

**MATTERS FOR HEARING SESSION 2 – POPULATION, HOUSING AND HOUSING LAND SUPPLY  
– Matter Arising Examination Document reference – MA 2.6**

**ON BEHALF OF WELLSTRIDGE LIMITED**

**REPRESENTATION NUMBER 2630.D1, D2, D3 AND D4**

**SITE E70 LAND AT BEDWELLY ROAD, ABERBARGOED**

## **Housing Apportionment**

1. As provided by paragraph 9.2.2 of Planning Policy Wales (Edition 2) June 2010, the housing requirement for Caerphilly should be based upon the latest "Welsh Assembly Sub National Household Projections" as these "should form the starting point for assessing housing requirements".
2. The 2006 based Welsh Assembly sub national household projections expects the number of households within Caerphilly to increase from 72,500 in 2006 to 83,800 dwellings in 2021 i.e. 11,300 additional households. This is 2,650 dwellings greater than the figure allowed for in the Deposit LDP.
3. The overall housing requirement for Caerphilly in the Deposit Plan is based upon the SEWSPG process. However this was undertaken prior to the Welsh Assembly 2006 sub national household projections using household growth date with a 2003 base date.
4. Paragraphs A1 to A8 of the additional information provided by the Council details the background to the Apportionment Exercise but the paper does not justify the Council's deviation away from the WAG Household Projections. In terms of deriving Caerphilly's requirement it is highlighted that the authority undertook a capacity exercise to confirm the County's requirement rather than relying upon the WAG Household Projections and this approach was considered to be appropriate because the outcome was broadly in line with the Apportionment Exercise. Undertaking a capacity exercise to confirm the requirement is not considered to be robust or consistent with national guidance. Furthermore, in relation to the apportionment figures, it should be noted that the apportionment exercise is considered to be fundamentally flawed having no standing and is neither agreed nor based upon a scientific or robust analysis of household growth, being based on extrapolating past development rates. A robust justification for the deviation away from the WAG Household Projections is still considered to be missing from the Council's evidence base.

## **SB31 Background Paper 6 Population and Housing**

5. Caerphilly's stance of adopting the Moderate Growth Strategy is considered not to be robust. The High Growth Strategy is considered to be the robust strategy because Caerphilly is strategically located in close proximity to Cardiff and therefore it is reasonable to expect the County's net in-migration rate to increase to the average for the region.

## **Household to Dwelling Ratio**

6. No comments

### **ED13 BP6 Supplementary Paper 6 WAG 2006 based Population and Household Projection**

7. The Council criticise the WAG Household Projections highlighting that a number of factors including the high figure for natural change, how constant it is during the plan period and the small variation in annual estimates of the numbers of both births and deaths. THE WAG Household Projections are recognised as the starting point and paragraph 9.2.2 states that:

*'Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them in terms of the issues listed at paragraph 9.2.1 above.'*

8. Paragraph 9.2.1 states that:

*'In planning the provision for new housing, local planning authorities must work in collaboration with housing authorities, registered social landlords, house builders, developers, land owners and the community and must take account of the following:*

- People , Places, Futures - The Wales Spatial Plan;*
- Statutory Code of Practice on Racial Equality in Housing - Wales;*
- the Assembly Government's latest household projections;*
- local housing strategies;*
- community strategies;*
- local housing requirements (needs and demands)<sup>12</sup>;*
- the needs of the local and national economy;*
- social considerations (including unmet need);*
- the capacity of an area in terms of social, environmental and cultural factors (including consideration of the Welsh language) to accommodate more housing;*
- the environmental implications, including sustainable building standards (see Section 4.11), energy consumption, greenhouse gas emissions and flood risk;*
- the capacity of the existing or planned infrastructure; and*
- the need to tackle the causes and consequences of climate change.'*

9. Caerphilly CBC has failed to justify its deviation based on the above and rely's on the fact that a capacity exercise was undertaken, with the result being broadly in line with the outcome of the Apportionment Exercise. Allowing Caerphilly CBC to deviate away from the figures due to the lack of a robust evidence base will have implications for all LDPs in Wales and would not be consistent with national guidance.

## **Deliverability**

10. Having reviewed the paper Deliverability of Allocated Housing Sites – Planning Status (MA2.2) and Constraints (MA2.3), the initial concerns set out about the deliverability of sites is not addressed by the additional information provided by the Council.

## **Delivery and Implementation**

11. In paragraph 3.4 it is stated by the Council that '*It is highly likely that the delivery of housing completions will vary considerably over the 15-year period of the Plan*'. Having reviewed the allocated sites, further to the completions of housing varying over the 15 year period, it is considered that not all allocations are capable of being delivered in the 15 year period. The largest of which is Bedwas Colliery.

## **Candidate Sites Methodology**

12. By the fact that undeliverable sites have been allocated in the Plan, it is demonstrated that the site assessment methodology has not been robustly or consistently applied.
13. In terms of paragraph 3.11 in relation to Landowner/Developer Promotion of sites it does not guarantee that sites are deliverable within the plan period. For example, several of the sites are being promoted by Health Trusts whose future strategies and programmes are unclear due to public sector spending cuts, with strategies and programmes being reviewed and in some cases suspended. Furthermore, whilst Bedwas Colliery is being promoted by the landowner, a massive funding gap is evident with significant public sector money being required to pump prime the site. In the current environment, this is very unlikely to come forward.

## **Joint Housing Land Availability Study**

14. Paragraph 3.19 refers to 46 sites (62% of all units) already having planning consent which indicates developer interest. Historic planning consents do not constitute current developer interest with the economic climate having changed significantly over the last 3 – 4 years. Many of the consents are fairly historic and were not delivered in a good market.

## **Housing Site Categorisation Exercise**

15. Paragraph 3.23 states that:

*'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.'*

16. In terms of Bedwas Colliery, as highlighted above, due to public sector spending cuts it seems very unlikely that the public sector will provide money to clean up a site in private ownership.

#### **Policy SP7 Planning Obligations**

17. The additional wording is generally supported.

#### **Policy SP16 Total Housing Requirement**

18. The total housing requirement identified for the authority in Policy SP 16 should be 11,300 units not the 8,625 units identified. The reasons for this have been set out in earlier previous representation submitted on behalf of Wellstride Ltd.