

**Matter 3: Housing Provision – Distribution and Amount**

**Key Issue: Is the amount of housing provision set out in the LDP realistic and appropriate and is it founded on a robust and credible evidence base? Will it achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?**

**Key Issue: Is the distribution of housing as proposed in the LDP realistic and appropriate and is it founded on a robust and credible evidence base?**

**Key Issue: Do the overall scale, type and location of the allocated housing sites achieve the relevant objectives of the LDP in a sustainable manner consistent with national policy?**

**Amount**

- How does the amount of housing proposed relate to the most recent Welsh Government household projections?
- What is the methodology for translating the number of jobs into the number of homes required?
- Are reasonable assumptions made in the growth model, for example with regard to economic activity rates and household size? What are the implications if they are not realistic?
- What is meant by the terms 'vacancy rate' and 'flexibility allowance'? Will these be reasonable and appropriate?
- What percentage of the units identified for each 5 year period in the Housing trajectory will be built on previously developed land?
- How were the numbers of units on each site defined. What is the average density for sites in the Coastal Corridor Strategy Area and the Valley Strategy Area?
- What evidence is there as to when dwellings/sites will be completed? Will there be a 5 year supply of housing land throughout the plan period?
- Are all the landbank sites identified in Policy H 1 in the 5 year supply? If not which sites are omitted; when and how will they be brought forward? What assurance can be provided that landbank sites will be delivered during the plan period?
- Policy SP7 makes provision for the delivery of windfall and small sites at a rate of 55 and 54 units pa respectively. What rate of delivery has been achieved since the beginning of the plan period? Taking account of past trends are windfall and small sites allowances realistic?

**Distribution**

- Where a balance has been struck in taking decisions between competing alternatives is it clear how those decisions have been taken?
- What criteria were used to select allocated sites? Is it clearly set out how various alternatives measured up to the selection criteria?

- What contingencies are there with regard to achieving the intended distribution of housing development if sites fail to come forward or to provide the anticipated number of units?
- Should there be a policy to encourage self-build housing schemes?
- Are there sufficient housing allocations in the Valley Strategy Area?

**Key Issue: Are the policies for Open Space clear, reasonable and appropriate?**

- Why is greenspace<sup>1</sup> not covered by the LDP Open Space Assessment? In this respect is the LDP consistent with PPW and TAN 16: *Sport, Recreation and Open Space*?<sup>2</sup> Should Policy OS 1 be amended to include reference to the accessible greenspace standards?
- How has the threshold of 3 or more dwellings identified in Policy OS1 been defined? What projected level of new open space provision will be generated by the policy? Where will it be located?
- Does Policy OS 2 refer only to the types of open space described in LDP paragraph 5.1.53? If so, how will areas of greenspace be protected? Are Policy OS 2 and paragraph 5.1.61 sufficiently clear on this matter?

SEW/NG  
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<sup>1</sup> EB13 page 1, footnote 1

<sup>2</sup> TAN16 paragraphs 2.5 & 3.1-3.5