

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

2 August 2016

Dear Mrs Robinson

RE: Vale of Glamorgan LDP Examination

WITHOUT PREJUDICE - Housing Provision & Windfall Allowances

Concerns were raised at Hearing Sessions 2 and 3 in relation to the proposed windfall allowance that had informed the plan's housing figures. The Council has since provided a response to those concerns in the form of the following Action Point Responses:

- Action Points 4, 6, 7, 8, 9 and 10 of Hearing Sessions 2 and 3; and
- Action Point 5 of Hearing Sessions 2 and 3

I write in relation to these responses, with particular concern for the approach advocated in relation to the large site windfall allowance.

Firstly, I am concerned with the methodology that has resulted in the large windfall allowance for the period between 2019/20 and 2025/26 (i.e. the annual allowance of 116 dwellings)¹. Specifically, I am not satisfied that the '*residual method*' is an appropriate way of calculating windfall allowances². If the annual average of 77 units has not been delivered to date, then it would not be appropriate to assume that this would be 'made up' during the latter part of the plan, not least because the Council has no control over whether or not windfall sites will come forward. As such I see no justification, based on the evidence available, to go above the annual average of 77 units that stems from the Council's own evidence.

Indeed, Figure 1 at paragraph 2.10 of the amended housing land supply trajectory makes it clear that the 116 figure is extremely optimistic relative to the corresponding delivery rates for the early years of the plan. Notwithstanding

¹ Refer Council's Response to Action Point 6 of Hearing Session 2 and 3, including updated Housing Land Supply Trajectory.

² Refer paragraphs 2 and 3 of Action Point 6 of Hearing Sessions 2 and 3.

this, the proposed 116 figure is higher than the annual average of 106 units that was assumed for large windfall sites in the submitted version of the plan (which in itself resulted in the aforementioned Action Points)³. On this basis, I am concerned that the use of the 'residual method' could serve to artificially inflate housing supply by increasing the annual allowance from 77 units to 116 units. According to my calculations, this difference would amount to some 273 dwellings between the years 2019/20 and 2025/26.

Secondly, I would appreciate some clarification in relation to the evidence that has informed the calculation of the 77 unit annual average for large sites. Specifically, whilst paragraph 3 of the Council's response to Action Point 5 puts forward a convincing case for the use of the 77 unit annual average, the figures that have informed this appear to be unclear. Specifically, the figures outlined in Table 1 of Appendix 1 of the Council's response to Action Point 5 appear to differ to the following evidence:

- The large site windfall figures outlined in Table 4 of the Council's Statement for Hearing Sessions 2 and 3.
- The large site windfall figures within the trajectory illustrated at Figure 1 (paragraph 2.10) of the amended housing land supply trajectory (Response to Action Points 4, 6,7,8,9 and 10 of Hearings 2 and 3).
- The large windfall site figures at Table 1 (paragraph 12) of the Council response to Action Point 5.

Further to the concerns above, I would be grateful if the Council could explain the reason for the differentiation between "Large Sites Supply April 2011" and "Large Windfall (10+ dwellings)" in the housing land supply trajectory outlined at Figure 1 of the response to Action Points 4, 6, 7 ,8, 9 and 10 of Hearing Session 2 and 3.

Such matters clearly go to soundness and need to be addressed before the plan is progressed. Should the MAC consultation progress without such matters being addressed, an additional hearing session will clearly be necessary with potential for the requirement of further MACs (and associated preparatory processes).

I trust this is of assistance.

Yours sincerely,

Richard Jenkins

INSPECTOR

³ Refer Table 4 on page 18 of the Council's Statement associated with Hearing Sessions 2 and 3.