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Eich cyf : Your ref FP25
Ein cyf : Our ref APP30-01-004/4
Dyddiad : Date **4th November 2009**

Dear Ms Kyte

Caerphilly CBC Local Development Plan 2006-2021
Consultation on Addendum to the Deposit Plan: Statement of Focussed Changes

Thank you for your letter of 22nd September. We note that the Statement of Focussed Changes is accompanied by an SA/SEA assessment of the proposed changes.

The matter of whether a plan is considered 'sound' will be for the appointed Planning Inspector to determine. We have considered the proposed Focussed Changes in the light of the representations we made to the deposit plan and in accordance with the consistency and coherence & effectiveness tests (principally in accordance with whether satisfactory regard has been given to national planning policy - test C2).

Accordingly, we have specific representations with regard to 4 of the proposed changes as detailed in the attached annex. We have also raised serious concerns about the 10 proposed changes that have been made against officer recommendation without any planning rationale having been provided. We have not provided any representation where a Focussed Changes does not address our earlier deposit plan representations and we do not object to the change proposed.

Yours sincerely

Mark Newey
Joint Head of Plans, Management and Performance
Planning Division

(enclosure – annex)



Annex to WAG letter (4th November 2009) in response to the Caerphilly LDP Consultation on Addendum to the Deposit Plan: Statement of Focussed Changes

FC01 Strategic Policy 17 & Supporting Text – Affordable Housing Target ; & FC02 Policy CW14 & Supporting Text – Affordable Housing Planning Obligation

We have considered the proposed focused changes to policies SP17 and CW14 and to their supporting text (FC01 & FC02) in relation to our previous comments on the deposit plan. We have also had regard to the information provided in the Council Report on Consultations Volume 1 (September 2009).

Affordable housing provision continues to be a priority Ministerial concern and the Assembly Government is keen to maximise the level of provision.

The deposit plan had a policy target of delivering 1,360 affordable dwellings through planning obligations. The focussed changes propose that policy SP17 include an authority-wide target of 3,800 affordable dwellings that can be delivered through a variety of means, but does not give the number to be delivered through the planning system by means of planning obligations; the supporting text advises that this will be 950. In addition, the area targets in policy CW14 have been reduced in most areas to 40%, 25% and 10% for revised identified areas and with no requirement in the Heads of the Valleys Regeneration Area; thresholds remain unchanged.

The reason given for the focussed changes are that they are based on findings of the Affordable Housing Viability Assessment and on national planning guidance that viability should be considered when setting affordable housing targets and thresholds.

We note that whilst information on the viability assessment has not been provided with the Focussed Changes Consultation, it has been provided as part of the evidence base in the LDP submission documentation package (7 October 2009), i.e. Supplementary Paper 4, Affordable Housing Viability Assessment (September 2009) and Supplementary Paper 5, Affordable Housing Target (September 2009) to the Background Paper 6 Population and Housing (October 2008).

The viability assessment work and the availability of these Supplementary Papers to Background Paper 6 on Affordable Housing will greatly assist discussions at the examination. However, the viability assessment reflects current market conditions and the policy (including the affordable housing target) should be flexible to allow for future changes in the market. Although this is recognised in Supplementary Paper 4 and in the revised supporting text for Policy CW14 in relation to site-specific requirements, it is not reflected in policy SP17.

It is noted that data from the 2008 Local Housing Market Assessment (LHMA) indicates that need for affordable housing has increased to 706 dwellings per annum (10,590 over the plan period). The Council is seeking to deliver 3,800 affordable homes (through all delivery mechanisms). This represents 36% of the need identified in the 2008 LHMA. The increased need combined with the outcome of the viability assessment (i.e. reduced delivery of affordable housing) would suggest that more land needs to be allocated for housing to enable more affordable housing to be delivered through the planning system. However, no further housing land allocations are proposed. According to the Council Report on Consultations Volume 1, the authority's view is that "further land does not need to be allocated as a significant proportion of affordable housing is being delivered ... throughout the plan period." A review of the use of areas subject to local non-statutory landscape designations, for example, has therefore not been carried out.

The above factors therefore suggest that the ability (and flexibility) of the strategy to deliver appropriate amounts of affordable housing over the plan period remains to be fully addressed.

Policy SP17 should provide an authority-wide target for the affordable housing to be delivered through the planning system (TAN 2, paragraph 9.1) rather than a target for affordable housing that can be delivered through a variety of means, including through the planning system. The information on overall delivery of affordable housing could usefully be included in the supporting text.

In addition, the focussed changes do not quantify the actual levels of identified need for affordable housing (paragraph 9.2.23 of *Planning Policy Wales*). Although the Council Report on Consultations Volume 1 recognises that this should be referred to in the LDP, no change has been made.

Policy CW14 contains affordable housing site-specific targets related to 3 specified areas excluding the Heads of the Valleys Regeneration Area. These areas relate to sub-market areas rather than the LDP strategy areas; consequently it is not clear as to how plan users will be able to identify all of these specific areas. Mapping is required; the greatest clarification would be by changes to the proposals map otherwise the Strategy Area Maps in the Deposit Plan could be amended to indicate the areas.

FC03 New CW Policy – Water Protection

The policy largely repeats national policy on protecting water resources and quality. It is not clear from the Focussed Changes document itself whether there are particular circumstances which need reflecting in the plan, or whether particular evidence has been put forward which would warrant a particular approach in the plan towards protection of the water environment. As drafted the policy is general and adds little value over and above national planning policy.

FC19 Proposals Map – Minerals Safeguarding

We support Focussed Change FC19 which accords with part of the Minerals Statement of Common Ground July2009.

FC04, FC07, FC08, FC09, FC10, FC11, FC12, FC13, FC15, FC16

These 10 proposed changes have been made against officer recommendation without any planning rationale having been provided. We consider that these changes must be unsound and the original position should be reflected in the plan.

It is not clear whether the implications of the proposed housing deletions for affordable housing have been accounted for in FC01/02.
