

**Hearing Session 2****HOUSING PROVISION****Matters & Issues Agenda****3 Is the housing requirement figure of 7,184 appropriate to meet the needs of the Counties over the Plan period?**

- a. Has the Plan been informed by a robust assessment of the housing requirement, having regard to Planning Policy Wales?
- b. In identifying the requirement figure, has adequate regard been paid to the Welsh Government household and population projections?

*It is clear that the latest 2011 projection figures have been taken account of in the updated topic papers, however it is less clear if the letter from the Housing Minister Carl Sargeant dated April 2014 has been taken account of. This reminded them 'that LPA's should take care in using these figures due to them being based on a period of recession. Accordingly they should not be the sole basis for reaching a housing figure and **all** relevant sources of evidence should be considered.'*

- c. Has the requirement figure been informed by a robust assessment of the main local influences on housing demand, including: household formation, migration, and household conversion ratios.

**4 Are the Housing Supply calculations set out in Policies TAI14-17 (as amended by NF77 & 78) appropriate?**

*The HBF have previously suggested that in view of the economic growth potential of the area that the housing figure could be higher as a result of the Councils being more aspirational. It would be missed opportunity if in planning housing provision for the future that economic growth potential was restricted.*

- a. Are the figures in TAI14-17 sufficiently up to date and accurate?

*The HBF would suggest that the figures could be updated to an April 2016 base date.*

- b. Will the Plan provide a 5 year supply of housing for the duration of the Plan?

*The HBF note the five year land supply tables in Annex II of TP20A however the figures shown for 2011- 2015 do not reflect the actual land supply that was agreed by the JHLAS, this is confusing and could be misleading.*

- c. Are all the site allocations available and deliverable within anticipated timescale? Are the allocations supported by a robust and comprehensive site assessment methodology, free of significant development constraints and demonstrated to be economically viable and deliverable?

*The HBF would note that in the TP1 the original viability assessment the word 'viability' did not appear in the document. We have also already raised concerns about the reliance on sites previously allocated which if assessed for viability were access a long time ago.*

d. Is the estimated yield of units from committed sites and windfall sites realistic, based on the available evidence?

*The HBF would note that we have raised concerns that a number of the committed sites have been 'rolled over' from previous plans and in some cases benefit from extant permissions by virtue of implementation but with no further delivery of units. We also consider the level of windfalls high considering that the Council themselves acknowledge that levels of windfalls will reduce on adoption of the plan and also the drawing of tight settlement boundaries around a large number of settlements may limit windfall opportunities in the future.*

e. Is the Plan's approach to phasing of delivery appropriate? How would the anticipated rate of delivery be facilitated in practice?

*The HBF note that Policy TA1: 4 refers to phasing 'Ensuring the correct mix of housing unit types and tenures to meet the needs of the Plan area's current and future communities, and where appropriate be subject to a phasing requirement'. The HBF support the Inspectors concerns identified in TP20 A that 'I presently have reservations in terms of allowing total discretion to the decision maker on an individual planning application whether or not to phase the development.' As identified elsewhere in our comments such uncertainty would make it very difficult for developers to understand the viability of a site in the early stages of site buying. It is also noted that there is no explanation of how such a phasing approach may work in practise in either the policy or the explanatory text to the policy.*

*Further the HBF object to 'New Policy TAI X', as the three suggested solutions do not support the initial text of the policy as they do not relay assist with 'phasing' of the development. The impact of proposed development must surely have been a consideration of the Council when allocating the sites, so is there any need for this general policy. The HBF note that although this type of policy has been seen before, it has been in relation to a specific issue such as the impact on Welsh Language, which is covered by Policy PS1 in the plan.*

*In terms of the three points below the main policy wording we would comment as follows:*

1. *Short planning permissions – we see no reason why this is required for either allocated sites or windfall sites as the plan accepts that both of these will take place so why restrict their delivery. Further if this requirement was accepted it should not simply be at the discretion of the Council but subject to set of agreed criteria.*

2. *The HBF are aware of a recent appeal decision where the Inspector did not support such an approach [Appeal Ref: APP/A6835/A/15/3137719 Site address: Land at Issa Farm, Mynydd Isa, Flintshire]. Further Circular 16/2014 The Use of Planning Conditions for Development Management at para 3.9 states:*

*A condition requiring that the whole of the development permitted be completed is likely to be difficult to enforce. If a large development such as an estate of houses is left half-complete, this may well be because of market changes (for example, a shift of demand from four-bedroom to two-bedroom houses), and it would clearly not be desirable to compel the erection of houses of a type for which there was no demand or need. Conditions requiring the completion of the whole of a development should therefore not normally be imposed.*

3. The HBF have no objection to this point however we do not see how it assists with phasing of development, it merely forces developers to start the development or lose the planning permission.

*In terms of the explanatory text phasing as a result of infrastructure requirements happens naturally and does not require the Council to control it. Developers would not start a development until they knew that the required infrastructure was in place or they had control over the timing of its provision.*

*Further it suggest that phasing decision will be based on current commitments, however this will be difficult as the Council has limited control over these other than knowing as to whether or not they have started. Older consents will not have been subject to the same control suggested by the policy and a number will have extant permission.*

*Many of the issues identified in para.7.4.12b would be avoided if these issues were considered at the time of either allocation of the land or granting of the planning application. The policy does not really help resolve the existing issues and although it may help stop the issue becoming worse the HBF suggest that these issues should be resolved at the allocation stage not through a restrictive Policy.*

*HBF would request that this proposed new policy is omitted from the plan.*

f. Are the proposed completions rates realistic? What are the implications of failing to deliver the required amount of housing?

*The HBF note that the completions rates identified in Annex 11 of TP20 do exceed those previously achieved, however they are not considered to be an excessively large jump or to be considered unrealistic. However achieving them will clearly be helped by ensuring the right sites are allocated in the plan and the current reliance on existing sites with extant permission and windfalls is a concern to the HBF. Further unnecessary 'phasing' of development on an arbitrary basis by the Council will not help with these delivery rates.*

g. Does the 10% slippage allowance provide sufficient flexibility in the event of sites not coming forward as anticipated?

*The HBF accept that 10% is the usual figured used to provide flexibility.*

**5 In relation to other specific types of housing provision:**

a. Is there justification for limiting new housing in the lower tier settlements to meeting only 'community need' or affordable housing? Would the policy serve its intended purpose? How would it work in practice?

c. Will policy TAI3 serve its intended purpose with regard to managing the effect of temporary construction workers on the future stock of housing?

*The HBF do consider this policy confusing at the moment as in its heading it refers to 'temporary construction workers' although it is in reality is a policy relating to the provision of permanent housing as a result of larger construction projects. It is not clear to the HBF how this will impact on the five year land supply or the total housing provision figure.*

**6 Does the Plan provide a sound basis for implementation and monitoring of housing provision?**

a. Does the Plan incorporate robust monitoring and review mechanisms that will enable the housing strategy to respond effectively to changing circumstances?

**7 Any other matters**