

Mrs V Robinson
Operational Manager for Development Management
The Vale of Glamorgan Council

12 August 2016

Dear Mrs Robinson

RE: Vale of Glamorgan – Housing Provision and Windfall Allowance

Thank you for your letter dated 5 August 2016 which provided a response to my letter dated 2 August 2016.

Firstly, I would like to thank you for clarifying the figures used in the Council's windfall calculations and for making amendments where necessary. I would be grateful if the most up to date and correct figures could be incorporated into the relevant Action Point responses and the Matters Arising Change Schedule, with previous versions superseded. That will ensure that all parties have the opportunity to comment on the correct versions at the time of the Matters Arising Change consultation.

Secondly, having fully considered the Council's response, I wish to reiterate the concerns previously set out in my letter of 2 August 2016, particularly those relating to the use of the 'residual method'. Specifically, using the most up to date and correct figures, I agree with the Council that an assumption of 70 dwellings per annum would be consistent with long term trend data since 2001. However, if it is this evidence that the Council wishes to use as the basis for the calculation, then the 70 units should be applied as a flat rate for the remaining years of the Plan.

Putting aside trends since the start of the plan period (2011), a flat rate is the only way of ensuring that the assumed rate of delivery for the remaining years of the plan is consistent with that of the longer term trends since 2001. As I am sure you are aware, utilising the most recent residual figure of 91 dwellings per annum would be some 21 dwellings per annum above the average rate of growth over the 15 year period between 2001/02 to 2014/15. As I have previously stated, the latter years of the plan should not be used to compensate for the lower delivery rates during the first 5 years of the plan (2011/12 to

2015/16) where the average annual rate was only 28 dwellings¹ which is in itself significantly below the 70 dwelling annual allowance, yet alone the 91 dwellings that the Council currently propose to use.

According to my calculations the shortfall, based on a reduction from 91 units to 70 units, would equate to some 210 dwellings over the remaining years of the plan.

Bearing in mind the fact that a flexibility margin resembling approximately 10% of the housing requirement figure should be retained and not, therefore, used to make up the identified shortfall, I would be grateful of some clarification from the Council as to how it would like to progress, including how the proposed approach would impact on the examination timetable.

I trust this is of assistance to you.

Yours sincerely,

Richard Jenkins

INSPECTOR

¹ Table 1 of Council's letter dated 5 August 2016 – $140 / 5 = 28$ dwelling per annum average