

BLAENAU GWENT COUNTY BOROUGH COUNCIL JOINT HOUSING LAND AVAILABILITY STUDY 2012

BETWEEN BLAENAU GWENT COUNTY BOROUGH COUNCIL AND THE STUDY GROUP:

HOME BUILDERS FEDERATION LINC CYMRU HOUSING ASSOCIATION MELIN HOUSING ASSOCIATION UNITED WELSH HOUSING ASSOCIATION DWR CYMRU/WELSH WATER

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May 2013

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1.0 SUMMARY

- 1.1 This is the Blaenau Gwent County Borough Council Joint Housing Land Availability (JHLAS) Study for 2012. It replaces the report for the previous base date of 2011.
- 1.2 This report presents the housing land supply for the area at the base date of 1st April 2012.
- 1.3 The JHLAS has been prepared in accordance with the requirements of *Planning Policy Wales* (Edition 4, February 2011), *Technical Advice Note 1 (TAN 1): Joint Housing Land Availability Studies* and the Guidance Note on the JHLAS process (June 2011). Please refer to these documents for details of the requirements for the maintenance of a five year housing land supply in each Local Planning Authority area and the process for undertaking JHLASs. This document can be accessed on the Welsh Government web site using the following link:

<u>http://wales.gov.uk/topics/businessandeconomy/property/jhlas/?la</u> <u>ng=en</u>

1.4 Section 2 sets out details of the housing land supply and how it has been calculated. It shows that based on the 10 year past build rate method set out in TAN 1, Blaenau Gwent County Borough has **7.6** years housing land supply.

Involvement

- 1.5 The housing land supply has been assessed in consultation with:
 - Home Builders Federation
 - Linc Cymru Housing Association
 - United Welsh Housing Association
 - Melin Housing Association
 - Dwr Cymru / Welsh Water

Report production

- 1.6 Blaenau Gwent County Borough Council issued draft site schedules, site proformas and accompanying information for consultation between 25th October and 15th November 2012. A Statement of Common Ground (SoCG) was subsequently prepared by the Council and following consultation with the Study Group was submitted to the Welsh Government on 05th December 2012.
- 1.7 It was necessary for an appointed Planning Inspector to resolve a disputed matter in relation to the land supply calculation methodology.

- 1.8 The Blaenau Gwent UDP period expired in July 2011 during the study period and therefore, in line with recent updated guidance from the Welsh Government, Blaenau Gwent County Borough Council confirmed that it was their intention to calculate the 5 year housing land supply within their area by using the 10 year past build rate method set out in TAN 1. This was contested by the Home Builders Federation (HBF).
- 1.9 The appointed Planning Inspector subsequently prepared a report for the Welsh Government (see Appendix 4) making recommendations on the point of dispute. The Planning Inspector's recommendations were considered by Welsh Government and this information has been incorporated into this report.
- 1.10 Due to the above changes the five year land supply figure has been amended to 7.6 years.

2.0 HOUSING LAND SUPPLY

- 2.1 The five year land supply comprises sites with planning permission (outline or full) and sites allocated for housing in adopted development plans, categorised as prescribed in TAN 1.
- 2.2 The 5 year land supply has been calculated using the 10 year past build rate methodology as agreed by Welsh Government.

Table 1 – Identified Housing Land Supply

(A full list of sites can be found in Appendix 1)

	Housing Land Supply 01 st April 2012 – 2017 (Large Sites)											
		5 Year Land S (TAN 1 catego	Beyon Years	d 5								
	Proposed homes	Under construction	1	2	2*	3 (i)	3 (ii)	Homes completed since last study				
Total	2,147	48	142	543	0	1414	0	190				

2.3 Five year large site land supply break-down (i.e. Categories 1, 2, 2*, and Under Construction):

Table 2: Land Supply Breakdown

Private	462
HA Private	0
Public	0
HA Public	271
Total	733

2.4 Small Site Supply

The contribution from small sites of less than 10 dwellings is based on the completions for the last five years.

Small Site Completions												
2007 - 2008	2008 - 2009	2009 – 2010	2010 - 2011	2011 - 2012								
53	53	24	8	23	161							

Table 3 – Small Site and Conversion Completions for previous 5 years

- The small sites 5 year allowance is 161
- The small sites 5 year annual average is (161/ 5 = 32)
- 2.5 Overall total 5 year land supply (large + small sites) is <u>894 (733 + 161)</u>.

Table 4: Five Year Land Supply Calculation

(Using the 10 year Past Build Rate Method: Blaenau Gwent Unitary Development Plan 2002-2012)

2002-2012: 10 Year Past Building Rates Method												
Past 10 year Completions	Average	Total Land Supply in years										
Α	В	C	D									
	A/10		C/B									
1200/10.25	117	894	7.64 years									

3.0 COMMENTARY

3.1 TAN 1 states that where an adopted Plan is in place it is expected that the residual method will be used. Blaenau Gwent Unitary Development Plan expired in July 2011. Blaenau Gwent Council sought guidance from TAN 1 which allows for the average annual provision from the last 5 years to be extrapolated to give an estimate of the land required if an adopted Plan is not in place. Further guidance from Welsh Government, Version 2 – September 2012 states that "in recognition of the low delivery rates over recent years and the consequences of exceptional economic circumstances, it is considered that the 10 years preceding the study base date would currently be a more appropriate timeframe".

4.0 MONITORING DATA

4.1 TAN 1 requires the JHLAS report to provide additional information on the development of land for housing covering the use of previously developed land, the use of sites subject to flood risk constraints and the type of housing being developed, i.e. houses, flats or other. This data is set out below.

		Total Number and Percentage of Homes by Category and Land Type													
Year	5	Year	Supply		3i an	d 3 ii	Categor	ies		5					
	Greenfield Brownfield			field	Green	field	Brown	field	Greer	nfield	Brow	nfield			
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%			
2011	303	28	780	72	478	38	767	62	8	13	56	87			
2012	201	201 27 532 73 646 46 768 54 10 5 180 95													

Table 5 – Re-use of Previously Developed Land (Large Sites)

Table 6 - Sites subject to flood risk constraints (Large Sites)

	Total Number and Percentage of Homes by Category and Land Type													
Year	5 Year Supply 3i and 3 ii Categories Completions 2010-12													
	C1		(2	C1		(22	C	1	0	22		
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%		
2011	0	0	25	2	0	0	253	20	0	0	0	0		
2012	0	106	14	30	0	0	0	0						

Completions by House Type – 1 April 2011 to 31 March 2012 (Large Sites)

- 90 (47%) houses completed
- 100 (53%)apartments/flats completed

PRIVATE SECTOR SECTOR PREIFAT Residential Land Availability Schedule Amserlen tir preswyl sydd ar gael

Sites for 10 or more Units as at 01-04-2012 Safleodd ar gyfer 10 neu fwy o unedau a 01-04-2012

Sites with Planning Permission or in Adopted Plans Safleoedd a chaniatad cynllunio neu mewn cynlluniau a fabwysiadwyd

ABERTILLERY ABERTYLERI

LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	greiddio
Rhif Cyf ACLI	Cyfeiriad	Unedau a Adeiladwyd Ers yr Astudiaeth	Cyfanswm Unedau	Unedau sydd Ar Ol	Hectarau sydd Ar Ol	U/C								
		Ddiwethaf				WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
08/0207	At Cwm Farm Road	0	21	20	0.48	0	0	0	0	0	0	0	20	0
BGW UDP	Greenmeadow Farm, Cwmtillery	0	100	100	13.7	0	0	0	0	0	0	0	100	0
2009/0151	Penrhiw Estate, Brynithel	0	23	23	0.97	0	0	6	4	4	4	0	5	0
BGW UDP	Rear of Farm Road, Swfrydd	0	100	100	10.7	0	0	0	0	0	0		100	0
BGW UDP	Six Bells Colliery Site	0	50	50	2	0	0	0	0	0	0	0	50	0
BGW UDP	Warm Turn, Aberbeeg	0	15	15	6	0	0	0	0	0	0	0	15	0
Total	Abertillery													
Cyfanswm	Abertyleri	0	309	308	33.85	0	0	6	4	4	4	0	290	0

Residential Land Availability Schedule Amserlen tir preswyl sydd ar gael

Sites for 10 or more Units as at 01-04-2012 Safleodd ar gyfer 10 neu fwy o unedau a 01-04-2012

> Sites with Planning Permission or in Adopted Plans Safleoedd a chaniatad cynllunio neu mewn cynlluniau a fabwysiadwyd

BLAINA NANTYGLO & BLAINA

LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	egreiddio
						U/C								
Rhif Cyf ACLI	Cyfeiriad	Unedau a	Cyfanswm	Unedau	Hectarau									
		Adeiladwyd	Unedau	sydd Ar	sydd Ar									
		Ers yr		OI	OI									
		Astudiaeth												
		Ddiwethaf				WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
2006/0151	At Cwm Farm Cwm Celyn, Blaina	2	169	72	3.94	11	10	10	10	10	10	0	11	0
BGW UDP	North of Forgeside, Blaina	0	40	40	4	0	0	0	0	0	0	0	40	0
BGW UDP	North Winches Row, Nantyglo	0	57	57	3.75	0	0	11	0	0	0	0	46	0
Total	Blaina													
Cyfanswm	Nantyglo & Blaina	2	266	169	11.69	11	10	21	10	10	10	0	97	0

BRYNMAWR

LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	egreiddio
						U/C								
Rhif Cyf ACLI	Cyfeiriad	Unedau a	Cyfanswm	Unedau	Hectarau									
		Adeiladwyd	Unedau	sydd Ar	sydd Ar									
		Ers yr		OI	OI									
		Astudiaeth												
		Ddiwethaf				WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
9279	Adj to Clydach Street	2	15	8	0.51	0	2	2	2	2	0	0	0	0
2009/0105	Glaslyn House, Former Nursing Home, Alma Street	0	10	10	0	0	0	0	0	0	0	0	10	0
2008/0430	TSA Woodcraft Site, Noble Sq Brynmawr	0	37	25	0.7	0	6	19	0	0	0	0	0	0
Total	Brynmawr													
Cyfanswm		2	62	43	1.21	0	8	21	2	2	0	0	10	0

Residential Land Availability Schedule Amserlen tir preswyl sydd ar gael

Sites for 10 or more Units as at 01-04-2012 Safleodd ar gyfer 10 neu fwy o unedau a 01-04-2012

Sites with Planning Permission or in Adopted Plans Safleoedd a chaniatad cynllunio neu mewn cynlluniau a fabwysiadwyd

EBBW VALE GLYNEBWY

LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	egreiddio
Rhif Cyf ACLI	Cyfeiriad	Unedau a Adeiladwyd Ers yr Astudiaeth Ddiwethaf	Cyfanswm Unedau	Unedau sydd Ar Ol	Hectarau sydd Ar Ol	U/C WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
2007/0531	45 Yard	26	109	0	0	0	0	0	0	0	0	0	0	0
2008/0006	Beaufort Garage, Beaufort	0	14	14	0.07	0	0	0	0	0	0	0	14	0
2010/0167	Corus Site	0	500	496	78	0	0	0	0	47	30	0	419	0
2007/0658	Higgs Yard (off Newchurch Road)	0	29	29	0.53	0	0	0	0	0	29	0	0	0
BGW UDP	Highland Road, Beaufort	0	50	50	0	0	0	0	0	0	0	0	50	0
2008/0327	Land North Cwmrhydd Erch Flats	0	16	15	1.37	0	2	3	3	3	4	0	0	0
2010/0175	Letchworth Road	3	22	17	0.38	0	3	3	3	3	5	0	0	0
BGW UDP	Nant-y-Croft HE1 & HE5 Rassau	0	30	30	1.7	0	0	0	0	0	0	0	30	0
2009/0394	Pant Y Fforrest, Ebbw Vale	0	21	21	1.7	0	0	0	0	0	0	0	21	0
Total	Ebbw Vale													
Cyfanswm	Glynebwy	29	791	672	83.75	0	5	6	6	53	68	0	534	0

Residential Land Availability Schedule Amserlen tir preswyl sydd ar gael

Sites for 10 or more Units as at 01-04-2012 Safleodd ar gyfer 10 neu fwy o unedau a 01-04-2012

Sites with Planning Permission or in Adopted Plans Safleoedd a chaniatad cynllunio neu mewn cynlluniau a fabwysiadwyd

TREDEGAR

LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	egreiddio
Rhif Cyf ACLI	Cyfeiriad	Unedau a Adeiladwyd Ers yr Astudiaeth	Cyfanswm Unedau	Unedau sydd Ar Ol		U/C WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
BGW UDP	Adj Chartist Way, Tredegar	Ddiwethaf 0	80	80	3.7	0	0	0	0	0	0	0	80	3(II) 0
2009/0283	Gas Works, Tredegar	0	25	25	0.5	0	0	0	0	0	25	0	0	0
2008/0459	Glandovey Terrace	0	10	5	0.21	0	5	0	0	0	0	0	0	0
BGW UDP	Hill's Bus Depot, Park View Garage	0	20	20	0.7	0	0	0	0	0	0	0	20	0
2007/0418	Land off Merthyr Road, (Corporation Yard) Ashvale	0	23	23	0.73	0	0	0	0	10	13	0	0	0
2010/0331	LCR Charles Street, Tredegar	0	14	12	0.23	1	1	1	1	1	1	0	7	0
2009/0329	Park Hill **	0	293	293	13	0	0	0	0	0	0	0	293	0
2007/0400	Peacehaven Tredegar	8	147	139	3.7	3	26	20	20	20	20	0	30	0
2009/0186	Poultry Farm	1	22	3	0.8	0	1	1	1	0	0	0	0	0
2007/0613	The Goldmine Inn, Formally the Sirhowy	0	16	16	0.17	0	0	0	0	16	0	0	0	0
7964	Upper Ty Gwyn Farm Nantybwch	0	48	35	0.73	0	3	3	3	3	2	0	21	0
Total	Tredegar													
Cyfanswm		9	698	651	24.47	4	36	25	25	50	61	0	451	0
Total Cyfanswm		42	2126	1843	154.97	15	59	79	47	119	143	0	1382	0

HOUSING ASSOCIATION, PUBLIC CYMDEITHAS TAI, CYHOEDDUS

Residential Land Availability Schedule Amserlen tir preswyl sydd ar gael

Sites for 10 or more Units as at 01-04-2012 Safleodd ar gyfer 10 neu fwy o unedau a 01-04-2012

Sites with Planning Permission or in Adopted Plans Safleoedd a chaniatad cynllunio neu mewn cynlluniau a fabwysiadwyd

ABERTILLERY ABERTYLERI

LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	egreiddio
Rhif Cyf ACLI	Cyfeiriad	Unedau a	Cyfanswm		Hectarau	U/C								
		Adeiladwyd Ers yr	Unedau	sydd Ar Ol	sydd Ar Ol									
		Astudiaeth Ddiwethaf				WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
2008/0383	Land Adjoining Council Flats (Hill Crest View)	0	22	22	0.22	0	0	0	22	0	0	0	0	0
2008/0064	Site of Roseheyworth Junior Comprehensive, Oak Street	0	32	32	1	0	0	0	0	0	0	0	32	0
2009/0265	Swfrydd Junior School	20	20	0	0	0	0	0	0	0	0	0	0	0
Total	Abertillery													
Cyfanswm	Abertyleri	20	74	54	1.22	0	0	0	22	0	0	0	32	0

Residential Land Availability Schedule Amserlen tir preswyl sydd ar gael

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LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	egreiddio
						U/C								
Rhif Cyf ACLI	Cyfeiriad	Unedau a	Cyfanswm		Hectarau									
		Adeiladwyd	Unedau	sydd Ar	-									
		Ers yr		OI	OI									
		Astudiaeth												
		Ddiwethaf				WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
2009/0173	Site at former Hafod Dawel Residential Home Hosp Road	44	44	0	0	0	0	0	0	0	0	0	0	0
Total	Blaina													
Cyfanswm	Nantyglo & Blaina	44	44	0	0	0	0	0	0	0	0	0	0	0

BRYNMAWR

LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	egreiddio
Rhif Cyf ACLI	Cyfeiriad	Unedau a Adeiladwyd Ers yr Astudiaeth	Cyfanswm Unedau	Unedau sydd Ar Ol	Hectarau sydd Ar Ol	U/C								
		Ddiwethaf				WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
2010/0226	Recticel and Gwalia Site Factory Road	0	40	40	0.91	0	24	16	0	0	0	0	0	0
Total	Brynmawr													
Cyfanswm		0	40	40	0.91	0	24	16	0	0	0	0	0	0

Residential Land Availability Schedule Amserlen tir preswyl sydd ar gael

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Sites with Planning Permission or in Adopted Plans Safleoedd a chaniatad cynllunio neu mewn cynlluniau a fabwysiadwyd

EBBW VALE GLYNEBWY

LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	egreiddio
Rhif Cyf ACLI	Cyfeiriad	Unedau a Adeiladwyd Ers yr Astudiaeth Ddiwethaf	Cyfanswm Unedau	Unedau sydd Ar Ol	Hectarau sydd Ar Ol	U/C WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
2007/0320	Adj Sports Ground Gwaun Helyg	0	73	73	1.4	0	0	0	0	13	60	0	0	0
2008/0353	Commercial Street, Briery Hill	0	32	32	0.91	0	26	6	0	0	0	0	0	0
2007/0237	Mountain Road (Land off)	9	52	33	0	33	33	0	0	0	0	0	0	0
2008/0429	Victoria Avenue	0	15	15	0.2	0	0	15	0	0	0	0	0	0
Total	Ebbw Vale													
Cyfanswm	Glynebwy	9	172	153	2.51	33	59	21	0	13	60	0	0	0

TREDEGAR

LPA Ref No	Address	Units Built Since Last Study	Total units Capacity	Units Rmng	Hectares Rmng		Categor	isation					Cate	egreiddio
Rhif Cyf ACLI	Cyfeiriad	Unedau a Adeiladwyd Ers yr Astudiaeth Ddiwethaf	Cyfanswm Unedau	Unedau sydd Ar Ol	Hectarau sydd Ar Ol	U/C WA	2013	2014	2015	2016	2017	2*	3(i)	3(ii)
2010/0001	Derelict Bus Garage, Adj Woodfield Road	16	16	0	0	0	0	0	0	0	0	0	0	0
2009/0007	Former Sirhowy Infants School	0	23	23	0.83	0	0	0	23	0	0	0	0	0
2007/0527	LCR Factory Opposite Tredegar Comprehensive	47	47	47	0	0	0	0	0	0	0	0	0	0
2005/0155	The George, Mount St, Tredegar	12	12	0	0	0	0	0	0	0	0	0	0	0
Total	Tredegar							0						
Cyfanswm		75	98	70	0.83	0	0	0	23	0	0	0	0	0
Total Cyfanswm		148	428	317	5.47	33	83	37	45	13	60	0	32	0

Appendix 2 – Past Completion Data

	Number of Homes Completed On									
Year	Large Sites	Small Sites	Total Completions							
2002	98	3	101							
2003	98*	4	102							
2004	98*	12	110							
2005	98*	28	126							
**Jan –		11								
Mar 2006	25*		36							
2007	32	41	73							
2008	49	53	102							
2009	97	53	150							
2010	91	24	115							
2011	64	8	72							
2012	190	23	213							
TOTAL			1200							

Large Site 10 year Completions

*Completions from 1996 – 2005 were for the yearly period 01st January – 31st December **Completions shown for 2006 are for the 3 month period 01st January – 31st March 2006. Completions from 2007 are for an annual period 01st April 06 -31st March.

Appendix 3 – Previous Land Supply Data

	5 year si of Home		Number of			
Year	1	2	2*	years supply	3i	3ii
2008	119	957	0	7.8	1361	0
2009	116	761	0	7.1	1167	0
2010	164	936	0	8.9	1205	0
2011	258	825	0	7.9	1245	0
2012	142	543	0	7.6	1414	0



Adroddiad ar gydastudiaethau argaeledd tir ar gyfer tai

Report on Joint Housing Land Availability Study

gan P J Davies BSc (Hons) MA MRTPI Arolygydd a benodir gan Weinidogion Cymru

Dyddiad: 22/04/2013

by P J Davies BSC (Hons) MA MRTPI an Inspector appointed by the Welsh Ministers Date: 22/04/2013

Ref: APP/X6910/JHLAS/12/515695 Local Planning Authority: Blaenau Gwent County Borough Council

- This report concerns the Blaenau Gwent County Borough Council Joint Housing Land Availability Study (JHLAS) April 2012.
- The matters in dispute are set out in the JHLAS Statement of Common Ground (SoCG) submitted to the Welsh Government December 2012, and additional information submitted February 2013.

Recommendation

1. That the 2012 JHLAS housing land supply figure for the Blaenau Gwent County Borough Council area be determined as 7.6 years.

Context of the Recommendation

- Local Planning Authorities have a duty to ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing¹. The purpose of preparing a JHLAS is to:
 - Monitor the provision of market and affordable housing;
 - Provide an agreed statement of residential land availability for development planning and control purposes; and
 - Set out the need for action in situations where an insufficient supply is identified².
- 3. The scope of this report is to recommend an appropriate housing land supply figure in respect of the Blaenau Gwent County Borough Council area, in the light of the matters in dispute concerning the calculation of such a figure.

Procedural Matter

4. Following a query from the Planning Inspectorate, the Local Planning Authority (LPA) submitted additional information and a new calculation for the land supply figure. Due

¹ PPW Edition 5 paragraph 9.2.3

² TAN 1: Joint Housing Land Availability Studies (June 2006) paragraph 2.1

to a change in the way that completion data was recorded around 2006, the timeframe for the calculation of the updated past build rate figure is actually 10.25 years. The further information confirmed that, in line with TAN 1 Para 7.1.5, the small site allowance in the SoCG is based on the contribution from such sites over the past five years.

Main Issue

5. There is agreement with regard to the details of all of the sites included within the JHLAS schedule, resulting in agreement as to the number of housing units to be included within the 5-year land supply. The main issue is the appropriate evidence to be used to reach the number of years of land supply that the agreed number of units represents.

Reasons

- 6. At the time of the base date of the study, and notwithstanding the progress of the Local Development Plan (LDP), there was no adopted development plan in place. In these circumstances, and in line with the advice in TAN 1, a comparison of available land with past building rates should be used.
- 7. The LPA have provided a land supply figure calculation utilising the past build rate methodology, based on an approximate 10 year timeframe. HBF acknowledge that this is in line with the Welsh Government (WG) Guidance Note on the JHLAS process (Version 2 September 2012). However the HBF state that the past build rate does not adequately reflect the level of development needed over the next 5 years and consider that the evidence used in the preparation of the LDP should be used. Nonetheless, at the time of the study base date the LDP had yet to be found sound. In addition, new LDP housing allocations are not included in the current schedules. I do not therefore consider it appropriate to use the LDP evidence at this time. Paragraph 7.5.4 of TAN 1 makes reference to utilising up to date data from a deposited LDP if all members of the Study Group agree. However, that provision is made for instances where an older adopted plan covers the whole of the JHLAS period, and therefore does not apply in this case.
- 8. In the absence of an adopted plan, and in line with TAN 1 and WG guidance, I conclude that the past build rate methodology is the appropriate method to be used in this case.

Conclusion

9. Having regard to the agreed housing supply of 894 units and the average build rate of 117 units over the past 10.25 years, I conclude that the 2012 JHLAS housing land supply figure for the Blaenau Gwent County Borough Council area be determined as 7.6 years.

P J Davies

Inspector