

**Date/Dyddiad** 20th May 2016  
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Mr Richard Jenkins BA (Hons) MSc MRTPI  
C/O Programme Officer

Dear Mr Jenkins,

**Re: Vale of Glamorgan LDP – Hearing Sessions 2 & 3, Action Point 5**

The Council has prepared a statement to address the above action point (enclosed) and we consider that the approach in respect of the 10% 'flexibility allowance' for housing supply represents a rational, logical and sensible approach to housing supply and flexibility for the remainder of the Plan Period in view of the specific context of the Vale of Glamorgan LDP.

We have discussed this proposed response with officials from the Welsh Government Planning Division and whilst they support our amended approach to windfall assumptions, they do not agree with our approach to the 10% flexibility on the housing requirement figure. As our statement outlines, we believe the 10% flexibility should only be applied to the residual housing requirement (having taken off those dwellings already completed or under construction).

Welsh Government officials have raised concerns that no adopted plan in Wales has applied the flexibility allowance to a partial plan period. They consider it should apply to the plan period as a whole, i.e. the whole housing requirement figure. They note that our proposal is a different approach to our previous position where we applied flexibility to the whole requirement. The Welsh Government considers the Council should seriously consider applying the 10% to the whole plan period. A lack of identifying adequate land to provide for 10% flexibility on the whole housing requirement (rather than the residual housing requirement) would cause concern to the Welsh Government, raising an objection through the statutory process. They advise it is highly unlikely that this approach would be found appropriate, raising significant concerns regarding the soundness of the plan.

Notwithstanding Welsh Government's informal comments, we feel that our approach set out in our statement is the correct approach for all the reasons clearly explained in our statement. However, if you share their concerns about this approach we would have to reconsider our response to this action point to your satisfaction.

I would be grateful to receive your reply at your earliest convenience so that we may submit our formal response to this action point as soon as possible.

Yours sincerely,

**Mrs Victoria Robinson**  
**Operational Manager for Development Management**