

CONSULTATION RESPONSE



Blaenau Gwent LDP – Housing Session Examination Statement

30/5/2012

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

Notwithstanding our objection to the proposed housing requirement, which is chiefly concerned with the detail of the figure chosen, we believe it is highly appropriate for the Council to adopt an aspirational strategy, if it is to succeed in stemming out migration. In fact, the very fact that out migration is continuing to occur over recent years is evidence in itself, not to rely too heavily on recent trends when considering the appropriate level of future development.

In terms of delivery, we believe a balance needs to be struck when considering any potential negative effects of the strategy chosen. For instance, would the negative implications of planning for continued outmigration and decline, outweigh any negative implications of adopting an aspirational strategy that aims to support and encourage regeneration and investment, but does not necessarily accord with recent trends? In the respect, we believe the answer is clear. It would be far better to plan to reverse recent trends with a strategy that aims to foster growth and attract investment, than to accept defeat and plan for decline. One thing is certain, if you do not plan for growth it will definitely not happen and therefore, we believe the authority is fully justified in adopting an strategy that aims to reverse recent trends.

However, to caveat the above, in order to ensure such a strategy is successful, the policies that aim to deliver it must recognise the wider picture and ensure the ability to attract future development and investment is not stifled. In this respect, the LDP's policies must be viable, deliverable and geared towards attracting investment to the area. To a certain extent, we believe the LDP must recognise the limitations to delivering development in the authority in the short term and plan to eradicate these

limitations over the long term. We must also consider the possibility that a complete change in fortunes might not happen over the lifetime of the current plan, but we must also recognise that this LDP should be seen as the starting point for the journey. Adopting realistic policies is fundamental to the success of an aspirational strategy. As such, we believe any policies that impact on the delivery of development (such as policies to require planning obligations or affordable housing), must be realistically based on evidence to demonstrate delivery, and must also be sufficiently flexible to ensure development can proceed in the various areas of the authority.

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?

We do not see any evidence to support the assumption that the level of housing supply would somehow compromise the delivery of a strategy to tackle empty homes. In fact, one could argue that increasing the delivery of homes might provide more scope for financial contributions to be secured to upgrade existing empty homes for the use as affordable housing. Clearly viability will play a key role in determining whether or not this is possible, but we certainly do not see any conflict between setting robust targets for housing delivery and having an aspirational strategy for the reduction of empty homes.

The extent to which the strategy to reduce the empty homes target is credible and robust is another question. We have commented, through the deposit plan, that the assumptions with regard to reduction of empty homes are not based on any credible evidence to demonstrate they can be achieved. We believe this is an issue that needs to be addressed before any weight is given to these assumptions.

6. Should the Council's target for new housing be higher? If not, why not? Should the target be lower? If not, why not?

Notwithstanding our comments on the housing requirement, which states the level of housing set out by Policy SP4 should be higher, we believe there is a plausible argument to suggest that the level of development we propose should be the absolute minimum set by the LDP.

Clearly the council assumes that the current housing requirement set out within Policy SP4, is the required level in order to deliver the aims and objectives for the

strategy. However, we believe there are also number of external factors, which have not been considered in the adoption of the housing requirement, that we believe could indicate the need for a higher level of housing to be provided.

Firstly, the need for affordable housing is clearly a factor that should be considered when deciding on the appropriate level of housing to adopt over the plan period. National guidance is clear in this regard and PPW states specifically that this should be a key factor in any decision to deviate from the WG projections. As such, given the level of affordable housing need currently experienced in the authority, and the clear evidence that the LDP will not come close to resolving the problem, we believe this is unequivocal evidence to demonstrate that the housing requirement should not be any lower than that which is proposed by our suggested amendment to Policy SP4. Indeed, given the extent of affordable housing need, one might argue that the council should pursue a higher housing delivery target.

Secondly, we believe the continued evidence on outmigration should also be a key factor in the decision to ensure house building levels are not lowered. Migration levels are a key driver for population growth and decline, and are a component of change that can be influenced directly by the LDP, particularly through the delivery of housing and allocation of land for development. Therefore, given the clear strategy aim of the LDP to stem out migration, we believe the level of development should not be lowered based on recent trends, but should be held at least to the level proposed by our suggested amendment to Policy SP4. Again, if the strategy is to reverse trends then clearly any increase in the housing delivery target will aid in this regard. However, there is clearly a balance to be struck on the appropriate level of development to adopt, given the infinite nature of employing such a strategy.

In light of the above, we would argue that there is compelling evidence to warrant increasing the housing delivery figure, or at least to ensuring the current proposed figure (as suggested by our amendment to Policy SP4), should be the minimum level of development proposed for the LDP.

End.

Richard Price

Planning and Policy Advisor – Wales

The Home Builders Federation

Po Box 2512

Cardiff

CF23 0GB

E-mail - richard.price@hbf.co.uk

Telephone – 02920 751076