



Caerphilly County Borough Local Development Plan

Supplementary Paper Focused Change FC15 - St Ians Comprehensive, Caerphilly (HG1.68, CF1.28 LE4.13)

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**Supplementary Paper
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1. Introduction

- 1.1 This paper should be read alongside Background Paper 6: Population and Housing (October 2008) and Background Paper 6: Supplementary Paper 3 - Housing Land Supply (September 2009).
- 1.2 This additional note has been produced in direct response to the issues raised at the Exploratory Meeting held on the 8th December 2009 by the Planning Inspector (Mr Alwyn Nixon) responsible for the Examination of the Deposit LDP.
- 1.3 The Paper will address the following issues raised by the Inspector, namely:
 - The Rationale for the Focused Changes decision
 - The implications of the Focused Change for the LDP Strategy.
 - The implications of the Focused Change in delivering the LDP target for housing and affordable housing, as well as other strategic elements.

2. Rationale for the Focused Change Decision

- 2.1 The Deposit Local Development Plan allocates the St Ilan site for a mixed-use development incorporating housing, leisure and educational facilities. The proposal for this site includes the relocation of Ysgol Gymraeg Caerphilly and Plasyfelin Primary School to the listed school buildings at the former St Ilan's Comprehensive (allocation CF1.28) and the use of the residual land for leisure (allocation LE4.13) and housing (allocation HG1.68).
- 2.2 The designation of the site for a mixed use development was considered realistic and achievable when the plan was written in 2008 as Cabinet, at its meeting on 31st July 2007 resolved to endorse proposals to utilise the main school buildings at St Ilan for the relocation of Ysgol Gymraeg Caerphilly and Plasyfelin Primary School and to progress the development of the residual land for residential purposes.
- 2.3 The introduction of the Welsh Assembly Government initiative 'Transforming Education and Training Provision in Wales' in late September 2008 has led to a change in circumstances pertaining to educational provision, placing a duty upon the Council to produce and submit a strategic outline programme initially, supported by a strategic outline case in order to establish the need for change in educational facilities in the county borough, and the level of investment required to implement identified changes. The implications of this initiative were not taken into account in the Deposit LDP, as they were not known at the time of publication of the Deposit Plan in October 2008.
- 2.4 The Council recognises the need to review its education strategy to take on board the Transformation agenda and the 21st Century Schools Programme. Concerns have been raised as part of this work, that there is a need for extra Welsh Medium School places in the future within the south of the County Borough. It is considered that the redevelopment of the St Ilan Site for an alternative land use would be premature given the changing circumstances, as the re-use of St Ilan for Welsh Medium education would be considered as an option to address the need for extra Welsh medium places given its location and the fact that the school complex remains.

- 2.5 The LDP Focus Group at its meeting on 4th June 2009, considered the report of representation for the St Ilan site and concluded that the housing allocation on this site could potentially constrain the Council's emerging education strategy. Consequently the LDP Focus Group resolved to recommend to Council that the proposals for the St Ilan site be removed in order to retain sufficient flexibility pending the completion of the review of the education strategy. The LDP Focus Group further recommended that the site remain as an unallocated area of land, contained within the settlement boundary of Caerphilly Town.
- 2.6 On the basis of the recommendations made by the LDP Focus Group, on the 15th December 2009 the Council resolved to recommend to the Planning Inspector that the Deposit Plan allocations be removed and the site remain unallocated in order to ensure the necessary degree of flexibility for the future use of the site.
- 2.7 This decision is considered to be 'sound' as the proposals in the LDP should be realistic, achievable and deliverable. There is no longer any certainty that Ysgol Gymraeg Caerphilli and Plasyfelin Primary School will be relocated to the listed school buildings at the former St Ilan's Comprehensive and that the remainder of the site can be released for residential development. Indeed it may well be the case that the site will be retained for educational use to meet the need for extra welsh medium school places within the south of the County Borough. However until such time as the work on the education strategy is completed neither proposal is certain.
- 2.8 The timescale for completion of the work associated with the WAG education initiative does not coincide with the timescale for work being undertaken on the LDP. The review of the education strategy will not be complete until the end of 2010 at the earliest. It is inevitable that given the length of the plan preparation process new initiatives will continue to emerge throughout the process which are likely to have land use implications. In this case, the work could realistically impact on the St Ilan Site and it would be prudent to ensure that the LDP is flexible enough to enable the most suitable development of the site to occur.

3. Implications of the Focused Change on the LDP Strategy

- 3.1 The inclusion of the St Ilan site as a housing allocation is not fundamental to the delivery of the overall LDP Strategy as St Ilan comprises less than 2% of the total housing land supply of 10,403 dwellings for which the Deposit LDP makes provision. This is evidenced in Background Paper 6: Supplementary Paper 3. This paper provides an update of the housing land supply calculation to reflect new figures that are available on housing completions as a result of surveys undertaken as part of the Joint Housing Land Availability Studies for 2007/8 and 2008/9. In addition it evidences high rates of completion in the first 2 years of the plan period, justifies higher assumptions for windfall completions based on past experience and justifies a higher assumption for empty properties being brought back into beneficial use. The paper demonstrates that the loss of the St Ilan's housing allocation will not undermine the LDP strategy, as there are still sufficient housing allocations within the Southern Connections Corridor (SCC), with it having the highest proportion of sites that are already committed for residential development (51% of all allocations in the strategy area) across the three strategy areas. The removal of St Ilan's for housing would not adversely affect the soundness of the plan or the ability to deliver the LDP strategy.

4. Implications of the Focused Change in Delivering the LDP Target for Housing and Affordable Housing,

- 4.1 In housing terms the LDP should seek to ensure that sufficient land has been allocated to meet its housing requirement for the plan period. The Deposit LDP incorporated an over-allocation of housing land that amounted to over 20% of the LDP requirement. It is standard practice to include an over-allocation element to cover for sites that may, due to circumstances not known at the time of drafting the plan, not be developed during the plan period and to provide a range and choice of sites throughout the plan period. The loss of this site is not significant in terms of overall housing provision and therefore does not adversely affect the strategy in this respect.
- 4.2 The position is similar in respect of the provision of affordable housing, which is outlined above and explained in greater detail in the “Maximising Affordable Housing” supplementary paper.
- 4.3 In summary the development of the St Ilan site for housing is not essential in terms of delivering the affordable housing target for the LDP, as the affordable housing target is calculated on the housing land requirement not the level of allocation in the LDP. St Ilan would have had the potential to deliver 80 units of affordable housing, subject to site-specific consideration at planning application stage, as the site is within a market area where 40% affordable housing would be viable.
- 4.4 Whilst it is recognised that Caerphilly, as part of the South market area identified within the LHMA, is the area with the highest level of need, a significant number of other affordable units are anticipated within this area which will help address this need. In the Caerphilly Basin alone a total of 187 affordable units across six sites are already committed through the planning system (subject to the signing of a Section 106 agreement on three sites) for affordable housing. The units on two of these sites have been completed or are under construction. These committed sites are therefore considered to be realistic propositions in delivering affordable housing. In addition, there are a total of 139 units already committed on allocated housing sites in the Caerphilly Basin that have been secured outside of the planning system through RSLs own build programmes, with significantly more housing realistically anticipated to be delivered through this mechanism on sites that are not allocated in the plan. Furthermore, 311 affordable units could be delivered on other allocated sites through the application of Policy CW14, in addition to units also secured on windfall sites.
- 4.5 Collectively, through the planning system and the RSLs own build programmes, a significant number of affordable houses are already committed or anticipated in the Caerphilly Basin. Whilst it cannot be denied that the development of St Ilans could have played a role in delivering a number of affordable units in this area, it is realistic to assume that significant contributions will be made through the 14 other allocations based upon which affordable housing could be sought as there is greater certainty regarding the development of these sites. Given the availability of these other sites to deliver affordable housing, it is not considered that the objective of the plan to *‘ensure an adequate and appropriate range of housing sites are available across the County Borough in the most suitable locations to meet the housing requirements of all sections of the population’* is undermined by the recommended removal of the St Ilans site.
- 4.6 As demonstrated, the removal of St Ilans for housing development would not adversely affect the soundness of the plan as the removal of the site would not

significantly affect the provision of housing and would therefore have little impact on the delivery of both the overall housing target and the target for affordable housing.

5. The Strategy Implications of retaining St Ilan as an Unallocated Site

- 5.1 The purpose of the LDP is to provide a practical and detailed basis for the control of the development and use of land through the development control system. It provides potential developers with a clear indication of the type and location of development, which the Council would accept and encourage, and an equally clear indication of the circumstances in which development will be resisted. In addition it provides an incentive to developers by allocating land for particular types of development and ensures that sufficient land has been identified to meet the needs of the county borough over the plan period.
- 5.2 It is not the role of the LDP to stifle acceptable development and in this context the plan provides a policy framework for the consideration of development proposals that come forward on unallocated sites to provide potential developers with certainty in terms of the types of development that would be acceptable.
- 5.3 Land use proposals within the plan should be realistic, achievable and deliverable within the plan period. If the mixed-use allocations for St Ilan remain within the plan, they are unlikely to be considered to be realistic, achievable and deliverable due to the uncertainty arising from the emerging education strategy. The decision to remove the land use designations from the St Ilan site is therefore appropriate as they could stifle acceptable development proposals for the site and pose a constraint to future development opportunities.
- 5.4 The non-allocation of the site does not generate uncertainty. The site is acknowledged as being suitable for development. It is located in the settlement boundary and accords with the strategy aspirations of the Deposit LDP. Furthermore, the site has been subject to detailed assessment as part of its consideration for inclusion in the Deposit Plan, therefore the major impediments to development upon this site are now known and this information is in the public domain.
- 5.5 One of the major impediments to development that was identified as part of the detailed assessment of the site was 'flood risk'. As a consequence the site was subject to a flood consequence assessment, which demonstrated that only a small proportion of the site was liable to flood and that through sensitive design any impact could be mitigated. Rather than generating uncertainty, this information can only serve to assist developers in bringing forward future proposals for the site.

6. Conclusion

- 6.1 The decision to remove the mixed use allocation from the St Ilan Site and thus unallocated, is considered to be 'sound' as there is no longer any certainty that Ysgol Gymraeg Caerphilli and Plasyfelin Primary School will be relocated to the listed school buildings at the former St Ilan's Comprehensive and that the remainder of the site can be released for residential development in the plan period.
- 6.2 Given that at present the education strategy is under review, it is unclear as to whether the site will be required, in whole or part for education purposes.
- 6.3 If the allocations remain they may not be realistic, achievable or deliverable and would restrict the use of this land during the plan period. Therefore, the Council considered it appropriate to remove all allocations from the St Ilan site including the

housing allocation, as there is no certainty that allocations are achievable until the education strategy has been finalised.

- 6.4 This paper demonstrates that removal of the mixed use allocation from the St Ilan site is not fundamental to the delivery of the plan as its removal would not adversely affect:
- the provision of housing and would therefore have little impact on the delivery of both the overall housing target and the target for affordable housing.
 - the soundness of the plan or the ability to deliver the LDP strategy