



Caerphilly County Borough
Local Development Plan

Hearing Session 2
Population, Housing & Housing Land Supply
MATTERS ARISING

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INTRODUCTION

1.1 This paper has been produced in direct response to issues raised at Hearing Session 2 **Population, Housing & Housing Land Supply** held on the 26th April 2010 at the request of the Inspector (Mr Alwyn Nixon).

1.2 The paper addresses:

2. Clarification in respect of

A Regional Housing Apportionment Exercise;

B Queries in respect of details contained within Background Paper 6;

C Information in respect of assumptions underpinning the natural change component of the moderate growth strategy;

D Clarification in respect of the Housing MIPPS; and

3. Deliverability

4. Policy SP7 Planning Obligations

Policy SP16 Total Housing Requirements

1.3 It should be read in conjunction with:

- **SB31** LDP Background Paper 6 - Population and Households (October 2008);
- **SB32** Supplementary Paper 1: WAG 2006- Based Population & Household Projections (September 2009);
- **SB33** BP6 Supplementary Paper 2 - Housing Site Categorisation Exercise
- **SB34** BP6 Supplementary Paper 4 – Affordable Housing Viability Assessment
- **ED13** Supplementary Paper 6: WAG 2006- Based Population & Household Projections (January 2010).
- **SB81** Deposit LDP - Appendices to Written Statement (Appendix 20)
- **SB44** Background Paper 14 – Candidate Site Assessment Methodology
- **LA48** Joint Housing Land Availability Study 1st April 2009
- **LA46/LA47** Update on Planning consents December 2009/March 2010
- **SB57** Council Consideration of Representations
- **ED11** Council Consideration of Representations on Focused Changes
- **ED18** Maximising Affordable Housing

1.4 The paper is structured in line with the notes from Hearing Session 2.

Section 2. Clarification Notes

A. Housing Apportionment

The Regional Household Apportionment Exercise Background

A.1 Following a presentation by WAG statisticians on the 2003 based sub-regional population and housing projections, and subsequently a ministerial MIPPS requiring area collaboration on housing provision in development plans, the South East Wales Strategic Planning Group (SEWSPG) carried out an apportionment exercise for the ten unitary authority areas in South East Wales. This process took place over a twelve month period between May 2006 and May 2007. In that time a number of draft working tables were produced apportioning housing figures between the ten constituent county boroughs.

A.2 An apportionment workshop was held in January 2007 under the auspices of Cardiff University, at which housebuilders and environmental groups were present as well as local authority representatives. Following this workshop a 'final' apportionment table (see Appendix 1 to this note) was produced attached to a Memorandum of Understanding, to be endorsed by the constituent authorities. In this table the Caerphilly apportionment for 2003-2021 was 11,450 households, (proportionately, 9,542 for 2006-21). This would represent average household formation of 636 per annum translated into a dwelling completion rate of 650 dwellings per annum.

A.3 The Memorandum of Understanding and accompanying table was endorsed by Caerphilly county borough council's cabinet on 22nd May 2007 as *one option* to be considered in the LDP Strategy document.

How were the figures for Caerphilly derived?

A.4 In order to determine the levels of growth that each authority could potentially accommodate, officers in each SEWSPG authority were initially asked to consider land availability within their area having regard for such factors as:

- the proposals for South East Wales in the Wales Spatial Plan,
- previous house-building rates,
- land availability, and
- the aspirations of individual authorities.

A.5 Within this context an initial capacity exercise was undertaken in Caerphilly, which produced the following estimate;

UDP H1 sites	2348
UDP HC sites	410
Windfall sites since 2003	1090
Anticipated windfall sites	3375
Small sites (under 10)	<u>1290</u>
Subtotal	8513

A.6 In addition it was assumed that a number of large brownfield sites within UDP settlement limits could be developed for (100%) housing. These sites were estimated to be able to accommodate an additional 2665 dwellings, giving a total capacity of **11178** (745 per annum).

A.7 Work on the apportionment exercise continued throughout the remainder of 2006 and into 2007, while at the same time, work was proceeding in Caerphilly county borough council on refining these estimates for the Caerphilly LDP Strategy document. It became apparent to officers in Caerphilly that the initial capacity calculation for Caerphilly was too high, principally because it assumed that;

- all identified sites would be developed by 2021;
- they were all capable of delivery during this period even though some had serious constraints (the initial assessment was undertaken in advance of the candidate site assessment process); and
- they would be developed for 100% housing and not for mixed use or any other use.

In addition the windfall assumption (225 per annum) that had been factored into the original exercise was extremely high and was not considered deliverable or desirable.

A.8 SEWSPG therefore agreed that the initial projected apportionment of households for Caerphilly County Borough could be revised downward to 650 dwelling completions per annum in the table that accompanied the Memorandum of Understanding. This implies a population of **180,000** in 2021, an increase of 8,700, or 5.1%, over the 2006 mid-year estimate of 171,300. It represents a 16% increase in completion rates over the average for 1991-2005.

Preferred Strategy

A.9 In line with the cabinet decision on the Memorandum of Understanding the SEWSPG apportionment figure was included in the range of possible future population and housing levels during the consultation on the LDP Preferred Strategy carried out in April / May 2007. (**Section 8: Land Supply to meet the Preferred Strategy**). Subsequently the Council chose the Moderate growth option in the Preferred Strategy, which was a figure below the SEWSPG apportionment.

Request for SEWSPG minutes in respect of the WAG 2006-based Projections

A.10 As requested by the Inspector a copy of the minutes of the SEWSPG Officer Meeting of 17th November 2009 that relate to concerns raised in respect of the WAG 2006-based projections are attached at Appendix 2 for information.

B. SB31 Background Paper 6 Population and Housing

B.1 At the hearing session the Inspector raised a number of queries regarding numbers contained within SB31. Clarification is provided below in this respect. The changes or additional pieces of information are indicated in **red** for ease of reference.

Table 4.3 Population change for UAs in South East Wales, 2001-2006

Unitary Authority	2001	Total Change	Natural Change	Migration (1,000)	2006
Blaenau Gwent	70,000	-0.7	-0.8	0.1	69,300
Bridgend	128,700	3.9	0.5	3.4	132,600
Caerphilly	169,500	1.8	1.2	0.6	171,300
Cardiff	310,100	7.4	4.7	2.7	317,500
Merthyr Tydfil	56,200	-0.7	-0.1	-0.6	55,500
Monmouthshire	85,000	2.9	-0.2	3.1	87,900
Newport	137,600	2.5	1.5	1.0	140,100
Rhondda Cynon Taff	231,900	2.0	0.5	1.5	233,900
Vale of Glamorgan	119,300	4.0	0.1	3.9	123,300
Torfaen	90,900	0.1	0.3	-0.2	91,000
South East Wales	1,399,200	23.2	7.7	15.5	1,422,400

Source: ONS Mid Year Estimates and National Censuses

Table 4.4 Migration indicators for UAs in South East Wales, 2001-2006

Unitary Authority	2001	Migration 2001 - 06	Migration rate %
Monmouthshire	85,000	3,100	3.6
Vale of Glamorgan	119,300	3,900	3.3
Bridgend	128,700	3,400	2.6
Cardiff	310,100	2,700	0.9
Newport	137,600	1,000	0.7
Rhondda Cynon Taff	231,900	1,500	0.6
Caerphilly	169,500	600	0.4
Blaenau Gwent	70,000	100	0.1
Torfaen	90,900	-200	-0.2
Merthyr Tydfil	56,200	-600	-1.1
South East Wales	1,399,200	15,500	1.1

Source: ONS Mid Year Estimates and National Censuses

B.2 Further to revisiting Section 4 of BP6, it is evident that the following paragraphs (4.4.8 to 4.4.13) require amendment, as there appear to be a number of errors in this section of the paper as follows:

- 4.4.8 The first point to make is that most of the net in-migration into the region between 2001 and 2006 was to the authorities along the M4 corridor, i.e., (Vale of Glamorgan (3,900), Bridgend (3,400), Monmouthshire (3,100), and Cardiff (2,700), with the Valleys authorities experiencing only smaller levels of net in-migration, or even net out-migration in Merthyr Tydfil and Torfaen. The net in-migration into Caerphilly (**600**) accounted for **4%** of that into the region, although the borough contains 12% of the population.
- 4.4.9 Another way of looking at this is to calculate the **migration rate**, i.e., the net in-migration into each UA as a percentage of the base population (see table 4.4 above). The table shows that the migration rates for the five M4 authorities are all greater than those for the five Valleys authorities.
- 4.4.10 To estimate what might happen in the future, it is suggested that the highest level of net in-migration that Caerphilly might achieve would occur if the migration rate for the County Borough were to increase from **0.4%** (refer to **table 4.4**) to the average figure for the region of 1.1%. This would imply an increase in the annual net in-migration figure for Caerphilly from 120 to 330 persons per year, or **4,950 persons (rounded to 5,000) persons** over the Plan period. Together with the natural change component, this would imply a population for Caerphilly of **180,000** in 2021.
- 4.4.11 It is proposed that this scenario should be called **High Growth**, leading to a population for Caerphilly of **180,000 in 2021**, and implying a total housing requirement over the Plan period of 9,750. It may be noted that this figure is close to the Council's estimate of that resulting from the Regional Housing Apportionment exercise, i.e. **180,300**, which is thus about the highest level that would be considered credible on the basis of local considerations.
- 4.4.12 Further, it is proposed that a **Moderate Growth** scenario should be identified mid-way between the Balanced Migration and the High Growth scenarios: this would be based on an assumption of annual net in-migration of 165 persons, leading to a population for Caerphilly of 177,500 in 2021, and implying a total housing requirement over the Plan period of 8,625.
- 4.4.13 The three options for the future population levels of the County Borough, and the implied housing requirements over the Plan period, are then:

Option	Population	Housing Requirements 2006 to 2021	Annual House-building requirement
Balanced Migration	175,000	7,500	500
Moderate Growth	177,500	8,625	575
High Growth	180,000	9,750	650

Household to Dwelling Ratio

B.3 Clarification is outlined below in respect of the assumptions that have been used in the moderate growth scenario in terms of the Household to Dwelling Ratio.

- There is no agreed ratio to convert households to dwellings.
- For the purposes of the plan the Council has assumed a ratio of 1:1 i.e. 1 Household = 1 Dwelling

B.4 The Regional Apportionment Exercise utilised the Chelmer Model and therefore the assumptions in terms of households to dwellings differ from those used by the Council. This model and the formula that has been applied to derive households are explained in **Appendix 3**.

Average Household Size – Caerphilly CBC

B.5 Clarification in terms of the assumptions made in respect of household size is outlined below:

- 2003 projections saw the average household size (AHS) for SE Wales fall by 8.1%. The AHS for Caerphilly in 2006 was 2.38. If the AHS falls by a similar rate in Caerphilly as in SE Wales, the AHS would be 2.19.
- When compared to the 2006 projections, it will be noted that the figures are broadly comparable with a 2.35 AHS in 2006 dropping to 2.14 in 2021, or a 8.9% fall over the plan period.
- For the purposes of the plan an average figure has been taken of 2.2 (2.24 - rounded). It is assumed for the purposes of the calculation that this figure is constant across the plan period.

C ED13 BP6 Supplementary Paper 6 WAG 2006 based population & household projection

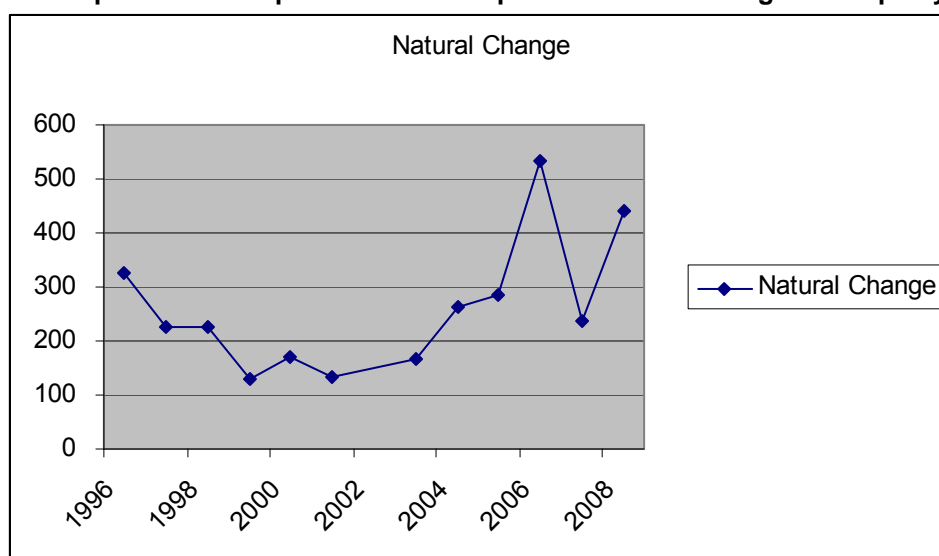
Moderate Growth Scenario

C.1 In general there have been decreases in numbers of both births and deaths nationally and locally. **Birth rates are at historically low levels**, and are below the level required to maintain a constant population.

C.2 Based on the long trend (1996-2006) the assumption that underpins the natural change component of the Moderate Growth Scenario is that the growth resulting from the forecast numbers of births and deaths over the plan period would average approximately 246 persons p.a. (*refer to Appendix 3*).

C.3 As indicated in Paragraph 4.4.2 of Background Paper 6 it is normal for the minimum future population levels to be taken to be those of the current resident population, subject to only natural change, i.e., taking into account only forecast numbers of births and deaths, assuming no migration (or more accurately, zero net migration). On this basis it was estimated that the population of the County Borough would rise to 175,000 in 2021, from a 2006 base population of 171,300 averaging approximately 246 persons per year.

Figure 1: Graph to indicate past trends in respect of Natural Change – Caerphilly CBC



Note: In 2002 the vital statistics circulars were withdrawn, so no figures are available for this period.

Note: Graph 1 also illustrates the 2007/2008 natural change figures.

Table 1: Past Trends in respect of Natural Change – Caerphilly CBC

Year	Live Births	All Deaths	Natural Change
1996	2,213	1,886	327
1997	2,150	1,924	226
1998	2,143	1,917	226
1999	2,053	1,925	128
2000	2,017	1,847	170
2001	1,974	1,840	134
2002	*	*	*
2003	2,005	1,837	168

2004	2,118	1,856	262
2005	2,055	1,768	287
2006	2,167	1,635	532

Average 246

- Note: Source data for past trends Office of National Statistics
- Note: In 2002 the Vital Statistics circulars were withdrawn, so no figures are available for this period

2007	2,069	1,831	238
2008	2,223	1,782	441

- Note: Average natural change taking into account 2007 & 2008 would increase to **262** p.a.

Natural Change Assumptions 2006-Based Projections

C.4 The major reason for the growth in population as outlined in the 2006 population projections is natural change, which averages nearly 500 persons per year. This is not only an extremely high figure for the county borough compared to past trends, but it is also very consistent throughout the projection period.

C.5 This high level of natural change is perhaps somewhat unexpected during a period of demographic decline: throughout the projection period the Total Fertility Rate (i.e. the expected number of children per woman) is under the replacement rate of 2.1¹. It is also the case that the children of the post-war boom period reach their 60s during the projection period, and levels of mortality might have been expected to rise accordingly.

C.6 Another unexpected feature of the population projection is the very small variation in the annual estimates of the numbers of both births and deaths. It can be seen that over the 15-year period the number of births per year only varies between 2,067 and 2,164, and the number of deaths only between 1,631 and 1,674. These close limits on the numbers of birth and deaths do not necessarily cast doubts on the projection, but certainly suggest the merit of further investigation of the model's results.

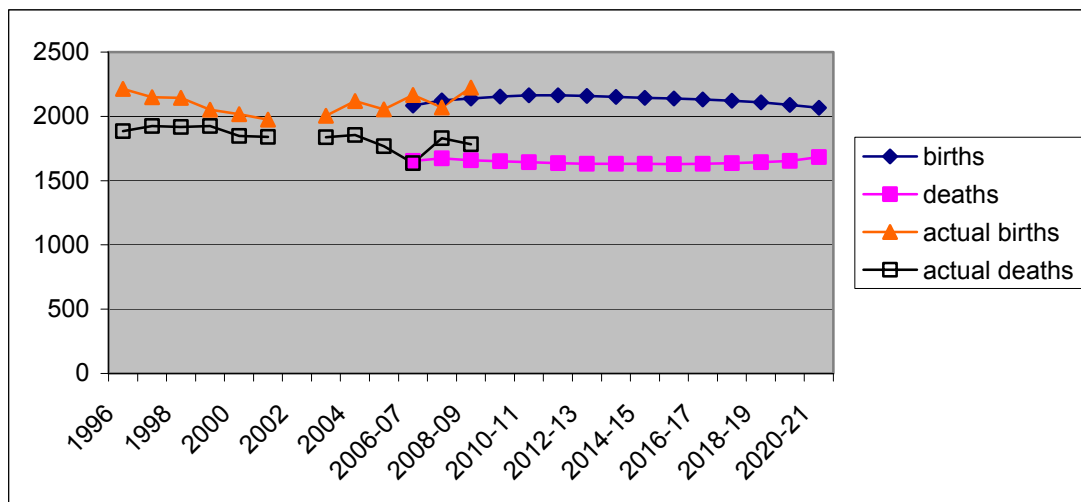


Table 2: Comparison of actual births & deaths with WAG 2006 Projection

¹ Although the 2006 population projection indicates that there has been an increase in birth rates, **it remains the case that it is not expected that they will reach replacement level¹ within the life-time of the LDP.** Mortality rates have fallen slowly for a long period, and it is anticipated that this improvement will continue.

C.7 Table 2 provides a comparison between actual births and deaths from 1996 – 2006 with the projected figures for births and deaths within the 2006 Projections. It should be noted that the figures aren't directly comparable as the actual figures are calendar years whereas the WAG projections are not.

Table 3: WAG 2006-Based Natural Change Assumptions

Year	Births	Deaths	Natural Change
2006/07	2,085	1,653	432
2007/08	2,125	1,674	451
2008/09	2,140	1,659	481
2009/10	2,153	1,652	501
2010/11	2,163	1,643	520
2011/12	2,164	1,637	527
2012/13	2,158	1,632	526
2013/14	2,151	1,631	520
2014/15	2,145	1,630	515
2015/16	2,139	1,629	510
2016/17	2,132	1,632	500
2017/18	2,122	1,635	487
2018/19	2,108	1,643	465
2019/20	2,089	1,654	435
2020/21	2,067	1,683	384
2006/21	31,941	24,687	7,254

Note: Average natural change 483 p.a.

Household Projections – Caerphilly CBC

C.8 In order to consider how the Council has calculated the likely number of households that need to be accommodated within the plan period, it is important to understand how the household number at the base date of 2006 has been derived.

C.9 The Council household estimate for the base date of 2006 is **71,477** households. This is calculated as follows:

Table 3: Caerphilly Local assumptions on number of Households as at 2006

Households		
Households 2001 (Census)		69,341
Dwelling Completions 2001-2006	2,194	
Households 2001 -2006 (96%*)		2,106
Households 2006		71,447

**Making the standard 4% allowance for vacant properties*

C.10 Having regard for the Population and Household Scenarios outlined at Appendix 3 the consequential dwelling requirements for the three scenarios are:

Consequential Dwelling Requirement					
	Population 2021	Households 2006	Households 2021	Dwelling requirement	Dwellings p.a.
		71,447			
Moderate Growth	177,500		80,072	8,625	575
High Growth	180,000		81,197	9,750	650
Low Growth	175,000		78,947	7,500	500

Note: Household to dwelling ratio 1:1

D Housing MIPPS

Affordable Housing Considerations in Determining the Total Housing Requirements

D.1 In line with paragraph 9.2.1 of the Housing MIPPS, in planning for the provision of new housing, consideration has been given to local housing requirements including affordable housing need, based on information from the Local Housing Market Assessment (see also Appendix 5).

D.2 The evidence indicating how affordable housing need has been considered is set out within the evidence base as follows:

- **SB31** Background Paper 6: Population and Housing
- **SB57** Council Consideration of Representations
- **ED11** Council Consideration of Representations on Focused Changes
- **ED18** Maximising Affordable Housing

D.3 It is recognised that an increase in the total housing requirement would also result in an increase in the ability to deliver affordable housing. However, consideration has been given to the implications of increasing total housing provision as a means of delivering affordable housing. The key points set out within this evidence are:

- The level of affordable housing need as identified in the LHMA (516 per annum) can never be met through the planning system as it equates almost to the average annual housebuilding rate identified in the LDP i.e. 92% of the total. It would be unrealistic to consider the planning system would be able to deliver such levels.
- The allocation of additional sites would maximise the amount of affordable housing that could be delivered. However, such sites are likely to be greenfield releases as suitable brownfield sites have already been allocated in the first instance. These greenfield sites will be more attractive to developers and are more likely to be developed at the expense of brownfield sites. This may result in brownfield sites (which better accord with the plan's strategy, national planning guidance and sustainability principles) remaining undeveloped.
- Addressing affordable housing need is not the only thing that the plan is seeking to achieve. The release of sites to facilitate the delivery of affordable housing would have significant negative effects on the ability to achieve other objectives of the plan, in particular the need to accommodate sustainable levels of population growth and to protect valuable landscapes and areas of nature conservation. Such an approach has the potential to undermine the whole ethos of the development plan, which seeks to "*guide growth and change within the context of sustainable development while protecting and enhancing local character and sensitive environments*" (LDP Wales, Para 1.2.iii).
- The social, environmental, cultural and infrastructure capacity to accommodate more housing are also factors identified in Paragraph 9.2.1 of the Housing MIPPS that should be balanced against housing needs.

Section 3 - Deliverability

3.1 This note aims to provide further clarification on the approach taken by the Council in considering the deliverability of sites allocated for housing under Policy HG01 of the Caerphilly Local Development Plan. The note will summarise the evidence, which demonstrates how the deliverability of sites has been considered through the process. This evidence base comprises:

- **SB81** Deposit LDP - Appendices to Written Statement (Appendix 20)
- **SB44** Background Paper 14 – Candidate Site Assessment Methodology
- **LA48** Joint Housing Land Availability Study 1st April 2009
- **LA46/LA47** Update on Planning consents December 2009/March 2010
- **SB33** BP6 Supplementary Paper 2 - Housing Site Categorisation Exercise
- **SB34** BP6 Supplementary Paper 4 – Affordable Housing Viability Assessment

3.2 This clarification note is supplemented by **MA2.2** Deliverability of Allocated Housing Sites – Planning Status, which responds to site-specific concerns raised by participants of Hearing Session 2 on the deliverability of housing sites where planning consents had not been implemented or where Section 106 Agreements have not been signed. The paper specifically identifies the reasons as to why Section 106 Agreements on the sites identified have been delayed and the anticipated timescales for completion.

3.3 In addition, **MA2.3** Deliverability of Allocated Housing Sites – Constraints, has been prepared to address the comments raised by participants on the constraints identified on specific sites. This note should be read in conjunction with MA2.2 and MA2.3 as these form part of the evidence base demonstrating that sites are deliverable.

Delivery and Implementation

3.4 The anticipated delivery and implementation of allocated housing sites is set out within Appendix 20 of SB81 Appendices to Written Statement. This indicates that in general housing allocations are expected to be delivered by the private sector (including Registered Social Landlords). It is recognised in the Appendix that the ability of the private sector to deliver the allocations in the plan is influenced by external economic circumstances. It is highly likely that the delivery of housing completions will vary considerably over the 15-year period of the Plan.

Candidate Sites Methodology

Level of Constraint

3.5 The approach used to assess candidate sites is set out in **SB44** Background Paper 14 – Candidate Site Assessment Methodology. Sites submitted through the candidate sites process were subject to a robust assessment comprising an initial planning assessment, which assessed sites against broad planning principles, followed by an expert assessment considering highways, ecology, landscape, drainage and environmental health issues.

3.6 Sites that passed the expert assessments were considered against the eight component parts of the strategy. The Council has sought the views of appropriate external consultation bodies including Western Power Distribution, Welsh Water, Wales and West Utilities, Countryside Council for Wales, CADW, Gwent Police,

South Wales Fire and Rescue Service, Environment Agency and Glamorgan and Gwent Archaeological Trust on those sites deemed suitable for further consideration in order to identify any constraints to development.

3.7 The precautionary approach was used in relation to flooding with the LDP seeking to locate development away from the flood plain. A number of sites have therefore been ruled out on flood risk grounds. This is explained in **SB44** BP13 Broad Level Flood Risk Assessment. In a small number of instances where sites in Zone C of the flood plain have been allocated this is only where the site can be justified in accordance with TAN 15: Development and Flood Risk i.e. the site is required to sustain an existing settlement, it is brownfield and it can be demonstrated that the consequences of flooding can be acceptably managed.

3.8 Consultation was also undertaken with the Council's education department in order to examine whether the local schools within the catchment area had capacity to accommodate additional pupils.

3.9 The sites that are subject to significant constraints as identified through the assessment process have not been taken forward as allocations where it is considered that the level of constraint is so severe that it is not considered that it can be overcome as the allocation of such sites would not be deliverable. It is important to note, however, that, given the topography of the valleys settlements in the County Borough and the nature of sites available, there are no sites that are completely free of constraints. However, the approach taken in the site selection process is to allocate those sites that have the least constraints where such sites also accord with the LDP strategy. This approach is set out within Section 7.6 of Background Paper 14.

UDP Sites

3.10 It is important to note that the Council has not simply carried forward allocations from the Unitary Development Plan. Rather, the approach taken was to reassess these sites in line with the candidate sites criteria. As part of this reassessment 5 undeveloped UDP sites were not taken forward as allocations in the LDP due to the assessment process identifying a range of constraints including access, flood risk and poor compatibility with the LDP strategy. The sites that have been carried forward are those that are realistically likely to be delivered within the plan period based on the evidence base.

Landowner/Developer Promotion of Sites

3.11 It is also important to recognise that the sites allocated in the plan primarily represent those that have been promoted by landowners through the candidate sites process, those sites that have been identified as having developer interest in them in the past and those sites that have been granted planning consent for housing. The fact that sites have been promoted in this manner clearly demonstrates that landowners and developers are committed to seeing the sites in question developed.

Utilities Constraints

3.12 Consultation with the statutory undertakers has indicated that a small number of sites are constrained by insufficient capacity in the networks. Seven sites have been identified as being located in areas where part of the public sewerage network suffers from hydraulic overloading. The sites include 4 in the HOVRA (two have which have addressed the network issue as part of planning consents), 2 in the NCC (one has been addressed through a planning consent) and 1 in the SCC (Bedwas Colliery).

3.13 Dwr Cymru Welsh Water (DCWW) have identified that no regulatory improvements were planned in the Capital Investment Programme (Asset Management Programme 4) that was available at the time of plan preparation. Information regarding the future location of sites was provided in time for them to be included within the AMP5 bid (2010-2015) so it is anticipated that some improvements will be undertaken as part of this programme. Even if not, the Council have advised DCWW that these should also be considered for inclusion in the AMP6 bid programme (2015-2020).

3.14 Should no improvements to the sewerage capacity be undertaken in advance of the site being developed, developers may need to fund the essential improvements. This will ensure that the timescales for sites coming forward will not be unduly constrained by programmes for improvements. Whilst there will clearly be a cost involved in upgrading the network, the exact financial contribution will not be known until planning application stage when appropriate hydraulic modelling can be undertaken.

3.15 It is also the case that the load generated from 5 housing sites may require the reinforcement of the gas network. An element of this reinforcement may be chargeable to the developer.

3.16 The sites that are constrained by sewerage and gas network capacity are identified in Appendix 7 of the LDP. The plan has sought to be transparent in identifying the nature of constraints on sites to ensure that these constraints are given due consideration at the early stages of the design of any scheme.

Joint Housing Land Availability Study

3.17 The latest published Joint Housing Land Availability Study (JHLAS) for 1st April 2009 (**LA48**), which has been agreed by the HBF as well as other members of the JHLAS group indicates that there are 26 sites (approximately one third of all allocations) that have units categorised in the 5-year land supply in addition to the allocated housing sites that were completed as of the base date of that study (HG1.21 YGG Cwm Rhymni and HG1.44 Land at Ty Pwll). This is an indication that a significant proportion of sites are considered by the housebuilding industry to be deliverable within the short term.

3.18 It should be noted that, in line with the guidance in TAN 1, only sites with a valid planning consent or that are allocated in an adopted development plan² have been included within the JHLAS site schedule. Any housing sites allocated in the LDP that do not have the benefit of a valid planning consent for housing or that were not also allocated in the UDP will not be listed within the study and will not therefore have been considered by the Group.

3.19 The Update of Planning Consents provided in December 2009 (**LA46**) and updated in March 2010 (**LA47**) provides a further indication of the deliverability of sites. The latest position is summarised in the Table below, where it will be noted that 46 sites (62% of all units) are already subject to a planning consent (in some cases subject to a Section 106) or have had a planning application submitted on them, indicating that the allocated sites have developer interest in them.

² It has been agreed by JHLAS Group members that that the Caerphilly UDP housing sites should be included in the study even though it has not been adopted as UDP has been through all the formal stages leading to adoption and has been approved for development control purposes.

	Number of sites	Number of units	% of all units
Planning consent or application	46	3990	62
No Planning consent	28	2438	37

3.20 Whilst it is noted that 28 sites do not currently have consent or an application submitted on them (37% of all allocations) this is reflective of the fact that there are still 11 years of the plan period remaining and it would not be expected that all sites would have planning consent this early in the plan period. Clearly, the fact that sites do not have planning permission at the present time does not mean they are not deliverable. Rather, it is anticipated that they are likely to come forward later within the plan period. It is important to remember that in order to make sufficient housing provision across the 15-year period a range of sites have been provided which are anticipated to come forward at different points in the plan period. The anticipated timescale for the delivery of sites is highlighted in the Housing Site Categorisation Exercise as discussed below.

Housing Site Categorisation Exercise

3.21 The Council met with the HBF and WAG in May 2009 to seek to provide an agreed statement of when sites were likely to come forward within the plan period. A number of housebuilders were invited to the meeting though none actually attended, although the HBF subsequently discussed sites with its members. The record of this meeting is set out within **SB33** BP6 Supplementary Paper 2 - Housing Site Categorisation Exercise.

3.22 The classification of sites in the plan was broadly reflective of the format of the Joint Housing Land Availability Study (JHLAS), with sites being categorised on the basis of which of the three five-year blocks of the plan period sites are likely to come forward. As part of the exercise a paper was circulated to participants setting out the methodology and terms that all parties should adhere to. In order to be consistent with the JHLAS methodology, it was considered appropriate to examine:

- whether the site has valid planning consent;
- the availability of necessary infrastructure;
- whether there is a realistic prospect of the site being sold for development
- where the land is not already owned by developers or a public body with its own firm plans for building;
- the financial viability of development; and
- any other constraints to development.

3.23 In light of discussions between the HBF and its members after the exercise on the categorisation of sites, concerns were raised in respect of only three sites:

- Navigation Colliery – this site has subsequently been deleted as part of Focused Change FC38
- Waterloo Works – this site is considered to be deliverable as £12 million has been spent on remediating the land and an outline planning application for 545 units has been approved subject to the signing of a Section 106 agreement
- Bedwas Colliery – there is recognition that the site has a number of constraints but the Council believe it will come forward in the lifetime of the plan with public sector funding for its remediation.

3.24 It is recognised that whilst no formal agreement on the categorisation of housing sites between all members of the group was reached, the HBF supported the principle of the exercise and only raise concerns in respect of the deliverability of three sites, two of which the Council believes can be delivered within the plan period up to 2021 and the third of which is recommended for removal as a housing allocation.

Affordable Housing Viability Assessment

3.25 An Affordable Housing Viability Assessment (AHVA) has been undertaken as set out in **SB34** BP6 Supplementary Paper 4 in accordance with **SEW15** Guidance on Preparing Affordable Housing Viability Studies, which was prepared by Three Dragons on behalf of the South East Wales Strategic Planning Group. Whilst the focus of this work was to consider how much affordable housing could viability be delivered, it also provides important conclusions on the viability of developments in the different housing markets in the County Borough.

3.26 The AHVA tested notional 1 hectare sites at an average density of 35 dwellings per hectare in each of the 6 housing market areas. Notional sites were tested rather than specific allocations in the plan as the level of information available for actual sites (i.e. number of units, type of units, abnormal costs etc) will not normally be available until a planning application is submitted. Furthermore, notional testing was appropriate in order to set area specific policies for windfall sites as well as allocated sites.

3.27 The AVHA used the most up-to-date data from the Building Cost Information Service (BCIS) on a local authority basis. The data therefore takes into account past tender price build costs from developments that have taken place in the County Borough, which have primarily been on brownfield sites. The underlying cost assumptions are therefore more reflective of developing brownfield sites than greenfield sites, therefore factoring in brownfield costs into the determination of viability.

3.28 The primary data source for BCIS data is from developments by Registered Social Landlord (RSL). The requirement for RSLs in Wales to build to Code for Sustainable Homes Level 3 have been in place for some time and therefore build costs would be reflective of meeting Code Level 3. These higher build costs have therefore been used to demonstrate the likely build costs of all new dwellings as the requirement for applications of 5 or more dwellings to meet Code for Sustainable Homes Level 3 and obtain 6 credits under Ene1 – Dwelling Emission Rate has been in place since 1st September 2009 and will be a requirement for new development.

3.29 The Viability Assessment has also factored in the costs of provision of other Section 106 Agreements, specifically highways, leisure and education based upon past levels of contribution secured.

3.30 The findings of the AHVA has indicated that development would be viable in each of the sub-market areas tested with variable levels of affordable housing and other planning obligations. In the lower value housing market areas, the use of Social Housing Grant can be used to increase the amount of affordable housing provided.

3.31 The purpose of the AHVA is to provide an indication of the target of affordable housing that would be required in the various sub-areas. Paragraph 2.29 of the **SB80** LDP Written Statement indicates that the targets should be treated as indicative as, at planning application stage, site-specific requirements will depend on current

market conditions having regard for the most up to date Local Housing Market Assessment, recent Viability Assessment and information from the Council's Housing Division. This will ensure that there is sufficient flexibility to consider any abnormal costs associated with the development to ensure that affordable housing requirements do not stifle development. This flexibility is a key part of ensuring that the development of allocated sites can be delivered.

Evidence of Deliverability of brownfield sites in the Southern Connections Corridor

3.32 Particular concerns have been raised regarding the viability of the promotion of primarily brownfield sites in the Southern Connections Corridor. This has been a key consideration in the determining the deliverability of sites within this strategy area. The Viability Assessment has indicated that even taking into account the potential higher build costs associated with brownfield development as taken from the BCIS data, development is still viable in both the Caerphilly Basin area (which is the highest value market area in the County Borough) and the Lower Islwyn area.

3.33 Key evidence of deliverability of brownfield sites in the SCC can be seen from an analysis of the types of sites that have been developed in the recent past, which is explained in **SB61** Council Consideration of Representations- Volume 5. The approach in the LDP, which seeks to consolidate development within existing settlement boundaries on brownfield sites is a continuation of the strategy for the Area of Consolidation in the Caerphilly Council Approved Unitary Development Plan 1996 – 2011. This is considered to have been successful in achieving the aims of the Plan, the most significant example being the remediation of the former Penrhos tip, which was one of the most contaminated sites in Wales, which is currently being developed for housing. This has been remediated by the private sector, despite the Council not considering that the site was deliverable within the Plan period.

3.34 Whilst it is accepted that a small number of sites in the SCC (most notably Bedwas Colliery) may have abnormal costs associated with their former use such as contamination, the level of constraint on other allocated housing sites will be less, as highlighted in **SB81** Appendices to the Written Statement (Appendix 7) and **MA2.3** Deliverability of Allocated Housing Sites – Constraints. However, should significant abnormal costs be identified, the plan is sufficiently flexible as to allow these to be taken into account at planning application stage when exact costs are known to ensure that a deliverable development can go ahead.

Section 4 – Strategic Policies

Policy SP7 Planning Obligations

4.1 In response to discussions held during Hearing Session 2 the Inspector asked the Council to consider including reference within the reasoned justification of Policy SP7, to the need to consider the viability of schemes and the impact that abnormal costs associated with brownfield development may have on the level of planning obligation that might be sought.

4.2 Policy SP7 provides an indication of the types of planning obligations that the Council will seek to negotiate where they are necessary to remove obstacles to planned development. The reasoned justification to Policy SP7 however does not recognise that there is a need to consider the viability of a scheme during the planning obligation negotiation process.

4.3 The Council recognises that the potential abnormal costs associated with the re-use of some previously developed land may impact on the levels of obligation that can be realistically sought through planning obligations. In order to recognise this, it is proposed that the reasoned justification of Policy SP7 be amended to read:

*“1.66 New development has the potential to increase pressure on existing community infrastructure and facilities such as transportation networks, schools, lifelong learning facilities, open space and other facilities. The provision of adequate infrastructure and services are a prerequisite of development taking place, as it is crucial for the environmental, social and economic sustainability of the County Borough. Where appropriate, the Council will seek obligations to mitigate against the effect of development. **In line with national guidance the Council will ensure that the level and scale of obligation is necessary, directly related to the development and fairly and reasonably related in scale and kind.**”*

*1.67 **In the case of previously used land, the Council will take into consideration abnormal costs associated with the redevelopment of a site when negotiating the level of planning obligation to be sought. Where a developer considers that the level of obligation sought may affect the viability of a development proposal to an unacceptable degree the Council will require the developer to provide sufficient evidence to support this position as part of the planning obligation negotiation process.**”*

Policy SP16 Total Housing Requirement

4.4 In response to discussions held during Hearing Session 3 the Inspector asked the Council to consider revising policy SP16 to indicate that the plan makes provision for more land than that stated in the existing policy. It is considered appropriate to include this work within the paper for session 2 given the inter relationship with issues discussed at session 2.

4.5 At present policy SP16 states:

“Total Housing Requirements

SP16 The Council has made provision for the development of 8,625 new dwellings in the County Borough between 2006-2021

(Key components met 1, 2, 3, 4, 5 & 8)

1.83 The Local Development Plan ensures that sufficient residential land is made available to meet the future needs of communities for both market and affordable housing. On the basis of sites allocated for housing under Policy HG 1, as well as completions, units under construction and allowances for windfall sites, small sites, conversions, demolitions and bringing empty properties back into beneficial use, the Plan makes provision for **10,024 dwellings**. This represents 1,399 (14%) residential units more than the 8,625 units required allowing for choice and flexibility. The assumptions used to underpin this housing land provision are set out in the Population and Housing Background Paper.

1.84 Opportunities for residential development will be distributed across the whole County Borough, in line with the role and function of individual settlements. In particular, housing development will be targeted at settlements with good rail and bus services and also former mining villages that require additional housing in order to promote and sustain them as viable residential areas. Furthermore, brownfield sites will be promoted in favour of greenfield sites where appropriate.”

4.6 The thrust of the discussion in respect of this policy relates to the fact that the plan makes provision for 10,024 dwellings over the plan period whilst the policy itself makes reference to the housing requirement figure for the plan period of 8,625.

4.7 For reasons of clarity the Inspector suggested that a revised wording for SP16 be submitted for consideration. In this context it is suggested that the policy be amended to read:

“Total Housing Requirements

SP16 The Council has made provision for the development of up to 10,024 new dwellings in the County Borough between 2006 and 2021 in order to deliver the 8625 new dwellings required to meet the moderate growth strategy. This 14% over provision allows for flexibility and choice.

1.83 The Local Development Plan ensures that sufficient residential land is made available to meet the future needs of communities for both market and affordable housing. On the basis of sites allocated for housing under Policy HG 1, as well as completions, units under construction and allowances for windfall sites, small sites, conversions, demolitions and bringing empty properties back into beneficial use, the Plan makes provision for **10,024 dwellings**. This represents 1,399 (14%) residential units more than the 8,625 dwellings required **to meet the dwelling housing requirement identified by the moderate growth strategy. This allowance provides for choice and flexibility.** The assumptions used to underpin this housing land provision are set out in the Population and Housing Background Paper.

1.84 Opportunities for residential development will be distributed across the whole County Borough, in line with the role and function of individual settlements. In particular, housing development will be targeted at settlements with good rail and bus services and also former mining villages that require additional housing in order to promote and sustain them as viable residential areas. Furthermore, brownfield sites will be promoted **over** greenfield sites where appropriate.”

APPENDICES

SOUTH EAST WALES STRATEGIC PLANNING GROUP

Officer Meeting

Tuesday 17th November 2009

Extract of Minutes

5 SEWSPG response to the 2006 Welsh Assembly Government Population and Household Projections

Prior to the meeting a copy of the final draft regional response paper to the WAG projections prepared by a SEWSPG sub group was circulated to the wider group for comment. BS noted that she had received no comments on the paper which would indicate that the group is generally comfortable with the paper and its recommendations which are set out below:

1. SEWSPG should monitor each individual local authority's figures in their LDPs in order to examine the wider regional implications.
2. SEWSPG endorse the "bottom up" (local data) methodology used by WAG in calculating the 2006 -based projections.
3. SEWSPG recognise that the projections are only trend based and may only materialise if the trend-base assumptions remain valid.
4. SEWSPG should ask WAG to extend the 5 year trend assumption period to a 10 year trend at the same time as data becomes available therefore incorporating demographic changes in recent trends.
5. SEWSPG should ask WAG to set up "local authority" and "other users" feedback sessions on the 2006-based projections before undertaking the 2008-based projections.

The paper and recommendations were agreed by the group. It was also agreed to take forward recommendation 1 of this paper in a further regional planning implications paper to support local authorities in defending their LDP figures. This paper will enable SEWSPG to monitor each individual local authority's LDP figures and test these against the aims of the Wales Spatial Plan in terms of the region.

It was agreed that GA would convene a sub group to explore the feasibility of such a paper. BS, RP and RT expressed an interest on joining GA on the sub group.

Action: GA to convene a sub group meeting to explore the feasibility of producing a further paper to take this work forward.

Explanation of Chelmer Formula

Chelmer Formula: $D=H [1-p/100(1-1s)]/(1-v/100)$

2001 Census Definitions

H = Household

- one person living alone, or
- a group of people (not necessarily related) living at the same address with common housekeeping- sharing either a living room or sitting room, or at least one meal a day.

D= Dwelling

- A dwelling can either consist of
- One household space (an unshared dwelling) or
- Two or more household spaces (a shared dwelling).

Household Space is defined as being in a shared dwelling if:

- It is part of a converted or shared house,
- Not all the rooms (including bathroom and toilet, if any) are behind a door that only one household can use, and
- There is at least one other such household space at the same address with which it can be combined to form the shared dwelling.

If any of these conditions is not met the household space forms an unshared dwelling.

How to convert Households to Dwellings using the Chelmer Formula.

In order to convert households to dwellings the SEWSPG apportionment exercise applied the Chelmer Formula as follows:

Table 1: New dwelling Requirement for Caerphilly 2001-2021 based on WAG Regional Household Projection shared by LAs DRAFT Provisional apportionment May 2006

Chelmer Ref	Topic Factor	Source	Caerphilly
	Option a): 2001 Dwellings (Council Tax)	ONS	72,386
H	Households at 2021	NAW Reg Projection Shared by LPAs	83,040
P/100	Sharing Rate (% of households sharing accommodation)	2001 Census	0.02
S	Sharing Factor (Households per shared dwelling)	2001 Census	2.96
V	Vacancy Rate	2001 Census	3.72
D	2021 Implied Dwelling Requirement	Basic Chelmer Formula applied namely: $D=H[1-p/100(1-1s)]/(1-v/100)$	86,238
	Option A: Additional Dwelling Requirement 2001-2021	2021 less 2001	13,852
	Option A: Additional Dwelling Requirement 2001-2021 per year	Requirement divided by 20 years	693

Note: Does not take into account demolitions (need to replace old stock), change of use losses, residential to residential conversions, or change of use gains expected over the period.

Population Scenarios

Outlined below are the assumptions the Council have used for the various population scenarios. The various methodologies to arrive at the plausible population and household levels are also indicated. It is worth noting that when rounding is applied to the various calculations the population and household figures are consistent.

Population Scenarios

Moderate Growth Scenario				Population 2021
Base Population				171,300
Assumptions for Natural change	246	15		3690
Assumptions for Net In Migration	165	15		2475
Total Population				177,465

High Growth Scenario				Population 2021
Base Population				171,300
Assumptions for Natural change	246	15		3690
Assumptions for Net In Migration	330	15		4950
Total Population				179,940

Low Growth Scenario				Population 2021
Base Population				171,300
Assumptions for Natural change	246	15		3690
Assumptions for Net In Migration	0	15		0
Total Population				174,990

Moderate Growth Scenario				Rounded to:	Moderate Growth Scenario	Rounded to:	Rounded to:
Households 2006				71,447	Total Population		177,500
Household increase	575	15		8625	Less population in residential establishments		1087
Households 2021				80,072	Residential population		176,413
Population - Multiplied by Average Household Size		2.2		176,399	Average Household size		2.2
Plus Population in residential establishments				1,087	Households 2021		80078.53
Total Population				177,486	Less Households in 2006		71,447
					dwelling requirement (ratio 1:1)		8,632
							8625
High Growth Scenario							
Households 2006				71,447	Total Population		180,000
Household increase	650	15		9750	Less population in residential establishments		1087
Households 2021				81,197	Residential population		178,913
Population – Multiplied by Average Household Size		2.2		178,877	Average Household size		2.2
Plus Population in residential establishments				1,087	Households 2021		81213.35
Total Population				179,964	Less Households in 2006		71,447
					dwelling requirement (ratio 1:1)		9,766
							9750
Low Growth Scenario							
Households 2006				71,447	Total Population		175,000
Household increase	500	15		7500	Less population in residential establishments		1087
Households 2021				78,947	Residential population		173,913
Population - Multiplied by Average Household Size		2.2		173,920	Average Household size		2.2
Plus Population in residential establishments				1087	Households 2021		78943.71
Total Population				175,007	Less Households in 2006		71,477
					dwelling requirement (ratio 1:1)		7,467
							7,500

Assessment of the Plan against the Housing MIPPS

Para	Requirement	How has this been achieved in the LDP
<p>9.1.2</p>	<p>Local planning authorities should promote:</p> <ol style="list-style-type: none"> 1. Mixed tenure communities 2. Development that is easily accessible by public transport, cycling and walking, although in rural areas required development might not be able to achieved all accessibility criteria in all circumstances 3. Mixed use development so communities have good access to employment, retail and other services 4. Attractive landscapes around dwellings, with usable open space and regard for biodiversity, nature conservation and flood risk 5. Greater emphasis on quality, good design and the 	<ol style="list-style-type: none"> 1. Mixed tenure communities will be promoted through the application of affordable housing policy CW14. In areas with high levels of social housing private sector housing would diversify the housing stock tenure. 2. All settlements within which housing allocations have been made are served by rail services and/or bus services. In selecting sites for allocation, where more than one site was available proximity to facilities and also rail facilities has been taken into account. The SA/SEA process which assessed housing allocations on a site-by-site basis had regard to accessibility by modes other than the car. 3. Significant sites in the SCC have been allocated for mixed use – Castlegate, Bedwas Colliery. Onsite open space will be anticipated on larger sites. Many sites already relate well to existing development (retail and employment opportunities). 4. Requirements for leisure provision are set out in Appendix 7. Protection policies for open space CW10 and Natural Heritage policies (CW8 – SLA, VILLS, SINC) protect surrounding landscapes areas where appropriate. Nature conservation and biodiversity has been a key factor in the site selection process but has been balanced against demand for housing in order to diversify the housing stock and reflect the role and function of settlements. Flood risk has also been a key consideration as the precautionary principle has been adopted. 5. This is a matter of design rather than the principle of allocation

<p>9.1.3</p>	<p>creation of places to live that are safe and attractive</p> <p>6. The most efficient use of land</p> <p>7. Well designed living environments, where appropriate at increased densities</p> <p>8. Construction of housing with low environmental impact that especially maximises energy efficiency and minimises the use of energy from fossil fuel sources using renewable energy technology where appropriate</p> <p>9. 'Barrier free' housing developments, for example built to Lifetime Homes standards</p>	<p>but at planning application stage it will be a key consideration. Policy CW5 on General Design Considerations is proposed for deletion but this is because it is covered sufficiently in national planning policy.</p> <p>6. The re-use of brownfield land is a key element of the site selection process and the allocation of sites within the settlement boundary rather than settlement extensions. Indicative site capacities have been provided based on average densities. Policy CW17 indicates that development proposals will not be permitted if they prejudice the implementation of wider comprehensive development or constrain the development of any adjacent site for its allocated use.</p> <p>7. Design is covered sufficiently within national planning guidance. Indicative densities are provided based on averages but higher densities can come forward as appropriate as policies are sufficiently flexible to allow this.</p> <p>8. This was originally covered in Policy CW1, although this has been deleted as it repeats national guidance in the MIPPS on planning for Sustainable Buildings and TAN 22.</p> <p>9. This is covered in national policy in TANs 12 and 22 in terms of inclusive design. This is a matter for detailed design.</p> <p>10.</p>	<p>Full consideration has been given to the community strategy in the preparation of the plan with objectives being derived from the community strategy. The LHS has been developed alongside the LDP using the same evidence base – the LHMA. The LHS contains a chapter on the land-use planning framework.</p>
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<p>9.1.4</p>	<p>Local authorities' planning should ensure that development plan policies are based on an up-to-date assessment of the full range of housing requirements across the plan area over the plan period. Local authorities' planning and housing functions must combine in partnership with local stakeholders, including private house builders, to produce LHIMAs. LHIMAs must include monitoring so that responses to changing housing requirements can be reflected in updated development plans and housing strategies</p>	<p>An LHMA has been carried out in accordance with the LHMA Guide and in consultation with key stakeholders. The LHMA include a section on updating and annual updates will be commissioned.</p>
<p>9.2.1</p>	<p>In planning the provision for new housing, LPAs must work in collaboration with Housing authorities, RSLs, house builders, developers, land owners and the community and take account of the following:</p> <ol style="list-style-type: none"> 1. People, Places, Future – The Wales Spatial Plan; 2. Statutory Code of Practice on Racial Equality in Housing – Wales; 3. The Assembly Government's latest household projections; 4. Local housings strategies; 	<p>Consultation has been carried out in line with the DA and landowners engaged through the candidate site process.</p> <ol style="list-style-type: none"> 1. The strategy has been formulated in line with the WSP and therefore housing sites have been derived from this 2. Reference made to this in Background Paper 6 (BP6). A diverse range of people including hard to reach groups have been consulted on the LDP in line with the Delivery Agreement. The LHMA, which forms part of the evidence base, considers the needs of BME groups and Gypsies & Travellers. 3. The 2003 sub-national household projections were the most recent projections at the time the Deposit LDP was prepared and these formed part of the evidence base. The 2006 based household projections were published after the LDP was placed on Deposit, although the Council has responded to them in SB32 BP6 Supplementary Paper 1 and ED13 BP6 Supplementary Paper 6. 4. The Local Housing Strategy has been prepared jointly with the LDP using the same evidence base from the LHMA.

<p>5. Community strategies;</p> <p>6. Local housing requirements (needs and demands);</p> <p>7. The needs of the local and national economy</p> <p>8. Social considerations (including unmet need)</p> <p>9. The capacity of an area in terms of social, environmental and cultural factors to accommodate more housing</p>	<p>5. The objectives of the plan have been derived from the Community Strategy</p> <p>6. The findings of the LHMA and a policy based assessment of local requirements have informed needs and demands as explained in BP6</p> <p>7. Economic factors can change over the lifetime of the plan but current conditions have an impact on housing requirements over the long-term view has been taken on housing requirements over the plan period rather than simply considering short economic trends. The level of growth has been considered alongside employment provision to ensure that sufficient land provision is made to accommodate an increase in population.</p> <p>8. Maximising affordable housing is key consideration in the LDP, as is achieving mixed communities. However, this needs to be balanced against environmental considerations</p> <p>9. Social capacity is addressed through policies to encourage mixed tenure communities balanced with appropriate leisure and community facility and protection/allocations. Key service providers such as the health board and education departments were consulted in the Plan to ensure that sufficient capacity was available within existing services and additional allocations in the plan have been identified as appropriate to reflect the location of new development (e.g. new schools). Environmental issues were key factors in site selection process and SEA/SA. Cultural capacity is not a key issue as Caerphilly is not a predominately Welsh speaking area. The importance of achieving mixed communities is promoted.</p>
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	<p>10. The environmental implications, including energy consumption, greenhouse gas emissions and flood risk</p> <p>11. The capacity of the existing or planned infrastructure</p>	<p>10. Energy consumption and greenhouse gas emissions – considered through MIPPS on Planning for Sustainable Buildings. Flood risk considered in site selection process.</p> <p>11. Statutory undertakers consulted (Dwr Cymru Welsh Water, Western Power Distribution, Wales and West Utilities etc) and where constraints were identified proposed improvements have been highlighted in Appendix 7 of the LDP. Internal consultation also carried out on drainage, highways, education etc. Where constraints could not be overcome, sites were not taken forward.</p>
9.2.2	<p>The latest WAG projections for Wales and Sub-national household projections should form the starting point for assessing housing requirement. LPAs should work together to apportion projections or agree regional policy based projections. Where LPAs seek to deviate by using their own policy-based projections they justify the reason.</p>	<p>The 2003 sub-national household projections were the latest projections available when the LDP was placed on Deposit. These regional projections were apportioned to authorities in South East Wales as set out in SEW7 as the starting point for assessment. The paragraph allows LPAs to deviate from the projections by using policy-based projections where this is justified. This justification is set out in SB31 BP6, SB32 BP6 Supplementary Paper 1 and BP6 Supplementary Paper 6. Consideration of the 2006-based projections, which were made available after the Deposit LDP was published, is set out in SB31 BP6, SB32 BP6 Supplementary Paper 1 and BP6 Supplementary Paper 6</p>
9.2.3	<p>LPAs must ensure that sufficient land is genuinely available or will become available to provide to provide a 5-year supply of land for housing</p>	<p>This will be monitored through the Joint Housing Land Availability Study process, which requires the local authority to take steps to increase the supply of housing land. Monitoring of this is also including within the LDP Monitoring Framework.</p>
9.2.4	<p>LPAs must develop policies to meet the circumstances evident in specific locations.</p>	<p>The key local circumstance in Caerphilly is affordable housing need. Affordable housing policies are in place to maximise delivery.</p>
9.2.5	<p>LPAs should devise a settlement strategy, which establishes housing policies in line with their LHS and spatial pattern of housing development balancing social, economic and environmental needs. It should be developed and integrated</p>	<p>The LDP Strategy sets out a hierarchy of settlements based on their role and function. This takes into account social, economic and environmental needs. An SA/SEA has informed the strategy.</p>

	as part of an overarching strategy in the development plan. The strategy should be informed by an SA	
9.2.6	LPAs should address the scope and potential for rehabilitation, conversion, clearance and redevelopment when considering suitable sites for housing.	This has been a key consideration of the site selection process and the strategy itself, which seeks to exploit brownfield opportunities where appropriate.
9.2.7	Any proposals for new settlements should be promoted and fully justified.	There are no proposals for new settlements in the LDP.
9.2.8	In identifying sites for housing, LPAs should follow a search sequence starting with the re-use of previously developed land and buildings within settlements, then settlement extensions and the new development around settlements with good public transport links	This has been a fundamental part of the site selection process. Sites have been considered on a strategy area and individual settlement basis as set out in ED31 Background Assessment of Candidate Sites and SB45 Candidate Site Assessment Methodology. Where there is more than one suitable site available within a settlement, those best complying to the search sequence have been taken forward.
9.2.9	LPAs should consider the following criteria in deciding which sites to allocate for housing: <ol style="list-style-type: none"> 1. The availability of previously developed sites and empty or under-used buildings and their suitability for housing use. 2. The location and accessibility of potential development sites to jobs, shops and services by modes other than the car, and the potential for improving such accessibility 3. The capacity of existing and potential infrastructure, including public transport, water and sewerage, other utilities and social infrastructure (such as schools 	<ol style="list-style-type: none"> 1. This has been a key factor in the site selection process 2. The consideration of sites against the role and function will be a factor in terms of provision of services. In determining which sites to allocate there was a choice of suitable sites, accessibility and proximity to public transport have been key features in the selection of sites. This has also been a factor in the SA/SEA. Improving accessibility at planning application stage is considered in SP22 Transport Requirements for Development and CW2 Sustainable Transport, Accessibility and Social Inclusion 3. Infrastructure providers have been consulted through the process. Where capacity constraints were deemed so significant as to prevent a site coming forward, sites have not

	<p>and hospitals) to absorb further development and the cost of adding further infrastructure.</p> <p>4. The ability to build sustainable communities to support new physical and social infrastructure and to provide sufficient demand to sustain appropriate local services and facilities</p> <p>5. The physical and environmental constraints on development of land, including, for example, the level of contamination, stability and flood risk taking into account that such risk may increase as a result of climate change and the location of fragile habitats and species, archaeological and historic sites and landscapes</p>	<p>been allocated for housing. However, where it is considered that capacity constraints can be overcome, mitigation measures are set out in Appendix 7. There have been recent improvements to capacity on the rail network and increased service provision. Furthermore, there have been a number of new park and rides (Caerphilly, Aber, Newbridge) and a number of others proposed (TR4 – Rhydney, Bargoed, Pengam, Llanbradach).</p> <p>4. This is a fundamental element of the strategy in targeting development to reflect the role and function of settlements. This is particularly relevant in diversifying the housing stock and sustaining local communities. New infrastructure (e.g. schools, roads etc) are promoted where they can be sustained and funded appropriately.</p> <p>5. This has been considered through the site selection process. *Contamination was considered as part of the Environmental Health assessment as part of the candidate site process and where there is need for ground investigation this is identified in Appendix 8. It has not been the approach to avoid allocating potentially contaminated sites, as this would not comply with the brownfield approach. The LA has examples of where contaminated sites have been brought forward – Cray Valley (Waterloo) and Castlegate (Penrhos). *Land stability – the legacy of coal mining is considered as part of the coal referral pilot project. All allocated sites were assessed as part of it (Jan 2009) in ED30. A Coal Mining Risk Assessment will need to be undertaken at planning application stage. *Flood risk – this has been a key consideration in the site selection process as set out in SB44 Broad Level Assessment. Sites have only been allocated where they adhere to the requirements of TAN 15. *Fragile habitats and species – this was considered as part of the expert Countryside Assessment</p>
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	<p>6. The compatibility of housing with neighbouring established land uses which might be adversely affected by encroaching residential development</p>	<p>*Archaeological and historic sites – Glamorgan and Gwent Archaeological Trust were consulted as part of the site selection process. Only a small number of sites (all with planning consent) are located on the edge of a conservation area. Only HG1.35 Penallta Colliery has listed buildings on site– these are integral to the overall design. No sites with SAMs on them</p> <p>*Historic landscapes – SLAs defined using landmap including historic layer. No housing sites are located within historic parks and gardens.</p> <p>6. Compatibility with adjoining uses was a key factor in the initial site assessment process as set out in SB45 Candidate Site Assessment Methodology.</p>
9.2.10	<p>Previously developed sites should be allocated before greenfield sites except where sites score poorly in relation to the criteria in 9.2.9</p>	<p>This approach has been followed. Not all brownfield sites have been allocated, particularly where there are specific constraints to development such as flood risk. In addition not all brownfield sites conform to other elements of the strategy such as the role and function of settlements and the promotion of resource efficient settlement patterns.</p>
9.2.11	<p>Policies should distinguish between sites to be retained for recreation, amenity or nature conservation and areas generally suitable for new development. Where substantial new housing is permitted, plans should include policies on open space provision.</p>	<p>The site assessments have been undertaken alongside leisure and SINC reviews. A policy on new open space is included in the Plan (Policy CW13).</p>
9.2.12	<p>Policies will need to cover the physical scale and design of new buildings, access, density and off-street parking. Strong pressure for development may give rise to inappropriately high densities if not carefully controlled. Local authorities should adopt a flexible approach to car parking standards.</p>	<p>Scale and design is a matter for TAN 12 on Design supported by SPG at a local level. Density is considered by policy CW3 on amenity – criterion B is specifically on over-development. Policy CW6 relates to design considerations including access. Parking standards set out in Policy SP24 and supported by an SPG on parking standards.</p>
9.2.13	<p>'Tandem' development should be avoided.</p>	<p>Covered by CW3 on amenity – over development</p>

9.2.14	Need for affordable housing is a material consideration that must be taken into account in formulating plan policies. The LHMA forms the evidence base. It is important that LAs understand the demand for sizes and tenures	The LHMA has formed the evidence base for policies in the plan. The specific requirements for the size and tenure of affordable housing will be determined on a site-specific basis using this evidence base.
9.2.15	Development plans must include an authority-wide target for affordable housing based on the LHMA and identify the expected contributions that the policy approaches identified in the development plan will make to meeting the target. The target should take account of the anticipated levels of finance available for affordable housing and the level of developer contribution that can be realistically sought.	A comprehensive target and planning system target is set out in Policy SP17. This is based upon limited public subsidy and the level of developer contribution that can realistically be sought.
9.2.16	LPAs should include site thresholds or a combination of thresholds and site-specific targets. LPAs should set thresholds above which a proportion above which a proportion of affordable housing will be sought on allocated and unallocated sites. Site specific targets will comprise an indicative affordable housing target for each residential site.	A threshold is set in Policy CW14 for allocated and unallocated sites. Whilst site-specific targets haven't been identified, area specific targets have been, which apply to all sites within a specific sub-market area.
9.2.17	LPAs may identify sites for up to 100% affordable housing based on criteria reflecting local circumstances set out in the development plan in the context of developing sustainable communities. Such sites are likely to be small in number and small in scale.	Two 100% affordable housing sites have been allocated where they were realistically likely to come forward. No other sites have been allocated as sites need to be deliverable and unless SHG is available, sites aren't likely to come forward for affordable housing. However, there is nothing in the policy to restrict other 100% sites coming forward.
9.2.18	Policies must indicate that an LA will seek to negotiate with developers and should state what the authority would regard as affordable housing and what arrangements it would expect to ensure that such housing remains reserved for those who need it.	The reasoned justification indicates that targets are indicative, demonstrating flexibility at planning application stage. It was not considered necessary to define what would be regarded as affordable housing as this would be repeating national planning guidance. The arrangements to ensure that units remain affordable will be discussed as part of SPG but this also links to the definition of affordable housing.
9.2.19	Residential mobile homes can make a contribution to overall	There are very few mobile homes sites in Caerphilly. The National Park

	housing provision. LPAs should consult the park homes industry about the provision of appropriate sites.	Homes Council have been consulted but no candidate sites were submitted and no representations were received.
9.2.20	LPAs are required to assess the accommodation needs of Gypsy families. In drawing up policies LPAs should consult with providers of social housing, G&T representative and landowners.	A G&T assessment has been carried out, although this did not undertake primary research. RSLs, Cardiff Gypsy Project, Gypsy Council (advised that they wanted to receive no further correspondence) and Friends and Families of Travellers have been consulted.
9.2.21	In planning for housing in rural areas, new houses in the countryside away from existing settlements must be strictly controlled.	This is covered by the CW17 on general locational constraints including what will be acceptable outside of settlement boundaries.
9.2.22	Rural exceptions sites must be considered to help ensure the viability of the local community. LPAs should refer to their up to date housing assessment or survey at the ward or rural settlement level to support policies. Policies should make clear that the release of small sites to meet local needs is an exception to general housing provision and is only for affordable housing.	Paras 9.2.21 and 9.2.22 refer to planning in rural areas. Caerphilly is not a rural authority as even though a large proportion of the County Borough is 'countryside' the population lives within defined settlements. Given that Caerphilly is not a rural authority it was not possible for a survey to be undertaken on a rural settlement level. The reasons why a policy is not considered appropriate is set out within SB31 BP6 and ED18 Maximising Affordable Housing.
9.2.23	Development plans should: <ul style="list-style-type: none"> - Quantify the housing requirement (both market and affordable housing); - Set an affordable housing target - Set out a settlement strategy - Allocate housing land on the basis of the search sequence specified in 9.2.8 and criteria in 9.2.9 - Include clear policy criteria against which applications for development of unallocated sites will be considered - Specify the circumstances in which previously developed sites would be deemed to perform so poorly that their use would not be favoured before that of a (particular) greenfield site 	<ul style="list-style-type: none"> - Total housing requirement is covered in Policy SP16, and the level of Affordable need is set out within the reasoned justification for Policy SP17 Affordable Housing Target SP17 - Set out in Policy SP17 Affordable Housing Target - Set out in Policy SP4 Settlement Strategy - This has been followed as set out in the SB45 BP14 Site Assessment Methodology Paper - Policy CW17 General Locational Constraints, CW3 Amenity - This has been considered as part of site selection process. A key component of the strategy is to 'exploit brownfield opportunity where appropriate'. But this must be balanced with the need to protect other uses i.e. employment/retail (sites protected under CW15/CW16). The consideration of windfall brownfield sites will

<p>9.3</p>	<p>Development Control and Housing</p>	<p>need to be assessed against policies of the plan including CW3 Amenity and CW17 General Locational Constraints.</p> <ul style="list-style-type: none"> - Include clear development control policies to guide the determination of applications, including guidance on design, access, density, off-street parking and open space provision for particular areas as appropriate. - Specify mechanisms to be used to monitor the take up of housing land - Include policies for affordable housing in areas where need has been identified, including any rural areas where exceptions sites will be considered - Include a policy to strictly control new housing in the countryside away from existing settlements or other areas allocated for development; - Include policies to indicate where developer contributions will be expected toward infrastructure, community facilities and affordable housing 	<ul style="list-style-type: none"> - Design (covered by TAN 12 but also in SP6 on place making), access (CW6 Design Considerations - Highways), density (CW3 Amenity), off-street parking (SP24) and open space provision (CW10 Protection of Open Space, CW13 Leisure and Open Space Provision) - Appendix 19 of the Written Statement and ED36 Draft Monitoring Framework - Areas specific targets (CW14). No rural exceptions policy as it is not considered necessary - General Locational Constraints (CW17)– development outside of settlements, Protection of Open Space (CW10), Protection of Community and Leisure Facilities (CW11), Use Class Restrictions - Business and Industry (CW15) and Use Class Restrictions - Retail (CW16) - SP7 Planning Obligations, CW13 Leisure and Open Space provision, CW14 Affordable Housing Planning Obligations
<p>These are matters to be addressed as part of a planning application.</p>			