

# **WELSH GOVERNMENT**

## **Position Statement**

**Examination Hearings: June/July 2012**

**Hearing Session 2: Housing**

**Blaenau Gwent Local Development Plan**

## **SESSION 2 HOUSING (policy, numbers and phasing)**

*We note that the Council will provide a short paper on vacant housing to support this hearing session. This will be circulated to all parties in advance of this session.*

### **Question 1.**

**1a. What evidence underpins the case for the Plan's proposed housing target and phasing in the light of recent construction rates, population movements, national guidance and policy?**

**1b. Does the Council's current target represent a realistic and soundly based target or is it an aspirational figure?**

National Policy: see Planning Policy Wales – in particular para.9.2.2. Our Deposit Rep.Cii. Housing – New Dwelling Requirement (LPA Ref: 3D.146) sought clarity with regard to the relationship of the dwelling requirement with the WG 2008-based projections. Focussed Change FC1.F, together with the Updated Population and Housing Background paper (doc SD41) provides the necessary clarity.

Housing target: The Deposit Plan policy SP4, as amended by FC1.E, has a housing target of 3,500 dwellings (Deposit Plan has 3,666) which is to be delivered by providing for 12% flexibility totalling 3,932 dwellings.

Past build rates and phasing: Our Deposit Rep.Bi.i. Deliverability: Housing raised the issues of past build rates and phasing (LPA Ref: 3D.127 & 405). We noted that, whilst we support the growth aspirations of the LDP strategy, deliverability of housing should be considered at the examination; we noted that there appears to be a good mix of sites and a reasonable degree of confidence in delivery with the major funding sources outlined in Ch.9 and with the progress with masterplanning of the key strategic sites.

- Past build rates (Deposit Plan para 6.37):

Our Deposit response (Rep:3D.127) noted that policy SP5 translates to build rates of 164pa in 2006-11 rising to 264pa in 20011-16 and 305pa in 20016-21; and we compared this to past build rates (Table 9 of doc SD41 Updated Population & Housing background Paper).

Our Focussed Change response noted that the Report of Representations (doc SD07b – page 37ff) provided reasoning, whilst no change was proposed to the Deposit Plan. The Council (doc SD07b –page 42 Council's analysis) grounds its clear aspiration for growth in the major regeneration sites at The Works and Ebbw Vale North regeneration sites based upon high past build rates at the Garden Festival site and current take-up at the Ebbw Vale North site.

We consider that the Plan's Written Statement should include clarification of why the Council considers that the step change required in build rates is achievable over the plan period.

If the proposed build rates are considered to be reasonable (albeit aspirational), then it is vital that the monitoring framework includes key

triggers so that any significant shortfalls in progress can be identified through the annual monitoring reports.

- Phasing

In our response to the proposed Focussed Changes we pointed out that whilst FC1.J (re. Plan para 6.37) goes some way to meeting our Deposit Rep B.i.i.b. Deliverability: Housing-Phasing (LPA Ref: 3D.405), we consider that a further (minor factual) change is required to include the information contained in Table 3 of the new Housing Delivery Paper Feb2012 (submission doc: SD44) in order that the plan itself clarifies the overall spatial distribution of phased housing development (sites).

In addition, the statement in the proposed revision to para 6.37 about the phasing being “only indicative” fails to clarify what needs to happen to deliver the strategy.

**Question 2.**

**How do the figures in the proposed site allocations match the various figures in Policies SP4 and SP5?**

No comment

**Question 3.**

**To what extent will the amount of new housing anticipated rely on windfall development?**

No comment

**Question 4.**

**Does the Council’s target seek to promote too much housing without the increased employment base needed to support the level of population growth anticipated?**

No comment

**Question 5.**

**What are the implications of increasing the overall supply of housing in the county borough on other Council initiatives such as its empty homes strategy?**

No comment

**Question 6.**

**Should the Council’s target for new housing be higher? If not, why not? Should the target be lower? If not, why not?**

The target should be based on robust evidence and have regard to national policy; the target should only be changed if found to be unsound.

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