

# CONSULTATION RESPONSE



**Response to Matters Arising Document - MA 2.1**

**10/06/2010**

## **Introduction**

This statement is a direct response to the Council's recently released document MA 2.1. In terms of our evidence on the housing requirement, this is provided within our response to the Deposit LDP, our position statement for the housing session (session 2) along with our comments made at that session, and is not repeated here. In light of this, this statement should be read in conjunction with all our evidence provided throughout the examination process.

## **1. Housing Apportionment**

1. Paragraph A.2 states that - *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.*

1.1 The HBF made strong objections to the apportionment at this workshop, stating that it did not properly take account of the necessary evidence to inform a sound apportionment of the household projections. Many other people at the workshop made similar comments. However, it is not clear how these comments were taken on board and they were certainly not reflected in the memorandum of understanding, which we do not support.

1.2 The explanation provided by the Council on how the apportionment was decided seems to relate solely to capacity and does not take account of what the actual population movements might be. Clearly if the population is projected to grow in a manner that would require additional capacity, then new housing sites need to be found and allocated.

1.3 Paragraph A8 states that the figures represent a 16% increase in completion rates over the average for 1991-2005. However, we do not believe it is appropriate make a comparison with this period, particularly when the years between 1991 and 1996 represent a period in the Council's history that they specifically wanted to change.

1.4 Again, there is still no explanation of what the authority plans to do with the balance of housing that would be left from the figure proposed within the SEWSPG apportionment and the figure

proposed within the Deposit LDP. We believe this needs to be explained and a strategy devised account for any balance left over.

## **2. Section B2**

2.1 Paragraph 4.4.11 makes reference to the SEWSPG figure being in line with the High Growth Strategy and assumes an increase in the net migration level from 120 to 330 persons per year. However as we stated within our Housing Session Position Statement, there is no evidence to state that the dwelling requirement figure for Caerphilly within the SEWSPG apportionment was based on a net migration assumption of 330 persons per year. Surely, if a net migration assumption of 330 persons per year was one of the components of change that informed the dwelling requirement for Caerphilly within the SEWSPG apportionment, given what the Council has stated within the various background papers supporting the LDP, they would not have considered that figure to be appropriate in the first place.

2.2 On the face of it, in terms of deviating from the SEWSPG apportionment figure, the Council seems to have assumed a figure for net migration they believe is not plausible to accept, then associated this with the SEWSPG apportionment figure and used it as the reason for not adopting the SEWSPG apportionment figure. In light of this, we believe the Council has still not sufficiently explained how the dwelling requirement figure for Caerphilly within the SEWSPG apportionment was chosen and therefore why it should differ from the dwelling requirement within the LDP, if both requirements are based on capacity, policy aspirations and the 2003 household projections.

## **3. Household to Dwelling Ratio**

3.1 Paragraph B3 states that there is no agreed ratio to convert households to dwellings. However, whilst we agree there are a number of ways this could be calculated, this does not mean it should not be attempted. It is recognised across all local authorities in Wales that number of dwellings present will be higher than the number of households for various reasons i.e. vacant stock, second homes etc. As such, it is the authority's responsibility to determine what the particular ratio is for Caerphilly, rather than to merely assume it is 1:1, because they have not attempted to calculate it. The council's assumption of a 1:1 ratio is not based on evidence and we believe the authority should undertake more work to establish what the household to dwelling ratio is within Caerphilly.

3.2 Paragraph D3 states that because the level of affordable housing need is so high, it will never be met in its entirety. Therefore, despite acknowledging that an increase in the overall housing provision will result in more affordable housing being provided, the council seems to be taking the stance that there is no point increasing the overall housing provision, because it will not resolve all the affordable housing need. However, the council's stance does not take account of the fact that increasing the housebuilding level within the LDP, in line with the 2006 WAG projections, would help to deliver more affordable housing and make more of a dent in the overall level of affordable housing need. As stated by the clarification letter released by the Welsh Assembly Government on 12<sup>th</sup> June 2009, *"It is for local planning authorities to consider the appropriateness of the projections for their area, based upon all sources of local evidence, **including the need for affordable housing**"*

***identified by the Local Housing Market Assessment (LHMA).***” (Bold emphasis is from the WAG). Therefore, it is clear that the WAG believes the need for affordable housing should be a key factor in deciding whether or not to adopt the WAG household projections. Furthermore, judging from the WAG’s comments at the Examination session, it is also clear that the Assembly requires the authority to explore EVERY avenue to increase affordable housing provision, despite how small the increase in numbers would be.

3.3 To provide an example of the danger of reducing the housing requirement to the level proposed within the LDP, it is helpful to look at how housing need has increased in recent years. In this respect, an update to the Local Housing Market Assessment written in December 2008 states that the figure for affordable housing need has now increased to 706 units per annum. Therefore, despite the Authority building an average of 754 units over the two year period (approx) since the LHMA review, the requirement in terms of affordable housing need has increased by 238 units. This provides further proof that reducing the annual housing requirement even further would have an additional adverse impact on the delivery of affordable housing, which is something the Council clearly has not considered.

3.4 Bullet point 2 under paragraph D3 discusses the development of brownfield and greenfield sites. We disagree with the premise of this statement as the Council has not taken account of the ability of brownfield sites to deliver affordable housing, considering the significant cost that will be required for remediation works etc. We believe the paragraph represents a fundamental misunderstanding of national guidance and WAG priorities. Senior WAG officials and Ministers are constantly stating that the delivery of affordable housing is a **“Ministerial Priority”**, and therefore should be embedded within the LDP strategy. In addition to this, the need to deliver affordable housing should be balanced with the aims of sustainable development and therefore, surely a mixture of greenfield and brownfield sites that aim to reuse previously developed land and maximise affordable housing would be the most appropriate way forward. To assume that proposing a 97% brownfield strategy is the most appropriate strategy for the LDP, without considering the role greenfield sites can play in delivering affordable housing, including affordable housing for families, we believe represents a fundamental failing of any LDP strategy. As such, we do not believe the Council has considered the full range of options when it comes to maximising affordable housing.

3.5 In terms of the third bullet point under paragraph D3, there is absolutely no evidence put forward to support the claims that increasing the delivery of housing and 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.”*

3.6 In light of the above, we believe the housing requirement should be based on the 2006 WAG household projections, in order to ensure the delivery of affordable housing is not put at jeopardy. We also believe that greenfield sites should be identified, particularly within the SCC, in order to ensure the delivery of affordable housing is maximised.

#### **4. Section 3 – Deliverability**

4.1 We are not convinced that this section provides any further evidence to prove that the housing sites within the LDP are viable and deliverable, particularly brownfield sites within the SCC. We understand that certain sites have been discussed at individual sessions and evidence has been provide there, however, it is the responsibility of the authority to ensure their sites are deliverable for the stated land use. In light of this and considering the current strategy, particularly within the SCC, we still maintain that more work needs to be done to ensure the housing sites are capable of being delivered, taking into account the increased costs associated with developing brownfield sites and the plethora of planning obligations that will also be required.

#### **5. Final Conclusions**

5.1 After consideration of the evidence provided within the Document MA 2.1, we do not believe it provides any additional evidence to justify deviation from the WAG household projections. We were under the impression that this document would provide additional evidence that would give clarity to the reasoning behind the Council's decision to depart from WAG projections. However, it seems merely to repeat evidence from previous background documents, without providing any new evidence to prove the WAG projections would not represent a sound and robust dwelling requirement for the LDP. In addition to this, we do not believe this document provides any evidence to satisfy our concerns raised within the Deposit Plan consultation or our concerns raised within our position statement for the housing session. In this respect, our closing remarks mirror those provided within our position statement to the housing session. Those being:-

#### **5.2 Closing remarks**

- In light of the above, we do not believe the Council has provided sufficient evidence to justify deviating from the 2006 household projections within the Deposit LDP. We believe the housing requirement within the LDP should be based on 2006-projections as a minimum.
- In terms of land supply, we believe the current supply will need to be increased in order to account for the increase required in the dwelling requirement.
- We believe there are uncertainties within the current land supply, in terms of the viability and deliverability of sites, particularly brownfield sites, and their ability to provide a range and choice of housing. This requires more work from the Council to ensure those sites are deliverable.

Thank you for taking the time to consult the HBF at this stage of the process.

Yours sincerely,



**Richard Price**

**Planning and Policy Advisor – Wales**

**The Home Builders Federation**

**Haywood House North**

**Dumfries Place**

**Cardiff**

**CF10 3GA**