

Blaenau Gwent County Borough Council
Cyngor Bwrdeisdref Sirol Blaenau Gwent



(Updated) Population & Housing Background Paper **Papur Cefndirol Poblogaeth a Thai (Wedi'i Ddiweddarau)**

Deposit Local Development Plan
Cynllun Adeneuo Datblygu Lleol

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Appendix 1: Memorandum of Understanding



1.0 INTRODUCTION

Aim of this Paper

- 1.1 The aim of this paper is to set out the background and evidence for the Housing Requirement figure.

Overview of how this Paper fits into Plan preparation

- 1.2 This paper will provide information for Officers and Members of the Authority, stakeholders, members of the public and the Inspector to help explain the approach taken to housing. Affordable Housing is dealt with in a separate background paper.

Context

- 1.3 The planning system is charged with providing a continuous supply of land to meet society's needs. In order to deliver these needs, the Council must determine the level of population at the end of the Plan period. Population and housing are topics that are at the heart of the Local Development Plan. Housing is important to us all; it is a basic human need, it is also the largest single land-use that has to be allocated in the Plan.
- 1.4 This Topic Paper examines:
- The Policy Context
 - Population and House Building Trends
 - Housing Requirement
 - Explanation of Housing Land Calculation
 - Explains how the aims, objectives and policies have been formulated through consultation.
 - Sets out the Deposit Plan policies which have evolved through the process.

Appendix 1 is a copy of the South East Wales Regional Apportionment Memorandum of Understanding

2.0 POLICY CONTEXT

NATIONAL

- 2.1 In predicting future housing requirements, the Council is guided by national policy and guidance.

Planning Policy Wales (2011 Edition 4)

- 2.2 Planning Policy Wales (PPW) sets out the land use planning policies of the Welsh Assembly Government. It is supported by a series of Technical Advice Notes (TANs). PPW is national policy and local government is obliged to take the requirements into account when preparing development plans.

- 2.3 The Assembly Government's vision for housing is for everyone in Wales to have the opportunity to live in good quality, affordable housing, to be able to choose where they live and decide whether buying or renting is best for them and their families. The objectives are to provide:

- Homes that are in good condition, in safe neighbourhoods and sustainable communities; and
- Greater choice for people over the type of housing and the location they live in, recognising the needs of all, including those in need of affordable or special needs housing in both urban and rural areas.

(Paragraph 9.1.1, PPW 2011).

- 2.4 In planning the provision for new housing, local planning authorities must work in collaboration with housing authorities, registered social landlords, house builders, developers, land owners and the community and take account of the following:

- People, Places, Futures – The Wales Spatial Plan;
- Statutory Code of Practice on Racial Equality in Housing – Wales;
- the Assembly Government's latest household projections (which should be a starting point for assessing housing requirements);
- local housing strategies;
- community strategies;
- local housing requirement assessments (needs and demands);
- the needs of the local and national economy;
- social consideration (including unmet need);
- the capacity of an area in terms of social; environmental and cultural factors (including consideration of the Welsh language) to accommodate more housing;
- the environmental implications, including sustainable building standards, energy consumption and greenhouse gas emissions and floodrisk;
- The capacity of the existing or planned infrastructure; and
- The need to tackle the causes and consequences of climate change.

(Paragraph 9.2.1, PPW 2011)

- 2.5 The latest Assembly Government local authority level Household Projections for Wales should form the starting point for assessing housing requirements. Local

planning authorities should consider the appropriateness of the projections for their area, based upon all sources of local evidence, including the need for affordable housing identified by their Local Housing Market Assessment. Where local planning authorities seek to deviate from the Assembly Government projections, they must justify their own preferred policy-based projections by explaining the rationale behind them.

Technical Advice Note 1: Housing Land Availability (June 2006)

- 2.6 This document provides guidance on the preparation of Joint Housing Land Availability Studies (JHLAS). The purpose of these studies is to:
- Monitor the provision of market and affordable housing
 - Provide an agreed statement of residential land availability for development and control purposes; and
 - Set out the need for action in situations where an insufficient supply is identified.

Wales Spatial Plan – People, Places, Futures (July 2008)

- 2.7 The Wales Spatial Plan forms one of the high level strategic ‘building blocks’ of the Welsh Assembly Government it is a material consideration for Local Planning Authorities, who are statutorily obliged to take account of the objectives, aims and requirements in developing their Local Development Plans.
- 2.8 The Wales Spatial Plan sets out a vision of how each part of Wales should develop economically, socially and environmentally in the future. It guides the way the Assembly Government will spend its money over the coming years. The Wales Spatial Plan reinforces the Welsh Assembly Government’s commitment to developing a sustainable future for Wales, including the statutory duty to promote sustainable development in all its work. Blaenau Gwent is within the South East Wales – Capital Region. The vision for the area is:

‘An innovative skilled area offering a high quality of life – international yet distinctively Welsh. It will compete internationally by increasing its global visibility through stronger links between the Valleys and the coast and with the UK and the rest of Europe, helping to spread prosperity within the area and benefiting other parts of Wales.’

- 2.9 Blaenau Gwent along with the neighbouring Authorities of Merthyr Tydfil, Monmouthshire, Torfaen, Rhondda Cynon Taf, Caerphilly, Cardiff, Bridgend, Newport and the Vale of Glamorgan have worked together to identify more detail on how the area is to develop in the future. The Capital Region has been broken down into three areas, Heads of the Valleys Plus, Connections Corridor and the City Coastal Area.
- 2.10 Blaenau Gwent is within the Heads of the Valleys Plus area: an area recognised as facing some of the greatest economic and social change challenges created by economic restructuring of the late 20th Century. In terms of ‘Building Sustainable Communities’ Ebbw Vale is identified as being a key settlement that has a critical role to play in the success of the Capital Region. It must be successful in its own

right and, where appropriate, function as a service and employment hub for smaller settlements. It will provide the central framework around which high capacity sustainable transport links will be developed. Other settlements in the area need modern shopping, leisure, community and cultural facilities, more attractive and affordable housing, clean vibrant town centres, accessible open countryside and employment opportunities

Better Homes for People in Wales (2001)

- 2.11 'Better Homes for people in Wales' is the national Housing Strategy, which provides a vision for the future of Welsh housing and a clear policy framework to facilitate action at the local level. It also addresses its relationship with the planning system. The Strategy sets out the vision for housing in Wales as: *"We want homes that are in good condition in safe neighbourhoods. We want better housing services and a greater choice for people over the types of housing and locations they live in."*

National Housing Strategy – 'Improving Lives and Communities – Homes in Wales' (2010)

- 2.12 This document sets out the challenges, priorities and the actions for the coming years so that more can be done for people, particularly older people and others who may be vulnerable.
- 2.13 The challenges are:
- i The demand for housing continues to outstrip supply, which needs to be met by new houses and by bringing back into use empty properties.
 - ii The credit crunch has increased the demand for affordable housing.
 - iii The ageing population has significant implications for the design of houses and the support available to help people to live independently for as long as possible.
 - iv The age and quality of current social housing stock means that substantial improvement is required, not least on energy efficiency. Stock transfers are addressing this in some areas.
 - v There is increased demand on housing and housing-related support services, including those that deal with homelessness.
- 2.14 The approach is about improving people's lives. It will:
- i Provide more housing of the right type and offer more choice.
 - ii Improve homes and communities, including the energy efficiency of new and existing homes.
 - iii Improve housing-related services and support, particularly for vulnerable people and people from minority groups.
- 2.15 The Action will:
- i Increase the number of affordable homes for purchase or rent, in the right location and specifically in rural areas.

- ii Increase the level of private sector investment in housing.
- iii Improve the quality and standard of all existing houses and rented accommodation, including their energy efficiency.
- iv Give people more choice by broadening the range of homes and tenancy arrangements to suit people's income and circumstances.
- v Give tenants a clear voice in decisions that affect them.
- vi Make it easier for people to find suitable accommodation, particularly people from minority groups.
- vii Ensure services reflect the needs of those who use them not the needs of organisations that deliver them.
- viii Make best use of investment in housing and other regeneration activity to create more jobs and training opportunities, and to improve the look and feel of communities, and the services and facilities available to local people.

2.16 Investment in housing and housing related support services does not only meet people's needs for a home. It brings with it benefits for the economy, for jobs and training opportunities, for people's health and well being, and for the environment. It also helps tackle poverty and inequalities and opens up new opportunities for people.

The National and Sub- National Population Projections for Wales (2005)

- 2.17 The National and Sub-National Population Projections for Wales (2005) indicate that there are likely to be a number of significant changes in the profile of the population of Wales and South East Wales in the period up to 2023. It is forecast that:
- Wales's population will increase by approximately 0.3% each year over the next 20 years, reaching 3 million by 2009.
 - The population of South East Wales will see a significant increase of 7.8% between 2003 and 2023. This will result in a rise of 110,000 in the population.
 - The population of people aged between 25 and 44 is set to increase by 6.2% in South East Wales.
 - There will be an increase in the number of people of 45 and above throughout Wales, with the largest increase in the oldest age group – 75 and over, reflecting improvements in life expectancy.

The National and Sub National Household Projections for Wales (2006)

- 2.18 The National and Sub National Household Projections for Wales (2006) reflect the projected changes in population. The projection identifies that:
- The total number of households in Wales is projected to increase by 20% to 1,478,500.
 - The number of households in South East Wales will increase by 22%.
 - In general, the average household size is expected to continue to fall from 2.34 to 2.09 by 2023.

REGIONAL

- 2.19 The Local Development Plan must have regard to other strategies and policy documents produced at a sub-regional level in order to ensure consistency. This section seeks to review the key elements of strategies and studies that form part of the population and housing evidence base at a local level.

Turning Heads...A Strategy for the Heads of the Valleys 2020 (June 2006)

- 2.20 The Heads of the Valleys Strategy sets out a broad framework for change in the Heads of the Valleys area. The Strategy provides a framework for regenerating the area with a focus on 5 priority themes:
- An attractive and well-used natural, historic and built environment;
 - A vibrant economic landscape offering new opportunities;
 - A well-educated, skilled and healthier population;
 - An appealing and coherent tourism and leisure experience; and
 - Public confidence in a shared bright future.
- 2.21 The Heads of the Valleys Programme areas covers the whole of Blaenau Gwent.
- 2.22 The ambition is that, by the year 2020, the Heads of the Valleys will be a place where people want to live, work and play – with a sustainable, high quality of life and a thriving population. Loss of population is seen as a threat to the vibrancy and long-term stability of the area. (Turning Heads, page 4, 2006)


The Apportionment Process


- 2.23 In accordance with the requirements of the Ministerial Interim Planning Policy Statement (MIPPS), the Council, as part of the South East Wales Strategic Planning Group (SEWSPG) undertook the apportionment of the 2003-Based National and Sub-National projections.
- 2.24 On 5th March 2007, after regional considerations the Elected Members agreed the SEWSPG Memorandum of Understanding, attached at Appendix 1. In accordance with government guidance, the 10 constituent Local Planning Authorities and a broad range of stakeholders (including utility companies and environmental organisations) have agreed the figures.
- 2.25 Whilst the apportionment does not constitute a binding commitment on the Council, the agreement means that the Council has met its requirements in terms of the MIPPS.
- 2.26 Part 2 of the SEWSPG Memorandum indicates an apportionment of 3,000 dwellings to Blaenau Gwent for the Plan period (2006-2021), which was in line with the Preferred Option for the Preferred Strategy. At this time the Council used the 'Chelmer Housing and Population Model' to identify the dwelling requirement figure for achieving a population of 71,151. The model indicated that 3,000 houses were required over the 15 year period.


LOCAL


Making a Difference – The Big 20 Year Plan for Blaenau Gwent 2010 to 2030


2.27 The Community Strategy builds on the work undertaken by the Community Plan and takes forward the Vision of making: Blaenau Gwent a better place to live, work and visit. The Community Strategy has 7 key themes and each theme has its own vision:

 **Lively and Accessible Communities**
Creating communities that people enjoy and want to live in

 **Thriving Communities**
Offering the opportunities, support and resources in our communities for people to thrive

 **Fair and Safe Communities**
Making people feel safer and included in our communities

 **Learning Communities**
Giving people the skills to succeed

 **Healthy Communities**
Helping people to be healthy and get the right care and support when they need it

 **Green & Sustainable Communities**
Improving our environment today for tomorrow

 **Leading Communities**
Working with, and for our communities

2.28 Housing is under Lively & Accessible Communities and the aim is to make suitable housing available for people. This will be achieved through improving the quality of housing, making available an appropriate mix of housing types and size to meet need and ensuring that housing is affordable.

Blaenau Gwent Local Housing Strategy – Quality Streets (2007-2012)

2.29 The overall aim of the Local Housing Strategy is to:-

“provide a strategic framework to ensure that everyone in Blaenau Gwent has the scope and choice to attain a home that is decent, affordable and is situated in a healthy and safe environment.”

2.30 The Strategy sets key housing objectives across tenure for the period to 2012, together with an action planning framework for the achievement of those objectives. The objectives are based around:-

- Tackling Inequality
- Land Use Planning Framework
- Affordable Housing
- Private Sector Renewal Policy
- Sustainable Development
- Energy Efficiency
- Homelessness
- Supporting people

- Housing Management
- Community Regeneration

Local Housing Market Assessment (2007)

2.31 Opinion Research Services (ORS) was commissioned by Blaenau Gwent County Borough Council to undertake a local housing assessment, including a comprehensive study of current and future housing requirements and housing need. The assessment was undertaken to inform local policies, in particular relating to the housing strategy and investment programme and planning policies surrounding affordable housing provision. The following table summarises the housing market requirements identified in the report. If the 5 year requirement identified in the report continued over the plan period this would suggest that 3,807 houses are required in total.

Table 1: Blaenau Gwent Local Housing Market Assessment 5-year Requirement

Housing Type	Gross Housing Requirement	Housing Supply	Net Housing Requirement
Market	6,152	5,316	836
Intermediate	200	-	200
Social	3,259	3,027	233
Total	9,611	8,343	1,269

Source: Blaenau Gwent Local Housing Market Assessment (ORS, 2007, pp75)

Local Authority Population Projection for Wales (2006-based) (WAG 2008)

2.32 On 30 June 2008 population projections for the 22 Unitary Authorities Areas in Wales were published. A new approach has been used to develop the 2006-based local authority projections. This involved using local data and local trends, but not forcing the Local Authority projections to sum to the National Wales level population projection.

2.33 The results of the population projection work for Blaenau Gwent is as follows:

Table 2: WAG 2006 Population Projection for Blaenau Gwent (2008)

	2006	2011	2016	2021
Blaenau Gwent	69,341	69,739	70,472	71,129

(Source: Local Authority Population Projections for Wales; WAG Statistics for Wales 2008)

2.34 In recent years Blaenau Gwent has suffered from population loss through natural change as there have been more deaths than births. The WAG population projection forecast a change in this trend with more births than deaths being predicted due to an increase in the birth rate and an increase in life expectancy. These changes make up a large proportion of the rise in the population to 2021.

Table 3: Natural Change in Blaenau Gwent

	2010/11	2020/21
Births	900	800
Deaths	800	700
Change	100	100

(Source: Local Authority Population Projections for Wales; WAG Statistics for Wales 2008)

2.35 Changes from migration were projected as +31 per annum made up of +37 net UK migrants and -6 net overseas migrants.

Local Authority Population Projection for Wales (2008-based) (WAG 2010)

2.36 The 2008 projections identify that Blaenau Gwent will not reach the 71,100 population total until 2023. Natural change is expected to continue at +100 whilst net migration is considered to be negligible.

Table 4: WAG 2008 Population Projection for Blaenau Gwent (2010)

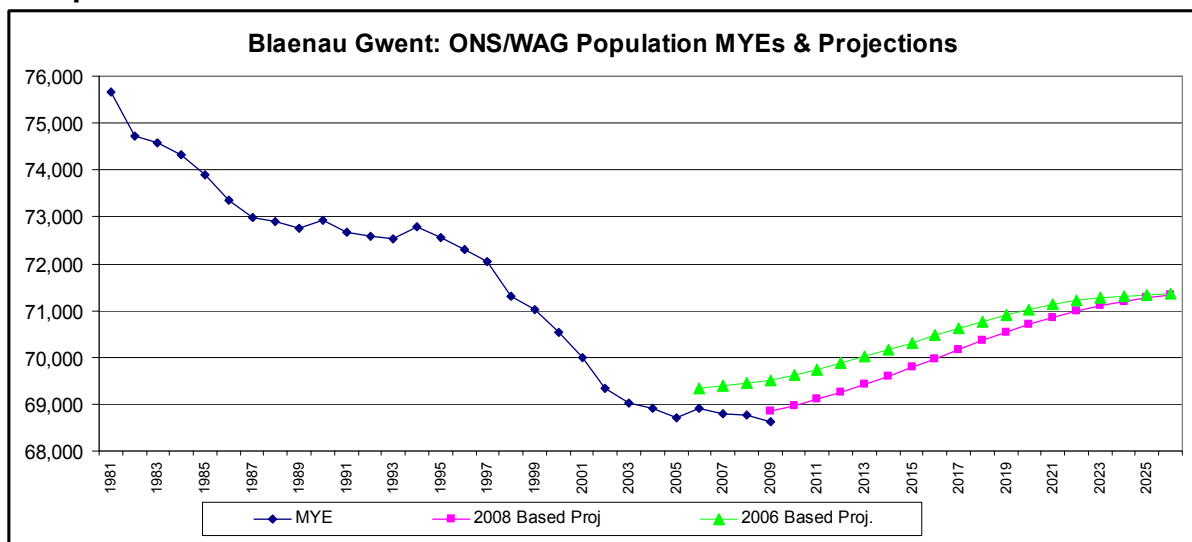
	2006	2008	2013	2018	2021	2023
Blaenau Gwent	68,914*	68,759	69,423	70,349	70,849	71,094

Source: Local Authority Population Projections for Wales; WAG Statistics for Wales 2010)

Source: 2006 figure from Revised Mid Year Estimates WAG Statistics

2.37 The new WAG 2008 projection identifies that at 2021 the population of Blaenau Gwent will be 70,849 which is 280 short of the 2006 projection. The population increase between 2006-2021 according to the 2008 based projections is 1,935 whereas the population increase, according to the 2006 based projections, between 2006-2021 is 1,788.

Figure 1: WAG Population Projection for Blaenau Gwent 2006 and 2008 Comparison



3.0 POPULATION AND HOUSE BUILDING TRENDS

POPULATION TRENDS

3.1 The population of Blaenau Gwent has been in decline since 1921 (see Figure 2 and Table 4 below). This loss of population has been caused by the decline in the coal and steel industries, leading to movements out of the Borough for people to find employment elsewhere. The latest major closure to hit Blaenau Gwent was the closure of the Ebbw Vale Steelworks which finally closed in 2002.

Figure 2: Population of Blaenau Gwent 1921-2001

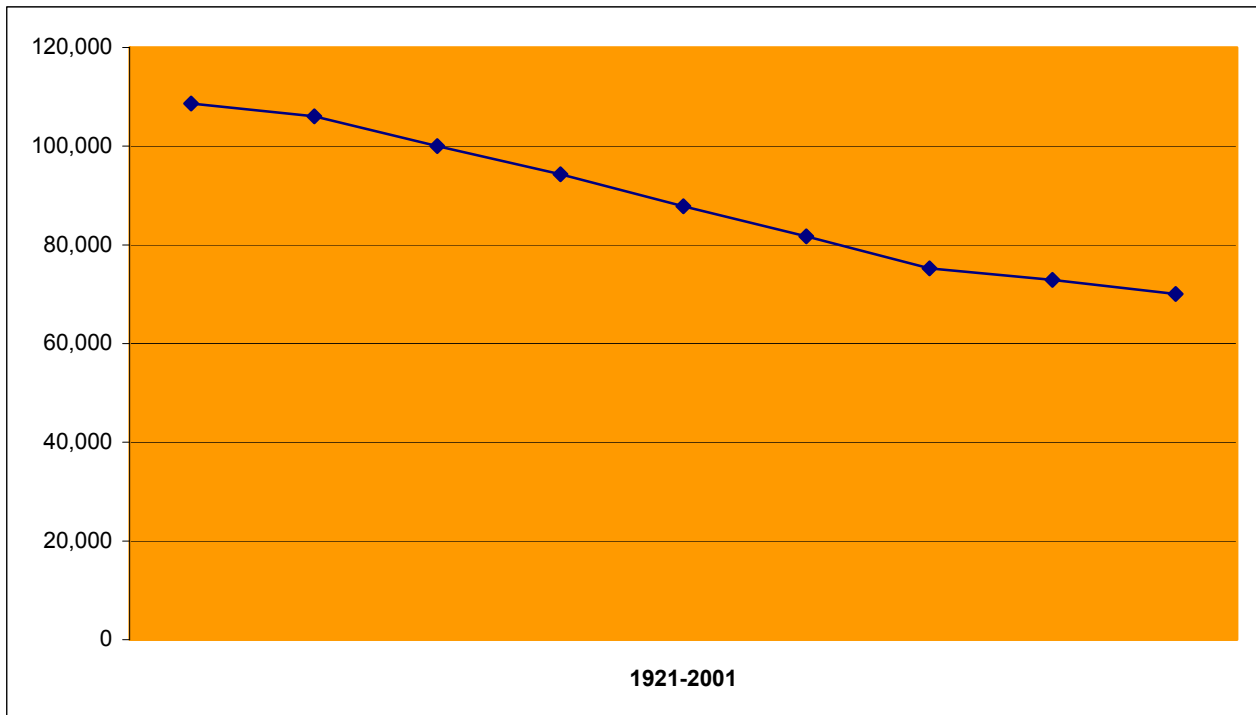


Table 5: Population of Blaenau Gwent 1921-2001

Year	Population	Population Loss
1921	108,660	
1931	106,030	2,630
1941	99,992	6,038
1951	94,342	5,650
1961	87,796	6,546
1971	81,712	6,084
1981	75,241	6,471
1991	72,918	2,323
2001	70,058	2,860

(Source: Census)

3.2 The previous table and figures identifies that, over the last thirty years, population loss has slowed from 654 per annum to 232.

3.3 According to the latest mid year estimates from Office of National Statistics, the last 5 years has seen a further slowing of population loss with some years experiencing positive change.

Table 6: Population Change for Blaenau Gwent 2001-2008 (2008)

2001	2002	2003	2004	2005	2006	2007	2008
70,000	69,453	69,240	69,295	69,111	69,341	69,200	69,100
Change	-547	-213	55	-184	230	-141	-100

(Source: ONS Mid Year Estimates)

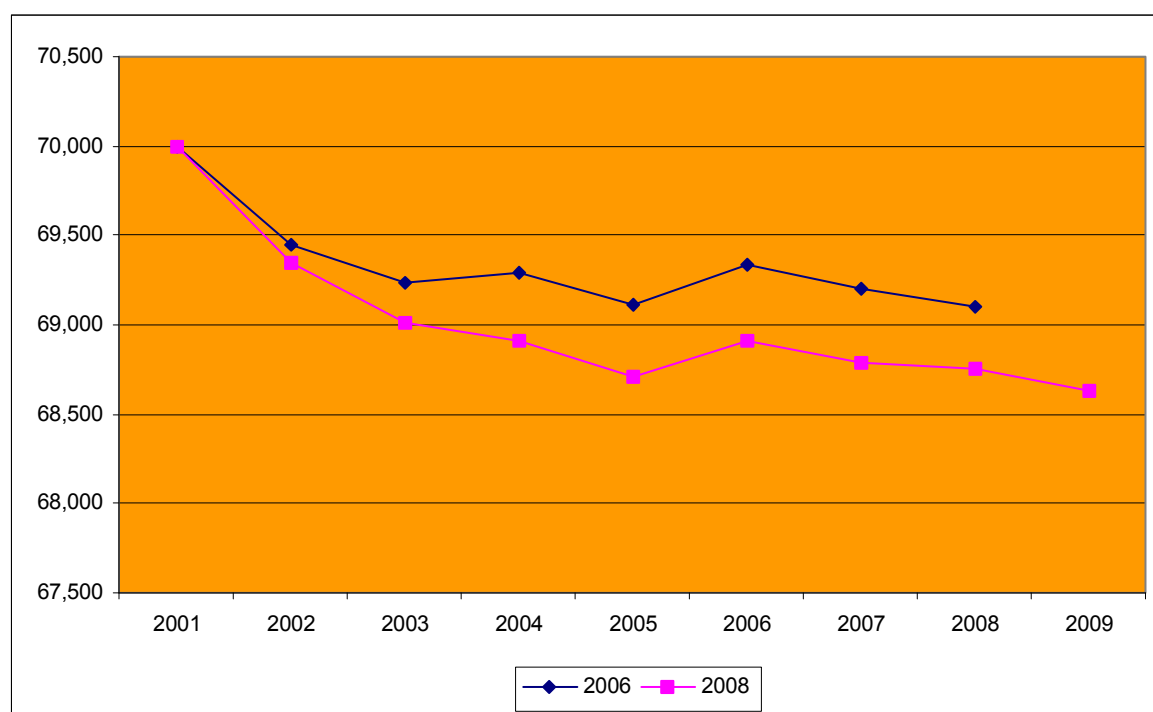
3.4 It was clear from the above table that the population loss experienced between 2001 to 2008 was stabilising. However, in 2010, revised mid year estimates were published and this identified a different picture for this period. It shows the population to be stabilising but at a lower level than thought. These changes have come about as a result of methodological improvements to the estimation of the distribution of international migrants between local authority areas and improved estimates of the migration of students (SB46/2010 WAG).

Table 6a: Population Change for Blaenau Gwent 2001-2009 (2010)

2001	2002	2003	2004	2005	2006	2007	2008	2009
70,000	69,350	69,013	68,911	68,709	68,914	68,787	68,759	68,630
Change	-650	-337	-102	-202	+205	-127	-28	-129

(Source: WAG Statistics)

Figure 3: Population of Blaenau Gwent 2001-2008 Mid Year Estimates



Source: WAG Statistics

Natural Change and Migration

3.5 Population changes can be broken down into two factors: natural change and net migration. Natural change is the difference between the numbers of births and deaths in the population, while net migration is the difference between those moving into and out of the area.

Natural Change

Table 7: Components of Natural Change in Blaenau Gwent 2001-2006

	2002	2003	2004	2005	2006	2007	2008	2009
Births	655	674	719	744	785	700	900	800
Deaths	917	877	917	854	806	800	800	800
Change	-262	-203	-198	-110	-21	-100	+100	0

(Source: ONS Mid Year Estimates and Stats Wales (figures from 2007 rounded))

3.6 An increase in births and a decline in the number of deaths mean that the natural change figure is moving from a negative value to a positive value. If this trend continues the population level of the Borough would increase as a result of natural change.

Migration

Table 8: Components of Migration in Blaenau Gwent 2001-2006

	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006
Internal - in	1,300	1,500	1,600	1,500	1,600
Internal - out	1,600	1,500	1,400	1,500	1,300
International - in	0	0	0	0	100
International - out	0	0	0	100	100
Total (Net)	-300	0	+200	-100	+300

(Source: ONS Mid Year Estimates please note these figures are rounded to nearest hundred)

3.7 It is clear from the above table that the number of people entering the Borough is increasing and the number of people leaving is reducing. If this trend continues Blaenau Gwent’s population would continue to increase.

Summary

3.8 Long term trends indicate that population loss is decreasing but more recent trends indicate that the population of the Borough is stabilising and has the potential to rise.

HOUSE BUILDING TRENDS

3.9 Table 8 and Figure 4 identifies that housing completions in Blaenau Gwent have fluctuated between 72 and 363 per annum over the past 30 years. The average number of completions per annum from 1980 to 2009 is 140.

Table 9: House Building Completions in Blaenau Gwent 1980-2007

Year	Housing Completions
1980	323
1981	363
1982	112
1983	72
1984	121
1985	84
1986	92
1987	138
1988	218
1989	132
1990	108
1991	273
1992	284
1993	126
1994	140
1995	235
1996	123
1997	136
1998	136
1999	44
2000	44
2001	106
2002	101
2003	102
2004	110
2005	126
2006	36
2007	73
2008	102
2009	150

(Source: JHLAS 2009)

Figure 4: House Building Completions in Blaenau Gwent 1980-2007

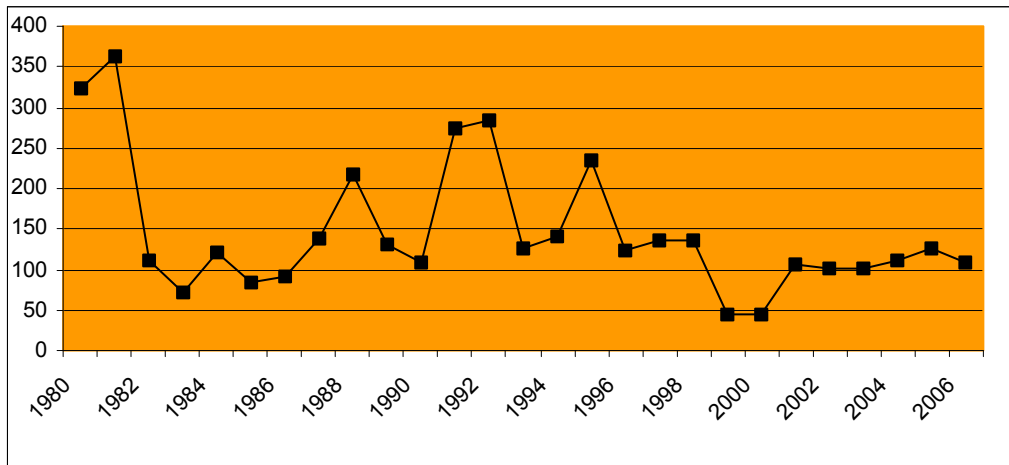


Table 10: Average House Building Completions in Blaenau Gwent

	1996-2009 (13.25 years)		2004-2009 (5.25 years)	
	TOTAL	AVERAGE	TOTAL	AVERAGE
TOTAL BLAENAU GWENT	1386	105	597	113

(Source: JHLAS 2010)

3.10 More recent trends indicate that building rates are averaging 105-113 per annum.

4.0 HOUSING REQUIREMENT

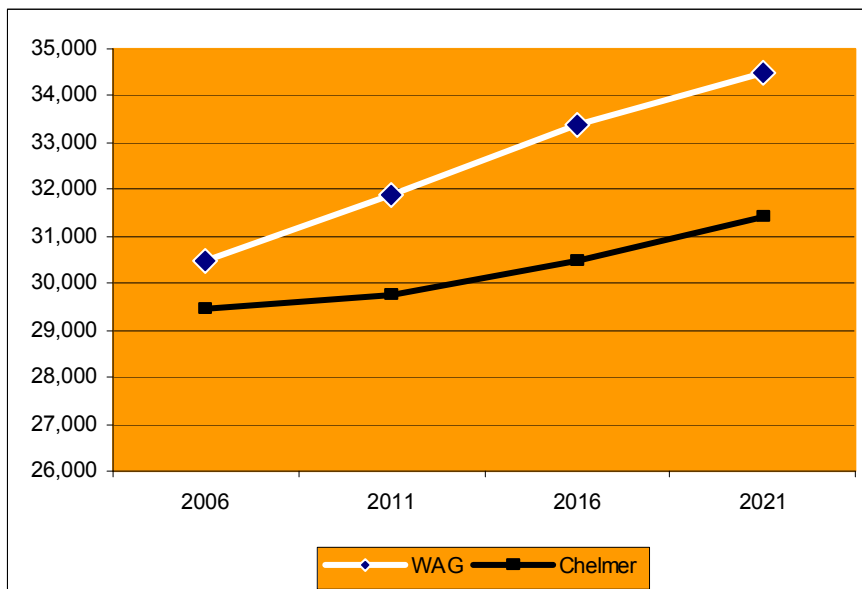
Preferred Strategy Stage

- 4.1 At the Preferred Strategy stage the favoured option was for growth with the aim of increasing the population to 71,151 by the end of the Plan period. This was based on a Chelmer 'dwelling led' projection which included a build rate of 150 per annum for the first 5-year period, 200 per annum for the second 5-year period and 250 for the final 5-year period. This was a policy based trend projection based on evidence of change over the last five years. This was in accordance with the aims of the Wales Spatial Plan, the Heads of the Valleys Programme and Blaenau Gwent County Borough Council plans to regenerate Blaenau Gwent. This, relatively high figure was also supported by the longer-term evidence of house building rates. Further information on how the options were prepared and consultation responses received is in section 6.
- 4.2 This was also in accordance with the Welsh Assembly Government Population Projections for Blaenau Gwent which were released following completion of this work. Blaenau Gwent had estimated that the population would rise to 71,151 in 2021 and the WAG projection estimated it would rise to 71,100.

Household Projections for Local Authorities in Wales (2006-based) (WAG 2009)

- 4.3 In June 2009 the Welsh Assembly Government published new Household Projections for all Local Authorities in Wales. The Local Household Projection for Blaenau Gwent identified that the number of households would rise from 30,435 in 2006 to 34,535 in 2021. This amounts to an increase of 4,082 households over the Plan period.

Figure 5: Comparison of WAG 2006 & Chelmer Household Projections



- 4.4 Although, the population in the projection was the same as that which Blaenau Gwent was aiming to achieve and had used in its Preferred Strategy option, the number of households generated is much higher. The reason for the difference between the dwelling requirement in the Chelmer model and the WAG model is due to the way they are calculated. The WAG model uses sharing factors to identify the requirement, whereas Chelmer use head of household. When comparing the two it is clear that the Chelmer model figures result in higher sharing factors. The WAG projection expects the average household size to decrease from 2.25 in 2006 to 2.03 in 2021, the Chelmer model identified that the household size was 2.31 and would reduce to 2.14.
- 4.5 The Council, through the LDP Steering Group and LDP Forum re-considered its position on this issue. It was agreed that the housing requirement figure be increased to 3,000 - 4,082, as the aim of the Plan was to increase the population to 71,100. The idea behind the lower figure of 3,000 was to allow for the difference between the two methodologies.
- 4.6 The Welsh Assembly Government advised the Council that a range of 3,000-4,082 was too great whilst other objectors had issue with the approach of including flexibility. The Council undertook further work on the household requirement figure to identify a dwelling requirement figure for Blaenau Gwent. A figure of 3,666 was identified which is lower than the household requirement figure due to sharing factors and an allowance for the reduction in the vacancy rate to 4%. The following table identifies the methodology adopted to convert the household requirement into a dwelling requirement.

Table 11: Calculation of Conversion of Households to Dwellings

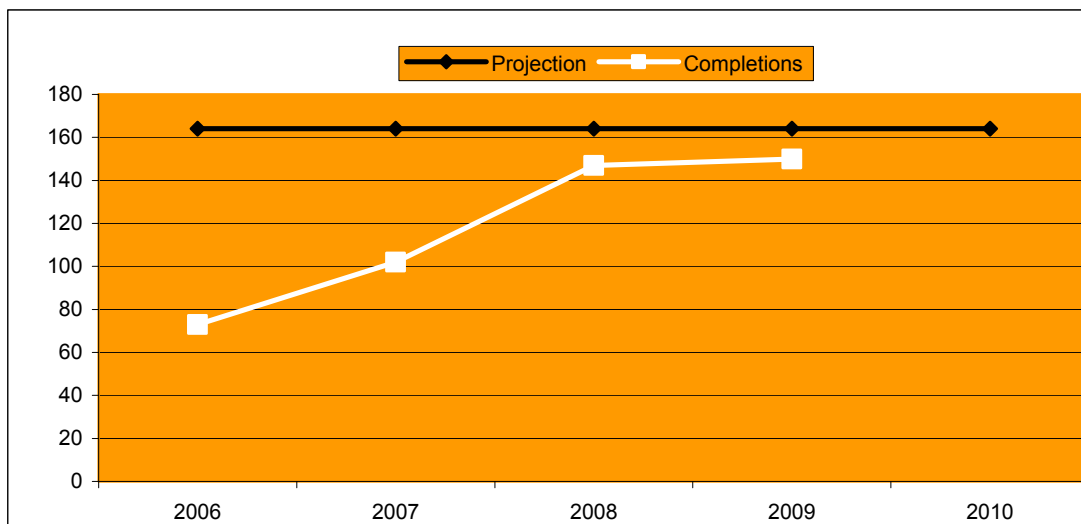
Ref	Topic/Factor	Note/Source	Figure*
	Households at 2006	WAG Household Estimates	30,453
	Dwellings at 2006	Calculated using basic Chelmer formula & 2001 census data	32,307
H	Households at 2021	WAG 2006 based proj	34,535
P	Sharing Rate (% of households sharing accomm)	2001 Census (SO490122/SO490001*100)	0.01
S	Sharing Factor (Households per shared dwelling)	2001 Census (SO490122/(SO49a0001-SO490012))	2.00
V	Vacancy Rate	Average	4.00
D	2026 Implied Dwelling Requirement	Basic Chelmer formula applied namely: $D = H [1-p/100(1-1/s)] / (1-v/100)$	35,973
	Additional Dwelling Requirement 2006-2021	2021 less 2006	3,666

4.7 The Housing requirement figure set in the Plan is 3,666 dwellings. This is based on the 2006 WAG Household Projection which has then been converted into a dwelling requirement. The Housing requirement figure has been distributed over three periods to enable building rates to gradually climb to higher levels and to take into account the current economic climate which is severely restricting private sector housing completions.

Local Authority Household Projections for Wales (2008 based) (WAG: 2010)

4.8 In September of 2010 WAG published 2008 based household projections which identify that by 2021 the number of households will increase to 34,208 - this is 327 below that anticipated by the 2006 based projections. Recently published Household Estimates for Blaenau Gwent (WAG 2011) identify that the number of households at 2006 was 30,283 which suggests that 3,925 new households will be formed between 2006-2021 which is 157 lower than the 2006 projection.

Figure 6: Comparison of Annual Dwelling Requirement and Completions



4.9 It should be noted that completions over the first few years of the plan are rising, though from a low base, but still fall short of the housing requirement figure set for 2006-2011. The rise is due to the increase in activity in the Social Housing Sector. If the private housing market sector improved then it would be possible to reach the higher figures set for the second and third period of the Plan.

5.0 EXPLANATION OF HOUSING LAND CALCULATION

5.1 In order to identify the amount of land the Council will be required to allocate for housing in the LDP, existing information on housing commitments and allowances for windfall sites, small sites, demolitions and conversions have been identified. This section explains the methodology for these calculations and identifies how much land would be required in order to meet the housing requirement figure.

A Existing Land Supply at 1st April 2009

5.2 The number of units with valid planning consents as at April 2009 was 1,707.

B Completions

5.3 The number of units completed on both large and small sites in the period from April 2006 to April 2009 is 325 (2007:73+2008:102+2009:150). This equates to the first 3 years of the Plan period.

C Windfall Sites

5.4 For the purposes of this calculation ‘windfall sites’ are defined as sites with a capacity of 10 or more units that have not been allocated for housing in the UDP or any other adopted Local Plan. The total number of completed units over a 5-year period has been counted, rather than the number of units with consent.

Table 12: Windfall Completions 2004-2009

YEAR	Windfall Completions
2004-2005	0
2005-2006	0
2006-2007	0
2007-2008	1
2008-2009	66
Total	67
Average Annual Figure	13

Source Adapted from Blaenau Gwent Joint Housing Land Availability Study

5.5 Whilst it is acknowledged that windfall sites are to a certain extent unknown, it is considered appropriate to use past build rates to estimate a future contribution from this source. A figure of 13 per annum has been identified through using past data.

5.6 The number of units likely to come forward as windfall sites is dependent on whether all possible sites are allocated within the Plan. Due to the timing of the decision on stock transfer it has not been possible to include housing owned land within allocations. This is because of the uncertainty of future proposals for the land if it were to be transferred. There is a possibility of 268 dwellings coming forward from this source. There are also plans to rationalise other public services such as schools, police and ambulance facilities which may, in future, release land for housing. It is suggested that the windfall figure is increased from 13 per annum to

26 per annum to take into account these possible sources. This would allow for a total of 400 houses coming forward from this source, which is 10% of total supply and comparable to other local authorities windfall allowances. The figure to be included in the LDP is $12 \times 26 = 312$.

D Allowance for Small Sites

- 5.7 The number of units completed on sites of less than 10 units is recorded as part of the annual Joint Housing Land Availability Study. Over a 5 year period 184 houses were delivered on small sites.

Table 13: Small Site Completions 2004 to 2009

Year	Number of Small Site Completions
2004	12
2005	28
2006 (Jan-Mar)	11*
2006-2007	41
2007-2008	53
2008-2009	50
TOTAL	184

Source: Adapted from Joint Housing Land Availability Study

Note the 2006 figure covers a 3 month period and has been omitted from the calculation

- 5.8 This equates to 37 units per annum being estimated to be developed on small sites. As the first three years of completions have been included in B (completions 1st April 2006 to 1st April 2009) the small sites total will cover the remaining 12-year period which equates to 444 ($37 \times 12 = 444$).

E Conversions

- 5.9 Between 2004 and 2009, there have been a total of 21 conversions completed in the County Borough, which has increased the total housing stock by an average of 5 units per annum over this 5-year period.

Table 14: Number of Conversions 2004 to 2009

YEAR	CONVERSIONS
2004-2005	0
2005-2006	3
2006-2007	0
2007-2008	5
2008-2009	15
Total	23
Average Annual Figure	5

Source: BGCBC Building Regulation Completion Returns

- 5.10 The majority of conversions are of redundant large buildings such as churches, public houses and shops. It is likely that the trend for conversions will continue in

light of policy advice that previously developed land and buildings suitable for conversion or reuse should be used before greenfield sites. Therefore, a 12-year figure of 60 dwellings will be factored into the overall calculation.

F Demolitions

5.11 In order to determine the number of dwellings that will be required in the County Borough, the number of units lost as a result of clearance schemes should be considered. Information from annual returns submitted to the Welsh Assembly Government for the period 2005 to 2009 indicates that a total of 107 properties were demolished as part of clearance schemes on local authority housing estates.

Table 15: Number of Demolitions 2004 to 2009

YEAR	DEMOLITIONS
2005	0
2006	0
2007	3
2008	96
2009	8
Total	107
Average Annual Figure	21

Source: BGCBC Housing Division

5.12 Overall, the average rate of demolition over the period equates to 21 units per annum, although this figure is variable and may be subject to significant fluctuation depending on future housing programmes. Over a 15-year period, this equates to a loss of 315 dwellings.

Housing Land Requirement Calculation

Table 16: Housing Land Requirement Calculation

	Housing Requirement Figure	3,666
B	Completions April 2006 – April 2009	-325
C	Windfall Allowance	-312
D	Small Site Allowance	-444
E	Conversion	-60
F	Demolitions	+315
		2,840
A	Existing Land Supply at 1 st April 2009	-1,707
	Requirement for additional housing sites	1,133

5.13 The Plan allocates 1,625 houses which equates to a total provision of 4,158 dwellings providing over 10% (13%) flexibility for range and choice.

6.0 RESPONSES TO CONSULTATION

PRE-DEPOSIT PARTICIPATION

Issues Paper

- 6.1 The Issues Paper was prepared as a discussion document intended to promote debate on the issues of strategic significance for the authority. The document was placed on the Council's website and sent to Members, key officers, statutory consultees and interested parties. In total, 176 individuals were consulted and 14 responses were received.
- 6.2 In terms of housing the key issues identified for the next 15 years were:
- The need to stem out migration
 - The need to create a more balanced population
 - The unknown impact of international migration patterns
 - The implications of Welsh Housing Quality Standard on Council Stock
 - Ensuring a range of house types are built to meet aspirations and retain residents
 - Tackling problem vacant buildings and making the most of voids in the town centres
 - Improving the unfitness levels in private sector housing
 - Delivering affordable housing solutions.

- 6.3 Consultees were asked a number of questions:-

Question 2.1

Do you agree with the assessment of the population situation? Is it acceptable to use the SE Wales Strategic Planning Group figure (200) as one option for growth? What other options might be put forward?

- 6.4 Five out of six respondents agreed with the assessment but one pointed out that population trends are difficult to predict, and continuation of past trends should not be assumed.
- 6.5 Of the six responses received, two agreed with the growth figure and three disagreed, the other stated that it was a possible option.
- 6.6 Of the three that disagreed two suggested a higher figure of 250. One suggested establishing a moving target and to use upper and lower control limits that lead to triggers if targets are not being met.
- 6.7 In response to this, three different levels of growth were built into the options generated for the Vision and Option workshop.

Question 2.2

If a growth area is proposed, how should future growth be distributed throughout the Plan area? – Should it be based on the UDP Settlement Strategy or are there more sustainable patterns that should be considered?

- 6.8 Three out of seven respondents believed that future growth should be based on the UDP Settlement Strategy, whilst the remaining four preferred an alternative sustainable strategy.
- 6.9 In response to this, three different levels for growth were built into the options generated for the Vision and Option Workshop.

Question 2.3

Are there settlements or areas where future development should be controlled?

- 6.10 It was accepted that some settlements are too small to accommodate growth in a successful and sustainable way. One respondent considered that key towns, such as Blaina, should be the focus for growth.
- 6.11 The options put forward concentrate growth in the main towns but with different spatial distributions.

Question 2.4

Are there settlements or areas where future development should be encouraged and if so, explain where and why?

- 6.12 The majority of responses favoured sustaining existing community areas in line with the current settlement strategy, as all but the smallest will benefit from the provision of new dwellings. Population increase would support local bus services, education and health provision.
- 6.13 The options put forward for discussion include the current settlements strategy as one option.

Question 2.5

In view of the preference for the development of brownfield sites before greenfield sites should the Plan look at identifying all brownfield sites regardless of the location and the needs of the various communities?

- 6.14 Three out of nine respondents agreed that all brownfield sites should be identified but the remaining six disagreed, saying it may be inappropriate. Those who disagreed emphasised that some greenfield sites may be more sustainable and as such they should be used before previously developed land. Also, it was pointed out that some brownfield sites are richer in terms of ecological interests and should not be identified in preference to greenfield sites. On the other hand, one respondent commented that all brownfield sites should be exhausted especially after the loss of heavy industry.

- 6.15 The Candidate Site methodology for identifying new sites deals with all these issues and should result in the most sustainable sites being identified.

Question 2.6

Should the Plan look at increasing housing densities generally or cater for a range of densities according to the location of the site in relation to public transport?

- 6.16 Most of the comments received were in favour of catering for a range of densities, as they considered this would allow for a range of needs and demands.
- 6.17 The Plan identifies specific targets for sites based on 35 dwellings per hectare though it is explained that these are indicative and lower or higher figures will be acceptable depending on the location and specific site constraints.

Question 2.7

How can the Plan cater for the Housing Needs of the aging population?

- 6.18 One respondent advocated incorporating a requirement for 'Lifetime Homes' design standards when building all new housing stock. Two respondents felt it important to ensure that the Older People Strategy is incorporated effectively and the 'need' mapped out.
- 6.19 It is costly to require Lifetime Homes in all new homes, however it should be noted that all public sector funded homes must meet Lifetime Homes Standards and changes to building regulations means that all new homes are suitable for wheel chair users. The older peoples strategy has been incorporated into the Plan, more information on this is included in the Affordable Housing Background Paper.

Question 2.8

How can the Plan assist in the delivery of high quality schemes that are sustainable?

- 6.20 A number of useful comments were received on how this could be achieved, reflecting different interest points. Overall, it was considered possible to achieve this through promoting development in and adjoining the main settlements to ensure that they contribute to creating sustainable patterns of development and make best use of existing facilities, services and infrastructure. Comments received emphasised the importance of delivering high quality designed schemes, and the use of sustainable building techniques including the promotion of energy efficiency measures. Another comment received stated that the density of schemes should be raised to make more efficient use of land.
- 6.21 The Plan has included sites within the main settlements so that they can contribute to creating sustainable patterns of development. National planning policy has now taken over the responsibility of setting sustainable design standards, although the Plan sets higher standards for its two strategic sites.

Issues and Vision Workshop

- 6.22 At the Issues and Vision workshop held in July 2007 attendees were provided with the list of issues identified for the Issues Paper and asked to agree and then prioritise them.
- 6.23 The group chose to merge these issues to create three major issues:
- Improving the quality of our built environment and maximising opportunities
 - Create a more balanced population stemming out-migration
 - Provide a range of housing opportunities to meet aspirations including the need for affordable housing.
- 6.24 The group were then asked to prioritise the most significant issues. The three issues were fairly close but the two with the most votes were:
- Create a more balanced population stemming out-migration
 - Provide a range of housing opportunities to meet aspirations including the need for affordable housing
- 6.25 The third task was to identify the most significant issues for Blaenau Gwent. From this it can be deduced that the two most significant issues were:
- The implications of the decline in the manufacturing sector and the shift in favour of the service sector and technological industries; and
 - To find a role/function for town centres.
- The following two housing issues were close behind:
- Create a more balanced population stemming out-migration; and
 - Provide a range of housing opportunities to meet aspirations including the need for affordable housing.

Preparation of Options for Workshop

- 6.26 As housing was identified as a key issue for the area and the fact that it is a major land user, population and housing modelling work formed a major part of the options scenario's.

The Chelmer Population and Housing Model

- 6.27 The population and housing projection work was undertaken through the use of the Chelmer Population and Housing Model (CPHM) which was originally commissioned by the National House Building Council and developed by Anglia Polytechnic University. Population projections are calculated by taking a base year population together with birth rates, death rates and migration rates to forecast the population over the Plan period. To derive the household requirements, the forecast population is then factored by forecast headship rates (average household size).
- 6.28 Chelmer is a five-year demographic population and housing model. It's database offers a choice of data sources but primarily uses ONS data for each variant. The model also allows "user on-screen editing" in order that different options can be considered. The model automatically resolves conflicting factors.

The Tested Options

6.29 The Council has devised and tested three options, all of which use the latest Mid Year Estimate figures that were released by ONS in August 2007.

Option 1: Continuation of UDP Allocation

6.30 A continuation of the Adopted UDP building rate of 117 per annum has been used for this option. The on screen Chelmer adjustments for this option were to input the building program at a rate of 585 per five year periods.

6.31 This projection predicts that the total population over the Plan period will drop to 67,894.

Option 2: Growth and Regeneration

6.32 This was a dwelling led projection with a higher build rate of 200 per annum. The on screen adjustments for this option were to input 1,000 for each 5-year period. It is a policy based trend projection based on evidence of change over the last five years. This accords with the aims of the Wales Spatial Plan, the Heads of the Valleys Programme and Blaenau Gwent County Borough Council to regenerate Blaenau Gwent with a particular focus on Ebbw Vale. The relatively high figure is also supported by the longer term evidence of house building rates.

This projection predicts the total population over the Plan period will rise to 71,130.

Option 3: Balanced and Interconnected Communities

6.33 This Option is a migration trend-based population projection that uses the five year period 2001-2006 figures to forecast migration figures over the Plan period. This projection used a net migration forecast of 162 for each five-year period.

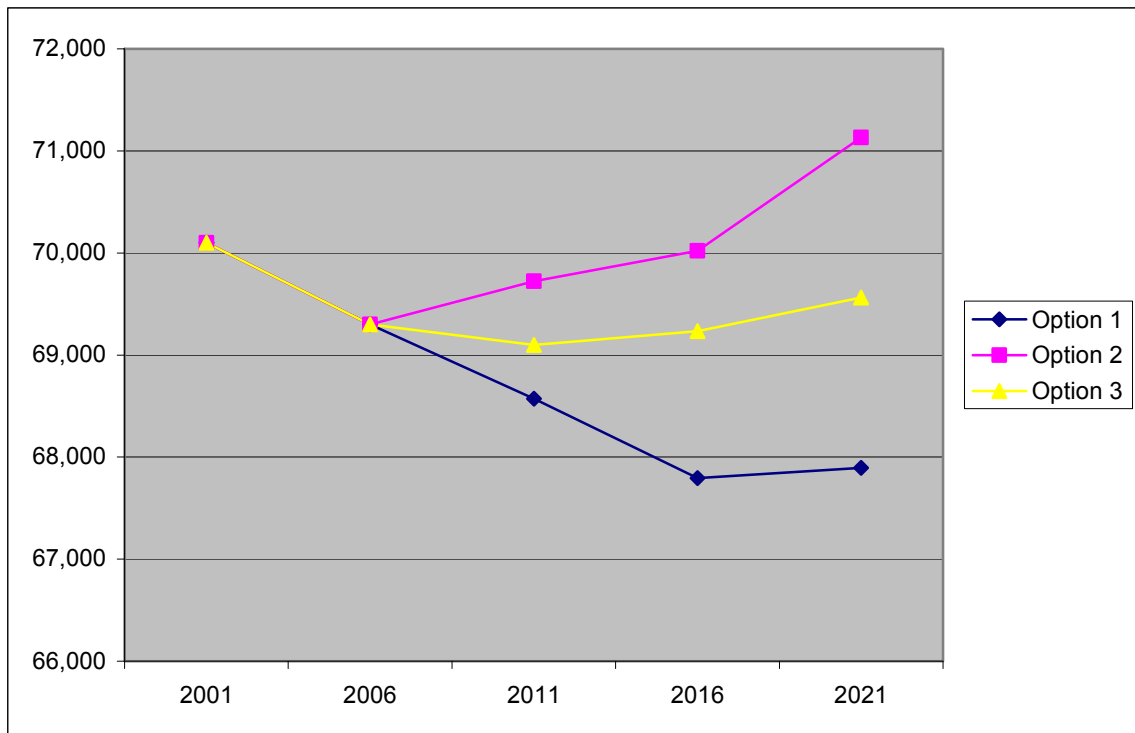
Table 17: Net Migration in Blaenau Gwent 2001-2006

	2001-2002	2002-2003	2003-2004	2004-2005	2005-2006	Total 2001-2006
Net migration	-258	-10	253	-74	251	162

(Source: ONS Mid Year Estimates)

6.34 This projection predicts that the total population over the Plan period will stabilise at 69,563. It results in a dwelling requirement figure of 2,404 that is 160 per annum.

Figure 7: Summary of Tested Options for the Blaenau Gwent Draft Preferred Strategy



Housing Requirement Figure

6.35 In order to identify the spread of growth and the number of new sites required, an assessment of existing sites was undertaken in the various areas of Blaenau Gwent. It was estimated that committed sites, windfall and small sites could contribute approximately 1,840 units.

Table 18 Estimate of Committed sites, small sites and windfall 2007 Spread of Growth

Strategy	Assumed annual build rate	Additional Dwelling Requirement	2021 Population
Option 1 (UDP)	117(1755)	0	68,000
Option 2 (Growth)	200 (3000)	800	71,000
Option 3 (Trend)	156 (2340)	200	69,500

Table 19 Additional Dwellings Required according to Options

Settlement	Share of population	Share of housing	Approx No of committed houses
Upper Sirhowy Valley (Tredegar)	22%	27%	500
Ebbw Fawr (Ebbw Vale)	33%	54%	1000
Upper Ebbw Fach (Brynmawr, Nantyglo and Blaina)	21%	12%	220
Lower Ebbw Fach (Abertillery)	24%	7%	120

- 6.36 The overall requirement figure was distributed in a different way under each of the options. Under option 1 (UDP) there would be no need to identify new sites which would result in an urban containment approach.
- 6.37 Option 2, the Growth Strategy, would require the plan to identify sites for an extra 800 houses and it was determined that these would be located in the Heads of the Valleys corridor centred around Ebbw Vale.
- 6.38 Under the third scenario, which was a trend based projection, there would be a need to identify sites for 200 further houses and these would be located mainly in Ebbw Fach Valley in order to spread the growth more evenly across the Borough.

Vision and Option Workshop

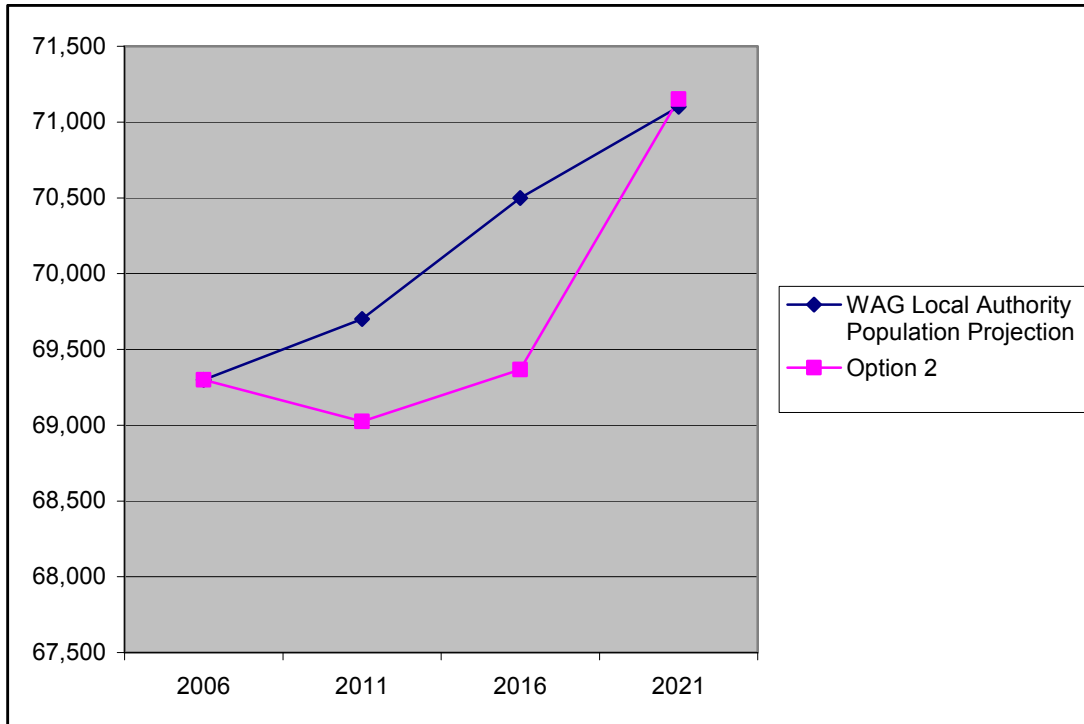
- 6.39 Each of the scenarios were put forward for consideration as part of the Vision and Option workshops (Report on the development of the Options, March 2009). Option 2 was the chosen option. This was modified, however, to take into account the concerns of the house building industry which considered the 200 figure to be too big a step change, and the Housing Market assessment figure of 250. The housing requirement figure was back loaded so that in the first 5 years the build rate will be 150, then during the next five years it will rise to 200 and in the final 5 years it will increase to 250.

The Preferred Option

- 6.40 The Option 2 projection was amended following the findings of the workshop to take into account the back loading of the house-building requirement. A re-run identified that the population will be 71,151 (2021), slightly higher than the earlier projection.

6.41 Figure 7 below illustrates that the Option 2 population projection for 2021 (71,151) is similar to the figure identified for Blaenau Gwent in the recently published Welsh Assembly Government Population Projection for Blaenau Gwent (71,100).

Figure 8: WAG Local Authority Population Projection comparison with Preferred Option



6.42 In response to comments from the Welsh Assembly Government regarding the need for flexibility, the housing requirement figure was amended. The figure included in the Draft Preferred Strategy was increased to 2,250 to 3,000. The lower of these figures is comparable to the figures set out in option 3.

PRE DEPOSIT CONSULTATION

The Draft Preferred Strategy

6.43 The Draft Preferred Strategy was subject to public consultation for a period of six weeks from 7th November until 19th December 2008, during which time a total of 18 exhibitions were also held covering every ward across the County Borough. In total, 58 respondents made 414 representations on the Preferred Strategy, 278 of which were comments/objections and 136 expressions of support.

Objectives

6.44 The Draft Preferred Strategy set out two objectives for housing based on the two priority issues identified at the Options and Vision Workshop.

- 6. Stem out-migration and attract people to the area to create a more balanced population.

7. Provide a range of types and tenures of new homes to meet local housing needs and attract people to the area.

6.45 The following comment was received on these objectives:

Issue – Objectives need to be ‘smart’

Response

6.46 All the objectives have been re-written in an attempt to make them smarter.

Issue - Appropriate quantity and choice of sites

6.47 Objective 7 should reflect the need to ensure that there is an allocation of an appropriate quantity and variety of housing sites to deliver high quality choice in sustainable locations, well served by essential facilities and accessible by a range of good transport modes.

Response

6.48 This is a valid point which has been taken into consideration in the allocation of a range of sites. The objective also reflects that new housing sites will help create sustainable balanced communities.

Level of Population Growth

6.49 The Draft Preferred Strategy identified that between 2,250 and 3,000 dwellings were required in the Plan period. It also identified the areas where the new allocations would be allocated i.e:-

- 1,450 dwellings on sites permitted or under construction;
- 800 dwellings through new site allocations; and
- 750 on small sites (under 10)

6.50 The Strategy identified how the 3,000 houses were to be spread across the Borough.

Table 20: Distribution of Housing Requirement Figure

Area	Share of total 3,000	New allocations
Tredegar Area	800	200
Ebbw Vale Area	1,500	350
Ebbw Fach Upper (Brynmawr, Nantyglo and Blaina)	400	150
Ebbw Fach Lower (Abertillery)	300	100

6.51 Respondents were asked if the level of growth identified 2,250-3,000 was appropriate. Of the 42 respondents, 74% agreed, 14% disagreed and 12% were unsure.

6.52 As can be seen from the percentages people generally agreed with the target figures identified in the Preferred Strategy. There were, however, a number of issues raised:-

Issue – Basis for Growth Level

6.53 One comment considered that the figures require greater scrutiny as 4 years worth of growth was not considered to be sufficient evidence to base a 15-year projection on.

Response

6.54 The projection was actually based on a five year period which the Assembly Government consider to be an appropriate length of time to base projections on. It should be noted that the population figure reflects the Welsh Assembly Government Population Projection figures for Blaenau Gwent. It is, however, accepted that the information presented in the Draft Preferred Strategy Background Paper needs to be updated in light of the Welsh Assembly Government Household Projection for Blaenau Gwent.

Issue – Growth Level

6.55 Another consultee considered that it may be pertinent to pursue the level of growth identified in option 3.

Response

6.56 The housing requirement range identified was actually lower than the figure identified in option 3 (2,404). It should also be noted that another comment suggested that the household requirement figure should be increased.

6.57 Overall there was general support for the level of growth. It is, however, considered appropriate to update the evidence base in light of the Welsh Assembly Government's Household Projection figures and recent completions.

Issue - Spread of Growth

6.58 There was some concern with how growth is spread across the Borough, mostly based around the lack of new housing identified for the Ebbw Fach Valley - in particular the Lower Ebbw Fach. There is a suggestion that there are more brownfield opportunities which could be explored in this area. A further comment was received on adopting the option 3 approach, to spreading growth evenly across the Borough.

Response

6.59 It is certainly not the Council's intention to limit any new brownfield development in the Lower Ebbw Fach area and this will be made clear in the strategic policy for the area (SP2). As for spreading the growth evenly, the strategy has been informed by the Candidate Site process which identified where sites are available. It has also been informed by national and regional policy and guidance which identifies Ebbw Vale as a key settlement and the Heads of the Valleys corridor, in general, as having potential for growth. The concentration on Ebbw Vale also reflects the brownfield availability and potential infrastructure investment in the area over the Plan period.

Issue - Housing Type and Tenure

- 6.60 Two comments were made with regards to the need for a flexible approach when allocating sites to ensure a range of house types and tenures are available. Other comments were received on the lack of mention of sheltered housing, care homes and supported living.

Response

- 6.61 It is accepted that a range of house types and tenures are required. However, in the interests of fairness, openness and transparency the new Local Development Plan system requires the identification of a clear methodology for assessing and allocating sites and the Council must follow its identified methodology. Nevertheless, Policy SP4 of the Deposit Plan encourages a range of house types and tenures.
- 6.62 In terms of sheltered homes, care homes and supported living these issues will be addressed in the Affordable Housing Background Paper.

Issue - Ability to Deliver

- 6.63 The current economic climate and the step change in the building rate were issues raised in terms of the Plans ability to deliver on the 3,000 target.

Response

- 6.64 The current economic climate was the reason for identifying a range in the housing requirement figure. However, it should be noted that housing completions of 300 plus have been achieved in the past and could be attained again given WAG and Blaenau Gwent commitment to funding in 'The Works'.

Issue - Phasing

- 6.65 One comment suggested that the Plan should look at a phased release of land.

Response

- 6.66 In order to provide as much flexibility as possible there is no formal phasing mechanism although the Deliverability chapter in the Plan identifies broad phasing of sites.

Issue - Environmental Capacity

- 6.67 One person considered that Blaenau Gwent did not have the environmental capacity to support such a high level of growth.

Response

- 6.68 In the assessment of sites through the Candidate Site process it is clear that there is sufficient land within the current urban development boundary to cater for the growth identified. The environmental capacity of the area has been considered through the candidate site methodology and Sustainability Appraisal.

Strategic Policy on Housing Provision

SP8 Housing Provision

Provision will be made for the development of between 2,250 and 3,000 dwellings during the plan period; broken into the following Housing Market Areas

Sirhowy Valley	800
Ebbw Fawr	1,500
Ebbw Fach Upper	400
Ebbw Fach Lower	300

Housing sites will include a mix of dwelling types and sizes and tenure to meet the needs of Blaenau Gwent's current and future population.

The Delivery of the houses will be back loaded recognising the step change required to reach the higher figures.

2006-2011	500 -750
2011-2016	750 -1,000
2016-2021	1,000 -1,250

(Objectives 6 & 7)

- 6.69 Twelve comments were made in support and 15 objections were received to this policy.
- 6.70 The comments of support generally welcomed the level of growth in specific areas with 1 generally supporting the overall scale of provision.
- 6.71 In terms of objections there were a number of areas of concern:

Issue - Flexibility / Range

- 6.72 One comment received considered that there should not be a range and that the Council should allocate a figure at the top of the identified range. Whilst another comment sought clarification for the flexibility of the housing range given the current economic climate. Another comment considered the policy to be too complicated and inflexible. Another comment considered there should be a 10% flexibility allowance added. It was noted that the breakdown into the Market areas only reflected the top end of the range.

Response

- 6.73 The range of 2,250 to 3,000 provided the flexibility required to address current economic problems and the uncertainty over achievement of the higher figure. The policy does not intend to be inflexible but aims to address the issue of the current economic uncertainty. Nevertheless, the Deposit Plan has removed the range, on advice from WAG. The Plan includes a flexibility allowance as requested.

Issue - Phasing

- 6.74 Another comment requested that the phasing requirement be removed from the policy.

Response

- 6.75 The phasing requirement recognises the step change that is required to reach the higher completion rate does not limit the number of sites that can be developed.

Issue - Deliverability

- 6.76 One commentator was concerned with the deliverability of the levels proposed. A further 2 comments were received on the need to check the deliverability of the 1,450 committed site.

Response

- 6.77 The issue of the deliverability of the overall figure has been addressed above and discussed earlier in the document when the overall figure was re-assessed against WAG Household Projections for Blaenau Gwent.

- 6.78 In terms of the deliverability of the committed sites, an assessment has been made against TAN 1 requirements in terms of the number of times which outline permissions have been renewed and on knowledge of the planning control team in terms of efforts being made to bring sites forward.

Issue - Density

- 6.79 It was noted that there was no reference to density in the policy and requested that a figure of 30-50 average net density should be allocated.

Response

- 6.80 An average of 35 units has been used in the Deposit Plan although the reasoned justification explains that higher or lower densities will be considered (Policy H1).

Issue - Proximity to Local Facilities and Sustainable Transport

Response

- 6.81 The proximity of sites to local facilities and sustainable transport will be taken into consideration in the allocation of sites. As part of the Candidate Site methodology these issues are assessed at stage 1, stage 2, stage 4 and stage 5 and will play a key role in determining the suitability of sites.

Issue - Inter-relationship between Housing and Employment

Response

- 6.82 At the Draft Preferred strategy stage the Employment figures were based on the WAG Population projection for Blaenau Gwent which indicated negligible growth in the working population. This has been re-assessed by the Employment Background Paper and an allowance has been made for the extra working population.

Issue - Choice of Housing

- 6.83 The need for housing to be accessible, affordable and appropriate for all members of the community, including the elderly and disabled, was considered important by one objector.

Response

- 6.84 It is not considered possible, on viability grounds, to require all houses to be suitable for the elderly and disabled. It is, however, accepted that some of the housing should be built to Lifetime Home Standards. It should be noted that all houses are required to meet building regulations which set standards for accessibility.

Issue - Small Sites

- 6.85 One objector requested that small sites be included in the Plan to allow the construction of specialised properties for organisations such as housing associations.

Response

- 6.86 The sites which are to be identified are dependant on the sites put forward at the Candidate Site stage and the Candidate Site methodology used to identify the most appropriate sites. It must be noted that the Plan is a strategic document and will only identify sites for 10 houses and over. The Deposit Plan does, however include a wide range of sizes of sites.

Issue - Windfall

- 6.87 One objector noted that there was no reference to the contribution that windfall can make to the overall provision.

Response

- 6.88 A contribution for windfall has been made in the calculation of the housing requirement figure in the Deposit Plan.

7.0 DRAFT LOCAL DEVELOPMENT PLAN POLICIES

7.1 Reflecting on comments received at the Pre-Deposit participation, consultation stages and updated projection work, the following objectives and policies were developed:

Objectives

- By 2021, the population will have increased from 69,300 to 71,100 as a result of natural change and other people being attracted to the area. The overall population structure will be generally in line with that of Wales.
- By 2021, 3,666 new houses will have been built approximately 800 of which will be affordable. New housing sites alongside improvements to existing houses will have helped create sustainable communities.

Strategic Policies

SP4 Delivering Quality Housing

1. **To stem out migration and attract people to the area:**
 - a. **Provision will be made for the development of 3,666 new dwellings leading to an increase of population from 69,300 in 2006 to 71,100 in 2021;**
 - b. **Support will be given to proposals to regenerate social housing areas;**
 - c. **Housing renewal projects will be supported; and**
 - d. **Proposals to bring empty properties back into use will be supported.**
2. **To ensure that local housing need is met and sustainable linked communities are created:**
 - a. **A mix of dwelling types, sizes and tenure, including approximately 800 units of affordable and special needs housing will be delivered to meet the needs of Blaenau Gwent's current and future population (327 of which will be delivered through S106 Agreements); and**
 - b. **Provision will be made for 6 pitches for unmet gypsy and traveller accommodation.**

The LDP provides a framework for the development of 3,666 new dwellings in Blaenau Gwent over the Plan period. The construction and distribution of this number of dwellings will assist in halting the process of depopulation and ensure a stable level of growth in the future. According to the WAG 2006 population projections the population is estimated to rise from 69,300 in 2006 to 71,100 in 2021. The WAG household projections identify that 4,082 households will be required to meet this growth. This has been translated to a dwelling requirement of 3,666 due to the need to reduce the vacancy rate from 5.7% to 4% over the Plan period. Statistical analysis and background to the dwelling requirement figure is contained in the Population and Housing Background Paper.

Welsh Assembly Government requirements to bring all Council housing up to the Welsh Housing Quality Standard will lead to the transformation of large areas of housing in Blaenau Gwent. The Council is also supporting private sector housing renewal through the operation of grants and the identification of renewal areas. It is currently undertaking a Renewal Area scheme at Six Bells (Part 1 West). Once this scheme nears completion, the Council will undertake a Neighbourhood Renewal Assessment, in accordance with the provisions of the Local Government and Housing Act 1989, with a view to declaring a new Renewal Area in Blaenau Gwent. In addition, the Council has put in place an Empty Property Strategy to bring back into use long-term empty properties which currently have a negative impact on settlements. All of these actions will contribute to improving the area and thus stemming out migration and attracting people to the area.

Of major importance to the Strategy is the delivery of sustainable linked communities. To create sustainable communities, developments must include a mix of dwelling types, sizes and tenure, including new affordable dwellings. The Local Housing Market Assessment (2006) identifies that 86 units per annum need to be provided which equates to 1,290 over the Plan period. The Affordable Housing Viability Study (2010) identifies that housing sites can deliver 10% affordable units without social housing grant. The Plan is therefore able to deliver 327 new affordable dwellings through S106 agreements over the Plan period. The Council will explore opportunities to maximise the provision of affordable housing in respect of both social rented and low cost housing for sale.

A total of 436 affordable units are already identified in the Plan for delivery through social housing grant and a further 38 have already been delivered. This brings the overall total to 801 affordable units which is over 20% of the total dwellings identified to be provided during the Plan period. The Council in partnership with Registered Social Landlords will seek to provide the remainder of the affordable housing requirement by bringing existing underused stock back into use and through the continued operation of social housing grant. The Council also recognises that securing affordable housing must be carefully balanced against other policy requirements in the Plan.

The Blaenau Gwent Gypsy & Traveller Housing Needs Assessment (June 2007) identifies the need for a further 6 pitches in Blaenau Gwent.

SP5 Spatial Distribution of Housing Sites

- a. In order to create a network of sustainable linked hubs provision for new housing will be located in the following hub areas:

	Approx
Ebbw Vale	1,600 dwellings
Tredegar	900 dwellings
Upper Ebbw Fach	400 dwellings
Lower Ebbw Fach	250 dwellings

- b. An allowance for completions to date, windfall contributions, small sites, conversions and demolitions totalling 826 dwellings is made across the County Borough.

- c. The delivery of the dwellings will be increased in five-year periods recognising the step change required to reach the higher completion figures.

2006-2011	820
2011-2016	1,320
2016-2021	1,526

To provide sufficient land to accommodate the projected growth, the LDP makes provision for the construction of 4,185 dwellings. This represents 519 (14%) units more than the requirement figure of 3,666 to allow for choice and flexibility. Full details of these calculations are provided in the Population and Housing Background Paper.

In order to create a network of sustainable hubs land has been allocated to the four hub areas in accordance with the capacity of the areas. Over 90% of the growth is located in the Heads of the Valleys area with half of the growth being centred within the principal hub of Ebbw Vale. This reflects the importance of Ebbw Vale, environmental capacity issues and the limited number of suitable sites available in the South of the County Borough.

In recognition of the step change required to increase the build rate from current low levels it is considered appropriate to increase the requirement figure over five year periods. This will in no way change the overall requirement for the Plan period but enables the transition from the lower UDP figure to the higher LDP requirement.

Allocations

H1 Housing Allocations

In accordance with Policy SP5 land is allocated for residential development in the following locations:

Policy Number	Site Name	Area (Ha)	Units
Ebbw Vale			
H1.1	Willowtown	0.63	22
MU1	<i>Ebbw Vale Northern Corridor</i>	28	700
		Total	722
Tredegar			
H1.2	Cartref Aneurin Bevan	0.38	13
H1.3	Greenacres	0.50	18
H1.4	Jesmondene Stadium, Cefn Golau	5.26	184
H1.5	Business Resource Centre, Tafarnaubach	1.2	42
H1.6	Land adjacent to Chartist Way	2.89	101
		Total	358
Upper Ebbw Fach			
H1.7	Garnfach School, Nantyglo	0.81	28
H1.8	Crawshay House, Brynmawr	0.71	25
H1.9	Infants School and Old Griffin Yard, Brynmawr	1.04	36
H1.10	Hafod Dawel Site, Nantyglo#	0.74	44
H1.11	West of the Recreation Ground, Nantyglo	0.42	15
H1.12	Land to the East of Blaina Road, Brynmawr	0.72	25
H1.13	Land to the North of Winchestown, Nantyglo	0.43	15
	<i>NMC Factory and Bus Depot</i>		60
		Total	248
Lower Ebbw Fach			
H1.14	Six Bells Colliery Site, Six Bells	1.47	40
H1.15	Warm Turn, Six Bells	0.93	32
H1.16	Roseheyworth Comprehensive, Abertillery	0.95	33
H1.17	Former Mount Pleasant Court, Brynithel#	0.52	18
H1.18	Hillcrest View, Cwmtillery#	0.83	22
H1.19	Quarry Adjacent to Cwm Farm Road, Six Bells	0.64	22
H1.20	Land at Farm Road, Swffryd	3.72	130
		Total	297
TOTAL			1,625

Land identified for 100% affordable housing

UPDATED POPULATION AND HOUSING BACKGROUND PAPER

HC1 Housing Commitments

Policy Number	Site Name	Area (Ha)	Units
Ebbw Vale			
HC1.1	North of Cwmyrdderch Court Flats, Cwm	1.18	16
HC1.2	Letchworth Road	0.93	16
HC1.3	Old 45 Yard, Steelworks Road	3.49	82
HC1.4	Adjacent Pant-y- Fforest	1.63	21
HC1.5	Heol Elan #	1.2	43
HC1.6	Land at College Road#	1.04	41
HC1.7	Adj Sports Ground, Gwaun Helyg#	2.92	69
HC1.8	Higgs Yard	0.99	29
HC1.9	Mountain Road#	0.47	22
HC1.10	Briery Hill#	0.94	33
MU2	'The Works'		520
		Total	892
Tredegar			
HC1.11	Derelict Bus Garage, Woodfield Road#	0.36	11
HC1.12	Former LCR Factory, Charles Street	0.25	14
HC1.13	Former Factory Site, Pochin	0.65	28
HC1.14	Land at Poultry Farm, Queen Victoria Street	0.84	3
HC1.15	Upper Ty Gwyn Farm, Nantybwhch	1.44	38
HC1.16	Former LCR Factory, opposite Tredegar Comprehensive School#	0.62	47
HC1.17	Peacehaven	4.81	147
HC1.18	The Goldmine, Sirhowy	0.17	16
HC1.19	BKF Plastics, Ashvale	1.83	54
HC1.20	Sirhowy Infants School Site#	0.84	23
HC1.21	Corporation Yard	0.75	23
HC1.22	Park Hill	13.09	160
		Total	564
Upper Ebbw Fach			
HC1.23	Recticel and Gwalia Former Factory Site, Brynmawr#	0.96	45
HC1.24	Land at Clydach Street, Brynmawr	0.64	12
HC1.25	TSA Woodcraft, Noble Square Industrial Estate, Brynmawr	0.71	25
HC1.26	Roberto Neckwear, Limestone Road, Nantyglo	0.74	19
HC1.27	Cwm Farm, Blaina	9.01	78
HC1.28	Salem Chapel, Waun Ebbw Road and Pond Road Junction, Nantyglo	0.26	11
		Total	190
Lower Ebbw Fach			
HC1.29	At Cwm Farm Road	0.68	20
HC1.30	Former Swffryd Junior School#	0.41	18
HC1.31	Land at Penrhiw Estate, Brynithel	1.02	23
		Total	61
TOTAL			1,707

Land identified for 100% affordable housing

8.0 DEPOSIT PLAN RESPONSES

Policy SP4 Delivering Quality Housing

Issue - Deliverability of housing sites in light of past build rates (WG) (CCW)

- 8.1 WG support the growth aspiration of the LDP but consider that the deliverability of housing within the plan period should be a matter considered at examination. WG note the good mix of sites and reasonable degree of confidence in delivery with the major funding sources outlined in chapter 9 and with progress of masterplanning of key strategic sites. The key issues requiring further clarification is the ability to deliver the scale of development proposed when compared to past build rates particularly in light of the housing market being less buoyant than some neighbouring authorities. WG are not criticising the positive approach, albeit seeking to ensure that the plan is deliverable in broad terms. WG and CCW note that the proposed build rate has only been achieved 4 times since the 1980's. WG also note the phased delivery and the importance of the planned large strategic sites successfully coming forward.

Response

- 8.2 It is accepted that the housing level is challenging but unless the Council plans to meet these higher levels the area will continue to decline. It should be noted that until 2006 the area had seen very little in the way of completions from RSLs, this picture has now changed and RSL's are now more active in the area. If this trend continues and private sector housing completions reaches former levels then the area should see a marked increase in completions.
- 8.3 Another point to note is that the higher completion figures were achieved when the Council released the former Garden Festival site in the 1980's; the release of 'The Works Site' should have a similar impact on housing completion rates. Large tracts of remediated land at 'The Works' are ready to be released on a phased basis. The other major source of completions is from the Ebbw Vale North site where some parcels are already at pre-application discussion stage.
- 8.4 If the Council does not aim for the higher figure then it will be planning to fail in terms of addressing the declining population and its associated problems. The Plan has had regard to national policy in setting the overall housing requirement, the officers have worked with neighbouring authorities, and the figure is considered to be deliverable.
- 8.5 A Delivery Paper (Jan 2012) has been prepared to identify that sites in the Plan are deliverable.

Issue - Clarity required on relationship between the WG 2006 and WG 2008 based projections (WG)

Response

- 8.6 It is agreed that more clarity is required in the Plan by identifying one figure rather than referring to two separate projection figures. At a meeting with WG it was suggested that a more rounded figure should be identified for ease of reference. Clarity can be provided and a more rounded figure identified if the more up to date

2008 WG projections is used to identify the housing requirement figure. It is suggested to the Planning Inspector that that the housing requirement figure is changed to 3,500, the population figure at 2006 is changed to 68,914 and the population figure at 2021 is amended to 70,894 to accord with the latest WG projection.

- 8.7 The WG 2008 based projection identifies that the number of households at 2021 will be rise to 34,208. This household requirement figure needs to be to be translated to a dwelling requirement figure. The table below sets out the dwelling requirement calculation. The figure of 3,506 has been rounded to 3,500.

Table 21: Calculation of Conversion of Households to Dwellings

Ref	Topic/Factor	Note/Source	*
	Households at 2006	WAG Household Estimates (see relevant tab.)	30,283
	Dwellings at 2006	Calculated using basic Chelmer formula & 2001 census data	32,126
H	Households at 2021	WAG 2008 based proj	34,208
P	Sharing Rate (% of households sharing accomm)	2001 Census (SO490122/SO490001*100)	0.01
S	Sharing Factor (Households per shared dwelling)	2001 Census (SO490122/(SO49a0001-SO490012))	2.00
V	Vacancy Rate	2001 Census (SO48) ((0003+0004)/0001)*100	4.00
D	2021 Implied Dwelling Requirement	Basic Chelmer formula applied namely: D = H [1-p/100(1-1/s)] / (1-v/100)	35,632
	Additional Dwelling Requirement 2006-2021	2021 less 2006	3,506
	Additional Dwelling Requirement 2006-2021 p.a.	Requirement divided by 15 years	234

Housing Land Requirement Calculation

Table 22: Housing Land Requirement Calculation

	Dwelling Requirement Figure	3,500
B	Completions April 2006 – April 2009	-325
C	Windfall Allowance	-312
D	Small Site Allowance	-444
E	Conversion	-60
F	Demolitions	+315
		2,674
A	Existing Land Supply at 1 st April 2009	-1,707
	Requirement for additional housing sites	967

- 8.9 The Plan allocates 1,399 new dwellings thus providing for 3,932 new dwellings which represents a 12% flexibility.
- 8.10 It is recommended to the Planning Inspector that Policy SP4 criterion 1a, objectives 2 and 3, paragraph 5.5, paragraph 6.30 and Policy SP5 criterion c are amended to reflect the figures of 68,914 in 2006, 70894 in 2021 and a housing requirement figure of 3,500.

Issue - Demolition of buildings when sites remain vacant (Mr N Morris)

- 8.11 Questions the need for further housing sites in Brynmawr when permission is yet to be granted on Anacomp UK and Factory Road site. The demolition of other sites in this area should not take place until planning permission has been granted.

Response

- 8.12 The Plan is a 15-year plan which needs to look at long-term requirements for the area not the short term picture. Both sites mentioned by the objector are subject to planning applications. The Factory Road Site has recently (August 2011) been granted permission on appeal and work at this site should commence shortly. The Annacomp UK site is a Brecon Beacons National Park Authority application and is awaiting the signing of a Section 106 legal agreement (Oct 2011).

Issue - Calculation made to translate the housing requirement to a household requirement and in particular the reduction of the vacancy rate to 4% at the end of the plan period (HBF)

- 8.13 Supports the high level of growth but objects to reduction in the household requirement from 4,082 to 3,666 to accommodate a lower vacancy rate.

Response

- 8.14 The problem with vacant properties was an issue raised through consultation on the Preferred Strategy and at exhibitions held on the Deposit Plan. Residents questioned the need for new dwellings given the number of vacant properties in existence. The aim to reduce the vacancy rate to 4%, which is the percentage considered to be an acceptable level to allow movement within the market, is considered to be reasonable and achievable. In the late 1990's Blaenau Gwent was an area of low market demand which had a high level of vacant properties, houses were on the market for long periods of time before they were sold. This all changed in 2003 when property prices started to increase and the number of sales increased. The increase in the cost of houses made vacant properties more cost effective to buy and repair. In addition the Council has high void levels in its Council housing stock, again this will reduce when improvements required to meet the WHQS are completed. Whilst there are a number of difficult vacant properties in the Borough the Empty Property Strategy is working to reduce this number. In light of all this it is considered reasonable to calculate a 4% vacancy rate at the end of the plan period.
- 8.15 The HBF fail to understand that there are already 1,831 empty dwellings (5.7% of 32,126) available to be brought back into use. The Council is aiming to reduce this number to 1,381 (4% of 35,632) by the end of the plan period. The Council suggests that some of these are already being utilised to address the shortfall in

houses built from 2006-2011. If as the HBF suggests the completion rate never reaches the levels anticipated this could arguably result in a lower vacancy rate.

Issue - Housing figure to be a ceiling and Plan should enable development of sites that can be demonstrated to be accessible and sustainable

- 8.16 Supports the high level of Housing but asks that the 3,666 target is not a ceiling and that provided any development is demonstrated to be sustainable, accessible and viable, housing above the target should be accepted.

Response

- 8.17 PPW (Edition 4) makes it clear that LDPs should provide a firm basis for rational and consistent decisions on planning applications and appeals. Section 38(6) of the Planning and Compulsory Purchase Act 2004 requires that, if regard is to be had to the development plan for the purposes of any determination to be made under the Planning Acts, the determination must be made in accordance with the plan unless material considerations indicate otherwise.
- 8.18 The objector is requiring a statement which would undermine the whole basis of the plan led system. The Plan provides sites to meet the housing requirement figure and there is a review process which would enable sites to be added if the figure proved to be too low. The plan also allows for windfall sites to come forward and sets the framework for decisions to be made on such sites. It is considered that the Plan is reasonably flexible to enable it to deal with changing circumstances.

Issue - Allocation of housing sites when the focus should be on providing work for the area (Mr N Morris)

- 8.19 Objects to the allocation of housing sites. The focus should be on ensuring that measures are being taken to provide work in the area. If investment is not made in the future of the people, there will be no people to live in the houses.

Response

- 8.20 The plan addresses both housing and employment needs of the area. Policy SP8 sets out the Council's approach to employment and this is further supported by the Employment Background Paper. The Council has taken into account growth in the working age population and the aim to reduce unemployment in identifying future employment requirements. Whilst this plan recognises the issues and provides land to deal with them, there are other Strategies such as: the Community Plan (Making a Difference – A Community Strategy for Blaenau Gwent (2010-2030); The Health, Social Care and Well-Being Strategy; Community Safety Plan; Children and Young People's Plan; and Regeneration Strategy all working to improve the life of residents of Blaenau Gwent.

Issue - Consultation needed on the potential effects on primary care services (PHW)

- 8.21 In terms of planned residential developments, it is important to liaise with Aneurin Bevan Health Board at an early stage regarding the potential effects on primary care services.

Response

- 8.22 The Council recognise the importance of ensuring that appropriate healthcare facilities are provided throughout Blaenau Gwent. In recognition of this need the

Council has been working with the Health Authority in identifying sites for Primary Care Resource Centres. The Community Facilities Background Paper provides information on the latest position on this. The Aneurin Bevan Local Health Board has played an active part in preparing the Plan through participation at workshops, commenting on the Plan and undertaking a Health Impact Assessment.

- 8.23 In addition, the process of preparing development briefs for the mixed use sites will further allow the Council the opportunity to discuss requirements with the Health Authority.

Policy SP5 Spatial Distribution of Housing Sites

Issue - Phasing of sites in hub areas and how it will be used to control development

- 8.24 Understanding of how phasing will be reflected within the four hub areas as well as how it will be used to manage development over the plan period.

Response

- 8.25 WG requests that there is some explanation of how the phasing set out in chapter 9 impacts on the hub areas. Although Chapter 9 of the Plan indicates phasing for sites the introduction makes it clear that this is only indicative and if the situation alters it is acceptable for the development to come forward early. In view of this it is suggested that it would be misleading to include figures within this section. However it is accepted that an explanation should be included on how phasing is to be used. Information on the phasing in the hub areas is available in the Delivery Paper (2011).

- 8.26 It is suggested to the Inspector that wording is included in paragraph 6.37 to identify how the phasing mechanism is to be used.

Issue - Absence of sites in NE Ebbw Vale

- 8.27 The absence of housing sites with planning permission in the north east of Ebbw Vale and the concentration of housing at Ebbw Vale Northern corridor fails to provide an appropriate range of housing sites to serve the northern part of Ebbw Vale.

Response

- 8.28 A significant (52%) percentage of development is taking place in Ebbw Vale. The sites included in the Plan have been assessed through the Candidate Site Methodology and are the most sustainable and appropriate sites. The objector is proposing sites in this area which were not part of the Candidate Site Assessment Methodology. However, an assessment of the proposed sites revealed that they performed poorly against the sustainability and LDP objectives when compared to other sites included in the Plan.

Issue - Insufficient flexibility

- 8.29 Policy SP5 does not provide sufficient flexibility in view of HBF comments on SP4 to raise the housing requirement to 4,330

Response

- 8.30 In light of the fact the Council disagreed with the proposed increase in the housing requirement figure, in its response to SP4, there is no need to increase the housing supply by 563 dwellings as suggested by the HBF.

Issue - Phasing does not accord with national policy (HBF)

Response

- 8.31 The purpose of the numerical figure in this policy isn't to restrict land being brought forward but to ensure that the land supply figure included in the Housing Land Availability study is gradually increased. Paragraph 6.37 makes it clear that the phasing will not change the overall requirement for the Plan period. The figure will only be used in the Housing Land Availability Study to identify the number of years land supply the authority will need to meet. The phasing of sites included in chapter 9 accords with PPW as it is based on considerations relating to physical or social infrastructure, or to the adequacy of other services. The introduction of chapter 9 makes it clear that this is only indicative and if the situation alters, it is acceptable for the development to come forward early. In response to a comment from WG a sentence is to be included under paragraph 6.37 to confirm this. This should help clarify the issue for the HBF.

Issue - Land supply needs to be examined

- 8.32 The existing land supply needs to be thoroughly examined.

Response

- 8.33 The HBF argue that only 1,100 houses are within the 5 year supply and that 1205 houses are within Category 3(i). The argument is that category 3(i) are sites where "development is unlikely within 5 years by virtue of major physical constraints or other constraints", whilst this may be true of some sites other sites are within this category due to the fact that they cannot be completed within 5 years due to the developers build rate. To address this issue and assist the Inspector a Deliverability Paper has been prepared setting out a 5-year trajectory.

Issue - Level of housing development in Tredegar (Mrs P Davies)

- 8.34 Where there is an identified need for infrastructure to support the proposed developments this will be provided by the developers. In terms of existing need for infrastructure the Plan has identified requirements for, community facilities (see Communities Facilities Background Paper), retail need (see Retailing Background Paper). Whilst a need for a new Primary Care Resource Centre has been identified no decision has been made on which site is to be utilised. It should be noted that the Council is proposing to the Planning Inspector that 2 of the sites in Tredegar should be deleted from the Plan thus reducing the number of houses to be provided in the Tredegar area by 226.
- 8.35 It is acknowledged that there is an issue with school numbers in the Tredegar catchment area. The Education department are currently in the process of preparing a School Organisation Plan which will look to address this issue. The Regeneration division will work with education to identify future school sites.

Issue - Support for additional sites outside those identified (DTZ)

- 8.36 It is essential that the Council, through policy adopted in the Development Plan, are able to support additional sites outside those identified, which have potential to deliver viable housing development.

Response

- 8.37 The suggestion that the housing figure should not be a ceiling to stop any additional sites coming forward where they can be demonstrated as appropriate sites for development goes against the plan led system as set out in section 38(6) of the Planning and Compulsory Purchase Act 2004. The Plan already allows for windfall development, small sites and rural exception sites to come forward any further concessions would undermine the plan led system.

Issue - Distribution of sites centred on Ebbw Vale and Tredegar

- 8.38 Concern regarding the distribution of sites centred in Ebbw Vale and Tredegar as this could have an effect on the network of district hubs, especially Brynmawr, Blaina and Abertillery resulting in migration of people from this area to Ebbw Vale.

Response

- 8.39 The objector is concerned that the focus of sites in Ebbw Vale and Tredegar will damage the regeneration of Abertillery, Brynmawr and Blaina as people will migrate to these areas. It is accepted that Ebbw Vale takes on a greater percentage of growth whilst Tredegar takes a share in line with its population and the other areas have a lower level of growth. This reflected the distribution of sites submitted through the Candidate Site process and the opportunities offered from large brownfield sites. The Strategy is based on building a network of district hubs around the principal hub of Ebbw Vale, whilst recognising there is a north south divide in terms of opportunities for growth. The Strategy was also informed by national and regional policy guidance which identifies Ebbw Vale as a key settlement and the Heads of the Valleys corridor, in general as having the potential for growth.

Policy H1 Housing Allocations

- 8.40 In response to comments made at the deposit stage the Council is suggesting to the Inspector that two sites in Tredegar are deleted from the Plan this results in changes to paragraphs 5.5, 5.13, 6.30, 6.36, 8.28; and Policies SP5 and H1.

9.0 PROPOSED FOCUSSED CHANGES

FOCUSSED CHANGE 1: CHANGES TO HOUSING REQUIREMENT FIGURE, DELETION OF 2 HOUSING SITES AND CHANGES TO HOUSING NUMBERS

FC1.A: Amend Objective 2 to read as follows:

By 2021, the population will have increased from **68,914** to **70,849** as a result of natural change and people being attracted to the area. The overall population structure will be generally in line with that of Wales.

FC1.B: Amend Objective 3 to read as follows:

By 2021, **3,500** new houses will have been built, approximately 1,000 of which will be affordable. New housing sites alongside improvements to existing houses will have helped create sustainable communities.

FC1.C: Amend paragraph 5.5 to read as follows:

A key challenge for the area is to halt the declining population. A major part of this Strategy is to enable the growth in population from **68,914** to **70,849**. To accommodate this growth **3,500** new houses will be required between 2006-2021. A major part of this growth is a result of the increase in one-person households. Over 80% of new housing will be provided in the Northern Strategy Area with **52%** in Ebbw Vale, mainly at two strategic sites which are Ebbw Vale Northern Corridor and 'The Works'. Tredegar will accommodate **22%** and Upper Ebbw Fach **14%** of the housing.

FC1.D: Amend paragraph 5.13 to read as follows:

There is little opportunity to provide housing due to lack of suitable sites, thus only **12%** of new houses are allocated in this area. The Plan concentrates on regenerating the area through encouraging re-use of under-used and derelict properties.

FC1.E: Amend Policy SP4 Delivering Quality Housing criterion 1a to read as follows:

1. To stem out-migration and attract people to the area:
 - a. Provision is made for the development of **3,932** new dwellings **in order to deliver the 3,500 new dwellings required** to increase the population to **70,849 by 2021**;

FC1.F: Amend paragraph 6.30 to read as follows:

The LDP provides a framework for the development of **3,500** new dwellings in Blaenau Gwent over the Plan period. The construction and distribution of this number of dwellings will assist in halting the process of depopulation and ensure a stable level of growth in the future. According to the WAG 2008 population projection the population is estimated to rise from **68,914** in 2006 to **70,849** in 2021. The **corresponding** WAG household projection identifies that **3,925** households will be required to meet this growth in population. **The housing requirement figure** has been translated to a dwelling requirement of **3,500** due to the need to reduce the vacancy rate from 5.7% to 4% over the Plan period. **To provide sufficient land to accommodate the projected growth, the LDP makes provision for the construction of 3,932 dwellings. This represents 432 (12%)**

units more than the requirement figure of 3,500, to allow for choice and flexibility. Full details of these calculations are provided in the Population and Housing Background Paper.

FC1.G. Amend Policy SP5 Spatial Distribution of Housing Sites criteria a and c to read as follows:

a. In order to create a network of sustainable linked hubs provision for new housing will be located in the following hub areas:

Ebbw Vale	1,614 dwellings
Tredegar	696 dwellings
Upper Ebbw Fach	438 dwellings
Lower Ebbw Fach	358 dwellings

b. An allowance for completions to date, windfall contributions, small sites, conversions and demolitions totalling 826 dwellings is made across the County Borough.

c. The delivery of the housing requirement figure will be increased in five-year periods recognising the step change required to reach the higher completion figures.

2006-2011	700
2011-2016	1,300
2016-2021	1,500

FC1.H: Delete paragraph 6.35 (amended version moved to paragraph 6.30)

FC1.I: Amend paragraph 6.36 to read as follows:

In order to create a network of sustainable hubs, land has been allocated in the four hub areas in accordance with the capacity of the areas. Over 80% of the growth is located in the Heads of the Valleys area with **52%** of the growth being centred within the principal hub of Ebbw Vale. This reflects the importance of Ebbw Vale, Brownfield opportunities and the limited number of suitable sites available in the South of the County Borough.

FC1.J: Amend Paragraph 6.37 to read as follows:

In recognition of the step change required to increase the build rate from current low levels it is considered appropriate to increase the requirement figure over five year periods. This will in no way change the overall requirement for the Plan period but enables the transition from the lower UDP figure to the higher LDP requirement. **The figures will be used in the Housing Land Availability Study to identify the 5-year requirement, they are not intended to restrict development. The phased delivery figures and the phasing of sites included in Chapter 9 are only indicative and if the situation alters, it is acceptable for developments to come forward early.**

UPDATED POPULATION AND HOUSING BACKGROUND PAPER

FC1.K: Delete H1.4 Jesomondene Stadium, Cefn Golau from Policy H1 and the proposals map; and amend urban boundary to exclude the site as shown on map 1 attached at appendix 3.

FC1.L: Delete H1.5 Business Resource Centre, Tredegar from Policy H1 and the proposals map and identify the area within EMP2.5 the Employment Protection Area for Tafarnaubach as shown on maps 2 and 3 attached at appendix 3.

FC1.M. Amend figures in Table H1 to read as follows:

Policy Number	Site Name	Area (Ha)	Units
Ebbw Vale			
H1.1	Willowtown	0.63	22
MU1	<i>Ebbw Vale Northern Corridor</i>	28	700
		Total	722
Tredegar			
H1.2	Cartref Aneurin Bevan	0.38	13
H1.3	Greenacres	0.50	18
H1.6	Land adjacent to Chartist Way	2.89	101
		Total	132
Upper Ebbw Fach			
H1.7	Garnfach School, Nantyglo	0.81	28
H1.8	Crawshay House, Brynmawr	0.71	25
H1.9	Infants School and Old Griffin Yard, Brynmawr	1.04	36
H1.10	Hafod Dawel Site, Nantyglo#	0.74	44
H1.11	West of the Recreation Ground, Nantyglo	0.42	15
H1.12	Land to the East of Blaina Road, Brynmawr	0.72	25
H1.13	Land to the North of Winchestown, Nantyglo	0.43	15
	<i>NMC Factory and Bus Depot</i>		60
		Total	248
Lower Ebbw Fach			
H1.14	Six Bells Colliery Site, Six Bells	1.47	40
H1.15	Warm Turn, Six Bells	0.93	32
H1.16	Roseheyworth Comprehensive, Abertillery	0.95	33
H1.17	Former Mount Pleasant Court, Brynithel#	0.52	18
H1.18	Hillcrest View, Cwmtillery#	0.83	22
H1.19	Quarry Adjacent to Cwm Farm Road, Six Bells	0.64	22
H1.20	Land at Farm Road Swffryd	3.72	130
		Total	297
TOTAL			1,399

FC1.N: Amend paragraph 8.28 to read as follows:

In order to stimulate growth in the residential market, the LDP has allocated land for the construction of a further 1,399 dwellings above that which already has planning permission (1,707). The number of units on these sites was identified through the use of an average density of 35 per hectare. These figures are, however, indicative

and higher or lower densities may be acceptable where the proposed development addresses other policy considerations including design and sustainability (Policy DM1). The units have been allocated across a range of sites in order to offer choice and flexibility. This will contribute to the diversification of the housing stock and secure viable sustainable futures for settlements in the north of the County Borough. Settlements in the south of the County Borough will rely more heavily on small sites and windfall development.

For further information please contact:

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