

<b>Welsh Government Comments: Matters Arising Session 2 &amp; 3 – Housing Provision &amp; Delivery</b>
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### **Session 3: Housing Provision**

**Review and update table in policy H1 of sites contributing to the identified overall housing supply of 11,622 units over the Plan period (ie identified requirement +12% flexibility allowance) in light of current evidence and points discussed during the hearing.**

**Correct/clarify policy H1 tables column headings as discussed and simplify “dwellings under construction” table.**

The Welsh Government supports the update to Policy H1 and notes that both the overall level of housing provision and the flexibility allowance of 12% have been re-instated to the previous level as set out in the Revised Deposit Plan. The simplification of the various components of housing supply is welcome.

**Assess and evidence implications of additional sites identified as commitments for extent of reliance on windfall sites (above 10 units) as a component of overall delivery, demonstrating no resulting “double counting” of units as new commitments and as part of the identified windfall component.**

The Council has produced additional analysis in respect of past windfall trends, including the types and size of windfall sites for the period 2006-2011. The rationale for using this time period is to avoid double counting in respect of the UDP. The Welsh Government considers that this additional in depth work appears to be a sensible approach.

**Check and produce evidence confirming flood zone DAM status of all sites relied on to deliver the Plan’s housing requirement and demonstrating full compliance with TAN 15 concerning permitting highly vulnerable development and development justification requirements for zones C2 and C1.**

The Council has provided additional detail in respect of the sites that are subject to flood risk within in Appendix 3 of their submission.

In addition, the DAM (Zone C1 & C2) status of sites was discussed in some detail at the Environment & Heritage Session. As part of that session the Council agreed to delete Church Street (16 units) as the site has no planning permission and is wholly within flood zone C2. It was agreed at the session that keeping the site in the plan would be contrary to national policy. The Welsh Government considers that this small reduction is minimal in terms of its impacts on the overall housing provision.

Following the detailed discussions at the Environment Hearing Session the Inspector asked the Council to provide further evidence for the remaining C1 sites in respect of progress to date, and the viability implications of any flood risk mitigation measures that would be required in order to make these sites TAN 15 compliant.

It would be helpful if the Council could provide this information prior to the additional housing session in order for all stakeholders to consider what impact, if any, this may have on the overall level of housing provision.

**Review deliverability evidence in relation to H1 (35) East Usk Yard and whether site should be relied on to contribute to housing provision within the Plan period.**

No comment.

**Add policy component to policy H3 providing local evidence-based minimum density target(s) for new housing developments.**

The Welsh Government considers that that approach proposed is sensible and links more clearly to the Councils monitoring framework.

### **Session 3: Housing Delivery**

**Amend and update delivery and implementation table in Chapter 13 of Plan so as to provide consistent “read across” with tables to policy H1, clarifying in Plan text that table is for broad summary indicative purposes.**

We note that the Council has provided an update to its Housing & Delivery Chapter (Annex 5) that now links more appropriately with Policy H1. This additional clarity is welcome.

**Provide evidence to demonstrate that the identified housing land supply is sufficient to deliver housing through the Plan period at a rate consistent with the employment growth-based household forecasts on which the Plan is founded.**

No comment.

**Provide further information on sites where there have been delays in completing s106 obligation discussions, to show why these sites can be relied upon as delivering part of the Plan’s housing requirement**

No comment.

**Provide revised housing land supply trajectories, in light of revised policy H1 tables and evidence on sites coming forward, to demonstrate a 5 year land supply maintained throughout the Plan period (provide calculations with and without windfalls).**

No comment.

**Introduce effective monitoring indicators and triggers to identify and respond to any significant failure to deliver housing at the required rate during the lifetime of the Plan.**

We consider that the proposed monitoring indicators are much improved. The Welsh Government will continue to work with the Council on improving the monitoring framework as the hearing session's progress.