



Merthyr Tydfil Replacement Local Development Plan 2016 - 2031

Examination Hearings

Merthyr Tydfil Heritage Trust

Submission 3:

Housing

Population growth forecasts and Local Housing Market Assessment

The Heritage Trust expressed concern early in the LDP process by writing to MTCBC to warn that its whole case for LDP review appeared to be based on out-of-date population projections. Put simply, the LDP 2006-2021 set out an ambition for a population increase of some 3,000 to 59,000. This had been achieved.

We pointed out that the official forecast was for no growth over the LDP period to 2031.

Our view is that extrapolating new forecasts from more recent Welsh Government population projections was not the right way for MTCBC to go.

The result is that the LDP ambition of population growth does not fit in with other plans and strategies – the Cwm Taf Local Well-being Plan (2017) splits the area into its local authority component areas and reports slight population growth for Rhondda Cynon Taf and no growth for Merthyr Tydfil. MTCBC is, of course, a partner in the Cwm Taf board and fully signed off to the plan.

The lack of a Local Housing Market Assessment has serious implications not just for the Inspector and LDP at examination – but for MTCBC and all social housing providers. A new LHMA is needed regardless of the LDP – and the opportunity to consider the changing housing situation and changing housing demands and needs over the 5 years since 2014 must be grasped.

The identified housing requirement

The Heritage Trust does not accept that the MTCBC identified housing requirement – which more or less puts us back to the house-building ‘enhanced growth’ target of the LDP 2006-2021 but 10 years further down the line – is backed by the available evidence.

Nor were the ‘doom and gloom’ scenarios put forward within MTCBC to justify their manufactured population projections backed by evidence (school pupil forecasts, health statistics) – at least we have not seen any evidence through the LDP process or elsewhere.



Housing supply, including components of supply and housing trajectory

The Heritage Trust is of the view that the housing trajectory needs careful examination and review – and that MTCBC should make available viability assessments (the results of the JHLAS survey work as a minimum). This might be useful to the Inspector – and MTCBC itself.

Specialist housing needs

We have learned that Welsh Government statistical forecasting of detailed household projections has been carried out. A report setting out the range of housing is imminent. This should be considered as soon as it is published – its findings might assist with the LHMA work.

We've not seen any evidence of the need for specialist housing needs in the LDP – although there were calls for assessments at least in the truncated stakeholder working party process of 2017.

RT 10-06-19