

Merthyr Tydfil Replacement Local Development Plan (2016-2031)

EXAMINATION MATTERS, ISSUES AND QUESTIONS

Representor ID Number 116 (HBF)

MATTER 3: HOUSING

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?

The HBF considers it is acceptable due to the way the housing requirement of the plan is currently dealt with. As identified by the Inspector in other questions the plan has a heavy reliance on windfall sites, previously allocated or 'rolled over sites' and one large strategic site (HSRA). Further the plan recognises that the development within the Merthyr area is challenging due to a number of constraints including ground conditions, former uses and topography.

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?

The HBF are concerned about the plan's heavy reliance on windfall sites as the delivery of these is even less certain than allocated sites. By their nature there is no guarantee that they will come forward, there is also a limited supply of such sites and often due to their location within urban areas there are other competing uses looking to secure the sites.

d. Several site allocations which have not commenced implementation have been carried over (in whole or part) from the adopted Local Development Plan. 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?

The HBF supports the Inspectors concerns on this point and agree that these sites should be clearly identified in the plan and monitored separately. The current LDP start date was 2006 so many of these sites have been allocated for development for over 10 years and have still not come forward for development. The HBF acknowledges that there has been both a recession and a period of recovery during this time, but do not consider that there are any other significant factors which alter the suitability of these sites for development and therefore the chances of them coming forward. If it is agreed that these sites should be monitored one suggestion would be that the Council agree a reserve list of alternative sites which can be called upon once certain agreed triggers are reached.

