

WELSH GOVERNMENT
Examination Hearing Statement

Merthyr Tydfil
Local Development Plan Examination

Hearing Session 3 – 26th June 2019

Housing

Matters & Issues

3.1. Housing requirement and affordable housing (policies SW1 and SW2)

a. Is the housing requirement of 2,250 units over the Plan period appropriate and founded on robust evidence?

This is a matter for the Authority. The Welsh Government is supportive of the level of housing growth in the plan.

b. Does the identified housing requirement sufficiently respond to Merthyr Tydfil's status as a 'primary key settlement' in the Wales Spatial Plan?

This is a matter for the Authority. Please see our response to Hearing Session 1 Question 1.1.e

c. The identified affordable housing need for 5,490 dwellings is based on the 2014-19 Local Housing Market Assessment (LHMA). What are the practical implications for this Plan, if any, of an updated LHMA not yet being available?

This is a matter for the Authority.

3.2. Housing supply (including policy SW3)

a. The Plan makes provision for 2,820 homes during the plan period. Is the flexibility allowance of 570 units (around 25% above the requirement) appropriate?

This is a matter for the Authority

b. Appendix 1 of the Plan indicates that development is now complete on some site allocations (SW3.2, SW3.12, SW3.13, SW3.18, SW3.27). Some are under construction in whole or part (SW3.25, SW3.26 and SW3.29) and two have full planning permission (SW3.16 and SW3.28). Has double-counting been avoided in the calculation of components of housing supply?

This is a matter for the Authority.

c. Is the large site windfall allowance appropriate? Specifically, has double-counting been avoided where sites gained planning permission prior to being allocated in the current adopted Local Development Plan?

This is a matter for the Authority. The Welsh Government has no concerns on the large windfall allowance and considers that the Council has avoided double-counting by clearly evidencing and setting-out all housing components in Table 2 of the LDP.

d. Several site allocations which have not commenced implementation have been carried over (in whole or part) from the adopted Local Development Plan. For all these sites, delivery timescales (including first housing completions) have been delayed by between 2 and 7 years relative to the adopted Plan, and in most cases unit numbers have been reduced.

i. Is there a realistic prospect of these sites delivering housing units according to the new timescales indicated in the housing trajectory?

This is a matter for the Authority.

To clearly demonstrate the phasing and delivery of all housing sites over the lifetime of the plan, the Welsh Government supports the Council including the trajectory and accompanying land supply table in Appendix 2 of the LDP (as proposed by FC9).

ii. In combination these sites account for over a third of the Plan's housing requirement. Should these 'carried over' allocations be subject to a specific monitoring indicator which would trigger a partial revision to the Plan or other proactive measures by the Council if they are not progressed as envisaged?

Allocations 'carried over' from a previous plan should have been subject to the same detailed Candidate Site assessment process as all other allocations to robustly demonstrate their delivery and financial viability. As this is the case, a site-specific monitoring indicator is not required unless the allocation is key to delivering the plans strategy. The nature of any future plan revision will need to consider evidence in the-round in published Annual Monitoring Reports (AMRs) and should not relate to one indicator alone but a series of indicators linked to achieving the plan aims and objections.

e. Paragraph 6.5.25 of the Plan states that the number of units proposed for each site is based on an assessment of "appropriate density". Has the right balance been struck between seeking an efficient use of land whilst not overestimating site capacities?

This is a matter for the Authority

3.3. Specialist housing needs

a. The LHMA estimates that around 7-20% of new affordable housing will need to be supported or adapted for older people, and that remaining demand for housing suitable for older people should be met by the private sector²⁵. How would the Plan secure housing suitable for older people in all tenures and monitor progress in this area?

This is a matter for the Authority
