



Memo

Our ref 30819/GW/SC
Date August 2012
Subject Brecon Beacons LDP Examination: Housing Supply

1.0 Introduction

- 1.1 In order to ensure that all relevant points are taken into account, this note provides a response to the Inspector’s Preliminary Notes (1 and 2) in relation to the raised housing supply issues.
- 1.2 This note provides a written response to individual issues raised and, where appropriate, refers to the specific paragraphs of the NLP ‘Housing Supply Assessment’.

Preliminary Note 1 Paragraph Number	Task/Query	BBNPA Response
18	Update housing supply figures with those contained in the latest JHLAS.	See Appendix 1 of the ‘NLP Housing Supply Assessment’. It considers the figures included in the latest JHLAS (June 2011) as well as LDP allocations.
19	Clarify the situation in terms of: <ul style="list-style-type: none"> i. Allowance that has been given to windfall sites ii. Allowance that has been made for housing on mixed use sites; and, iii. Completions since the start of the Plan period. Set out the implications of these completions in terms of the on-going 5-year housing 	<p>Tables 6.1 and appendix 1 set out the revised housing land supply for the BBNPA. This includes clarification of the:-</p> <ol style="list-style-type: none"> 1. Windfall allowances 2. Mixed-use site allowance is set out in Section 3 (although this is subject to member scrutiny and will form part of a forthcoming focussed change) 3. Completions since the start of the Plan (2007).

	requirements.	Paragraphs 3.21-3.24 of the 'NLP Housing Supply Assessment' include a residual calculation setting out the scale of the five year requirement from the 2011 JHLAS base date.
20	Identify the housing requirement to 2016 and provide details of all sources of supply over this period in order to demonstrate the extent to which an adequate supply exists over this period.	As above paragraphs 3.21 -3.24 set out the residual 5 year requirement from 2011 -2016 and potential sources of supply to meet this requirement. Table 6.1 and appendix 1 of the 'NLP Housing Supply Assessment' set out full details of all sources of supply over the LDP period.
21	Provide details of any flexibility margin that has been applied to the housing supply and any reserve sites that might be released in the event that housing delivery does not come forward at the anticipated rate.	No flexibility margin has been applied however the BBNPA does anticipate a potential increase in windfalls during the Plan period, arising from forthcoming school closures within the BBNPA (see paragraph 6.7 in Housing Supply Assessment for details).
22	Explain the approach that has been taken in respect of brown and greenfield allocations. How many units are expected to come forward on brownfield sites in the Primary and Key Settlements? What is expected to happen to the former Talgarth Hospital Site and Cwrt Y Gollen site?	Appendix 1 of the 'NLP Housing Supply Assessment' clarifies which of the LDP allocations are located on brownfield sites. No new LDP allocations are proposed to be made on both the Talgarth Hospital Site and the Cwrt-y-Gollen Site although it is recognised that the Talgarth Hospital Site is currently subject to a mixed-use (housing, employment and community uses) planning application (LPA Refs 12/07922/FUL, 12/07690/CAC and 12/07795/FUL).
34	What justification is there to support the provision of new housing in Level 4 settlements?	There are no new housing allocations within Level 4 settlements.
Preliminary Note 2		
59	Provision of breakdown in Policy SP5 listing allocations according to settlement hierarchy, constraints and phasing. An additional listing showing completions, commitments, mixed-use site and windfall dwelling	Appendix 1 of the NLP Housing Supply Assessment shows the LDP allocations according to settlement hierarchy and allocations with permissions. Table 6.2 of the NLP Housing Supply Assessment shows completions,

	contribution according to settlement hierarchy.	<p>commitments and new allocations by settlement.</p> <p>Table 6.1 of the NLP Housing Supply Assessment shows the windfall allowance used to calculate the revised housing land supply figure.</p> <p>Revised comments have been received from DCWW regarding constraints and the BBNPA is timetabled to up-date Appendix 2 'Requirements of Development' of the Composite LDP (as part of a forthcoming focussed change) to take into account these revised comments.</p> <p>A forthcoming focussed change to the LDP will seek to remove reference to phasing of LDP housing allocations.</p>
60	Table setting out likely phasing of development	A forthcoming focussed change to the LDP will seek to remove reference to phasing of LDP housing allocations.
61 & 62	Evidence to justify the windfall assumption of 498 over the Plan period and demonstrate delivery.	<p>This 498 figure has been superseded and this will be subject to a forthcoming focussed change.</p> <p>Table 4.1 of the 'NLP Housing Supply Assessment' shows the historic (large-sites of 5 or more dwellings) windfall rate in the BBNP (15 dwellings pa since 2001). This has been used to justify a revised windfall allowance of 165 dwellings 2011-2022.</p>
63	Clarification of dwelling contribution of mixed use sites	See Table 3.4 of NLP 'Housing Supply Assessment' however please note these are subject to member scrutiny and will be published as an LDP focussed changes in due course.
Preliminary Note 1 Para	Additional Evidence	
45	<p>Details regarding the anticipated housing supply:</p> <p>i. A table setting out all of the allocations by settlement and listing the number of dwellings that</p>	<p>Appendix 1 of the NLP Housing Supply Assessment sets out the full details of the anticipated housing supply.</p> <p>The BBNPA has received up-dated information from DCWW on the</p>

	<p>are anticipated, when they will be delivered, and what constraints to delivery exist.</p> <ul style="list-style-type: none"> ii. A table setting out the number of completions to date during the Plan period by settlement. iii. A table setting out the number of commitments by settlement and indicating when planning permission was granted, whether the permission is subject to a S106 agreement, whether there are any constraints, and how many units are expected to be delivered. iv. A table setting out the number of units that are likely to come forward from mixed sites and windfalls and the relationship between this supply and the settlement hierarchy. v. A table setting out the anticipated phasing of housing delivery. 	<p>site constraints. Details of these comments will be published as part of a focussed change to Appendix 2 of the LDP ('Requirements of Development') 'in due course.</p> <p>A forthcoming focussed change to the LDP will seek to remove reference to phasing of LDP housing allocations.</p>
47	<p>Provide evidence to justify the deviation from the WAG household projections and the BBNPA housing requirement figure and how BBNPA will meet its targets with reference to:</p> <ul style="list-style-type: none"> i. Past trends; ii. Past delivery of exception sites; and, iii. The anticipated delivery of windfall sites. 	<p>Table 6.1 of the NLP Housing Supply Assessment includes a summary of the LDP's housing land supply, drawing upon delivery of windfall sites. It has not been possible to separate out exception sites as these have not been individually monitored.</p>