inspector are demonstrably sound).

4 SUBMISSION TO WAG AND PINS

4.1 All of the duly made representations submitted in respect of the focused changes have been forwarded to the Welsh Assembly Government for information and to the Planning Inspectorate for consideration.

5 CONSIDERATION OF REPRESENTATIONS

- 5.1 The *Council Consideration of the Representations to the Focused Changes Report* considers the representations made against each of the Focused Changes.
- 5.2 Annex A, B and C provides background information to help Members deliberations.

Update of the Affordable Housing Target Calculation

- 1.1 A Supplementary Paper to Background Paper 6 on Population and Housing was produced prior to the Council meeting on 15th September 2009 to provide an update of the affordable housing target in order to reflect the findings of the Affordable Housing Viability Assessment
- 1.2 However, at the meeting of Council on 15th September 2009, it was resolved that recommendations should be made to the Planning Inspector that six housing sites be removed from the LDP, totalling 986 units.
- 1.3 In calculating the affordable housing target, assumptions were made on securing affordable housing on windfall sites and the new housing sites required to meet a housing requirement of 8,625 units rather than the total housing that the plan makes provision for i.e. over 10,000 dwellings. As an over-allocation has been made for housing, the 986 units recommended for removal reduces this over-allocation. Sufficient sites still therefore remain to meet the 8,625 dwellings total housing requirement.
- 1.4 However, the calculation considers the distribution of allocated sites across sub-market areas to inform a realistic distribution of where the additional units will be developed. The deletion of sites in different market areas consequently impacts upon the distribution of sites across the County Borough, which impacts upon the calculation.
- 1.5 It is therefore necessary to revise the calculation to reflect changes in the distribution of sites. This revised target for the provision of affordable housing uses the same methodology as used to calculate the original target and the target identified in Supplementary Paper 5.
- 1.6 The first step required to calculate this revised affordable housing target is to consider the updated distribution of units across the sub-market areas. This is illustrated in Table 1.

TABLE 1 - DISTRIBUTION OF HOUSING SITES ACROSS SUB-MARKET AREAS

	Number of units	Distribution by sub-market area%
Caerphilly Basin	2,310	39.7
NCC (excluding Newbridge)	1,219	20.9
Rest of Caerphilly	1,077	18.5
HOVRA	1,215	20.9
Total	5,821	

- 1.7 The next stage of the calculation involves examining the number of units upon which affordable housing could potentially be sought through the planning system. This is taken from Table 6.9 of the Population and Housing

Background Paper, which identifies that it would only be realistic to seek affordable housing on windfall sites and new housing sites required to meet the housing requirement, as shown in Table 2.

TABLE 2 - NUMBER OF UNITS UPON WHICH AFFORDABLE HOUSING COULD BE SOUGHT

	Number of units
Windfall	800
New housing sites required to meet housing requirement	2,277
TOTAL	3,077

- 1.8 In order to calculate the target, it is then necessary to apply the distribution of housing allocations by sub-market area in Table 1 to the number of units upon which affordable housing could potentially be sought, which provide an indicative distribution of both the new and windfall sites.

TABLE 3 - DISTRIBUTION OF NEW UNITS ACROSS COUNTY BOROUGH

	Distribution by sub-market area%	Number of units
Caerphilly Basin	39.7	1,222
NCC (excluding Newbridge)	20.9	643
Rest of Caerphilly	18.5	569
HOVRA	20.9	643
Total		3077

- 1.9 Using this information, the proportion of affordable housing that can reasonably be required from the total number of new units and windfalls can be calculated on the basis of the sub-market area requirements identified within the Viability Assessment.

TABLE 4 - NUMBER OF AFFORDABLE UNITS BY SUB-MARKET AREA

	Distribution of units	Affordable housing requirement %	Sub-market targets
Caerphilly Basin	1222	40	489
NCC (excluding Newbridge)	643	25	161
Rest of Caerphilly	569	10	57
HOVRA	643	0	0
Total	3077		706

- 1.10 In addition to this, the existing number of committed sites for affordable housing needs to be taken into account. It is appropriate to use the same figures as previously used in the Population and Housing Background Paper. This has been calculated on the basis of completions and units under construction within the first year of the plan period (1st April 2006 to 1st April 2007), in addition to those that have been negotiated as part of Section 106 Agreements as of the base date of 1st April 2007. This equates to **244 affordable units**.

TABLE 5 - AFFORDABLE HOUSING TARGET

	Number of units
Realistic proportion from windfall and new allocations	706
Committed Sites	244
Affordable Housing Target	950
Annual target	63

- 1.11 As shown in figure above, the affordable housing target to be delivered through the planning system equates to **950 dwellings**.
- 1.12 BP6 Supplementary Paper 5 provides evidence to justify the overall target for the delivery of affordable housing through all mechanisms would be 4 times that which can be delivered through the planning system. As such it is necessary to also revise the overall figure for affordable housing delivery:

$$950 \times 4 = 3,800$$

- 1.13 It is therefore considered that this target of **approximately 3,800 dwellings** be included with Policy SP17 on the Affordable Housing Target.

Update of Housing Supply Calculation after Council Resolutions of 15th September 2009

- 1.1 A Supplementary Paper to Background Paper 6 on Population and Housing was produced prior to the Council meeting on 15th September 2009 to provide an update of the housing land supply calculation to reflect new figures available for housing completions in the first three years of the plan period, as well as updating other assumptions that inform the housing land supply calculation.
- 1.2 This Supplementary Paper on Housing Land Supply also considered the impact on this updated overall land supply figure if four housing sites were deleted from the plan in line with officer recommendations and recommendations by the LDP Focus Group. This amended land supply table identified that even with the loss of four sites (HG1.14 Land fronting South View Terrace, HG1.25 Navigation Colliery, HG1.57 Brooklands Road and HG1.68 St Ilan's Comprehensive), the land supply figure would stand at 10,652 dwellings.
- 1.3 However, at the meeting of Council on 15th September 2009, it was resolved that recommendations should be made to the Planning Inspector that two further housing sites be removed from the LDP – namely HG1.19 Aberbargoed Plateau (413 dwellings) and HG1.32 Land at Hawtin Park (194 dwellings). Overall, there are recommendations for the removal of six sites as shown in Table 1.

TABLE 1 – RECOMMENDED HOUSING ALLOCATIONS TO BE REMOVED FROM THE LDP

LDP Ref	Site Name	Settlement	Size (Ha)	Units in Deposit LDP
HG 1.14	Land fronting South View Terrace	New Tredegar	0.56	20
HG 1.19	Aberbargoed Plateau	Aberbargoed	11.80	413
HG 1.25	Navigation Colliery	Crumlin	4.20	145
HG 1.32	Land at Hawtin Park	Pontllanfraith	5.55	194
HG 1.57	Brooklands Road	Pontymister	0.39	14
HG 1.68	St Ilans Comprehensive	Caerphilly	12.67	200
		TOTAL	35.17	986

- 1.4 As set out in the Supplementary Paper, the overall land supply has been amended to reflect the most recent information available on remaining site capacity, taking into account completions and units under construction as of the base date 1st April 2009. The number of units on sites upon which there is a recommendation to remove allocations can then be subtracted from the total capacity to determine how much land is still available in terms of allocations as shown in Table 2.

TABLE 2- AMENDED TOTAL CAPACITY OF HOUSING ALLOCATIONS

		Total Units
A	Deposit LDP capacity of housing land	6,667
B	Amended site capacity in light of completions and units	6,171

	under construction on allocated sites	
C	Units lost due to recommendation to delete housing sites	986
D	Amended capacity of sites (B-C)	5,185

- 1.5 Having established that the amount of land allocated has decreased from 5,792 as identified in Supplementary Paper 3 to 5,185, this new figure can be factored into the updated land supply calculation. This is shown in Table 3 below.

TABLE 3 – HOUSING SUPPLY CALCULATION

A	Completed units 1st April 2006 -1st April 2009	1,888
B	Units Under Construction 1st April 2009	283
C	Allowance for windfall sites	1,200
D	Allowance for small sites	1,100
E	Empty properties brought back into use	300
F	Allowance for conversions	142
G	Allowance for demolitions	-53
H	Remaining provision in LDP	5,185
	Total Number of Units	10,045
	Housing requirement	8,625
	Capacity of housing land	10,045
	Excess of capacity over requirement	1,420
	Allowance for choice & flexibility (%)	16.5

- 1.6 It should be noted that the land supply figure would still equate to 10,045 dwellings, which is above the SEWSPG apportionment figure of 9,750 dwellings.
- 1.7 It should also be noted that five of the six sites will remain as unallocated sites within the LDP defined settlement boundary and therefore future applications for development including housing may be acceptable in principle in the future taking into account all other material considerations. In light of this, it is considered that the figure assumed for windfall may realistically be higher than identified if site-specific constraints could be overcome, therefore increasing the land supply figure.

CUMULATIVE IMPACT OF FOCUSED CHANGES ON HOUSING LAND SUPPLY

Concerns have been raised that no compensatory sites have been proposed to address the perceived shortfall that would result from the deletion of HG1.19 Aberbargoed Plateau and other sites.

Taking into account all recommended focused changes a total of 986 dwellings over six sites have been recommended to the Inspector for removal from the plan. If a direct comparison were made with the Deposit LDP figure based on the housing supply situation as of 1st April 2007, the total land supply figure would equate to 9,417 dwellings.

However, it should be noted that BP6 Supplementary Paper 3 on Housing Land Supply considers a more up-to-date position on housing land supply, which takes account of completions in the first three years of the plan period up to 1st April 2009, as well as updated assumptions on windfall sites, empty properties, conversions, small sites and demolitions. If the total units on housing sites recommended for removal were factored into this updated housing supply calculation, the land supply figure would equate to 10,045 dwellings, which still offers a significant degree of flexibility and choice.

It should also be noted that five of the six sites recommended for removal, will remain as unallocated sites within the settlement boundary and therefore future applications for development including housing may be acceptable in principle in the future, subject to taking into account all other material considerations. In light of this, it is considered that the figure assumed for windfall may realistically be higher than identified if site-specific constraints could be overcome, therefore increasing the land supply figure further.

In light of the above, it is considered that sufficient land is still available to meet LDP requirements, and therefore the recommendations will not have an adverse effect on the soundness of the LDP.

Since the preparation of the Deposit LDP, WAG have published for the first time local authority projections using a 2006 base for both population and households in the period up to 2031. The WAG 2006-based household projections identify an increase of 11,300 households, 2,675 households higher than the housing requirement of 8,625 for which the plan makes provision by the end of the plan period.

Representors have raised concerns about the significant shortfall between the provision in light of the Focused Changes and the 2006-based projections. The Council's response to the publication of the 2006 Population and Household projections is set out within Supplementary Paper 1 of Background Paper 6. However, the key point to note is that this is the first time such projections have been published at local authority level, there has currently been no opportunity for the figures to be reviewed by users. There is concern regarding the projections for Caerphilly, as they are considerably higher than would be expected on the basis of long-term trends. These projections were not available at the time of preparation of the Deposit LDP and therefore the First Review of the LDP, which is likely to be nine years into the plan period, is considered to be a more appropriate time to review this new information.

It is considered that the total housing requirements set out in the LDP are based on robust and credible evidence and sufficient land is still available to meet these requirements.

The 15 sites that are being promoted as alternatives in order to address the perceived shortfall in housing resulting from the recommendations to delete housing sites have all been considered previously as candidate sites and/or alternatives sites where it was concluded that they were not suitable for inclusion in the Deposit Plan. The justification for this is set out on a site-by-site basis in the Council Consideration of Representation report presented to Council on 15th September 2009. As the sites being promoted were not subject to a Focused Change, this consultation is not the appropriate time to reconsider the merits of otherwise of the sites in question.