

**CAERPHILLY LOCAL DEVELOPMENT PLAN EXAMINATION****HEARING SESSION 2: HOUSING PROVISION – SUPPLEMENTARY STATEMENT**

**Prepared by Boyer Planning on Behalf of R.E Phillips and Partners**

**In respect of Population, Housing & Housing Land Supply – Matters Arising MA2.1**

1. MA2.1 concerns matters arising from Hearing Session 2 relating to Population, Housing and Housing Land Supply. We are aware of the response provided in respect of this by the Home Builders Federation and endorse and adopt the analysis contained therein. Accordingly we do not, in the interests of brevity, repeat the arguments given in that response. Rather we highlight a number of points by way of direct response.
2. A - SEWSPG Apportionment: Paragraphs A.4 and A.8 confirm that the exercise undertaken by Caerphilly County Borough Council in respect of the original apportionment and the subsequent reduction in housing allocation was done on the basis of a view of housing capacity limited to sites with planning permission, allocations, windfalls, small sites and known previously developed land opportunities. Hence this is clearly a capacity driven exercise that did not consider the option of expansion of existing urban areas through greenfield development opportunities. As the Home Builders Federation state at paragraph 1.2 of its response, the approach has not had regard to population growth and need and demand for housing necessitating additional development sites.
3. In any event the SEWSPG apportionment has been superseded by evidence of need and demand for housing in the form of the latest household projections and the LPA Local Housing Market Assessment.
4. B – Moderate Growth Scenarios: The LPA paper has not considered the household change estimates against the projection variants provided by the 2006 based populations and were the subject of a Supplementary Statement submitted by ourselves on 13<sup>th</sup> April 2010. This demonstrated that the household change anticipated under the moderate growth strategy is below the low variant projection prepared by WAG.
5. C – Household Dwelling Ratios: In Background Paper ED.13 the LPA accept that to accommodate the level of household change identified by the latest household projections the level of housing would need to be higher. As the Home Builders Federation response indicates this ratio takes account of vacancy, second homes and demolition – factors identified in our own earlier representations. The dwelling ratio on page 10 of MA2.1 is not therefore the appropriate figure for the purpose of comparison.
6. D – Affordable Housing: Planning Policy Wales is clear that evidence of need and demand should inform the level of new housing to be provided in the LDP. Despite this the LPA consider it unrealistic for the planning system to deliver the level of housing identified in the Local Housing Market Assessment. However, this appears to miss the fundamental point that that at present the level housing in the Deposit Plan serves in fact as an impediment to achieving a higher level of housing need and demand by constraining the overall level of housing when there exists additional development

opportunities. The negative effects of this are described in our initial Hearing Statement, leading to an increased incidence of housing need. Similarly the suggestion that the additional allocations that would be required to help meet the high level of housing need would undermine the development of previously developed sites could be addressed by phasing provisions should this represented a genuine concern.

7. E - Deliverability: MA2.2 Deliverability of Allocated Housing Sites – Planning Status provides the LPA response to submissions made by Barton Willmore in respect of various sites. In a number of circumstances the LPA's response does not point to material progress in schemes being brought to implementation, rather that there remains time until the permission lapses for matters to be addressed or alternatively there remains sufficient time left within the plan period for new proposals to be brought forward absent any constraints. In two instances planning permission has now been refused.

8. In total we estimate that there are some 663 dwellings of the supply identified in the LPA schedule where there are obvious uncertainties in whether schemes will come to fruition.

9. This equates to approximately 10% of the supply identified in the schedule (totalling 6428 dwellings).

10. In our representations concerning the housing land supply estimates we have applied a non-implementation allowance of 10% (Appendix 1 of Hearing Statement dealing with Policy SP16 and the Deposit Plan's Housing Strategy 2049.D28, dated 26<sup>th</sup> March 2010). On the basis of the LPA assessment such an allowance, which is intended to take account of the likely unforeseen incidences where sites are not implemented either in their entirety or in part, permissions lapse or sites are developed for alternative uses, appears wholly reasonable and acceptable.

**Boyer Planning**  
**OJ/06.805**  
**16<sup>th</sup> June 2010**