

# LLANDAFF SOCIETY LDP EXAMINATION SUBMISSION 20/12/14

## SESSION 3: Housing Provision

### 1. PART OF THE PLAN THAT IS UNSOUND

1.1 Llandaff Society criticised the **scale of housing in the Deposit Plan (DLDP)** for its fixation with projections of demand. As the economic position of the UK and the world has become clearer over the past year, it is now certain that the projections are completely divorced from economic reality.

1.2 **No specific phasing policy has been included in the DLDP**, only a general reference to “phasing”, the meaning of which may be open to misinterpretation. We are concerned that this will mean that the timing of delivery of housing will depend on a race between developers to open up sites something which has started already - plus a drive to reduce build costs to a minimum, and make their housing as attractive as possible to the market. The recent reduction in sustainability standards for new homes by Welsh Government will help developers, but lead to higher heating costs for home owners.

1.3 The build rates supplied as housing trajectories do not inspire great confidence as after 1 or 2 years to build up they are generally straight divisions of site capacity. There is still uncertainty about the availability of mortgages and personal finance which makes forecasting difficult, despite the expected pent-up demand. We thus remain concerned that the **only flexibility built into the DLDP is upwards**, towards release of more land for housing, with no account taken of how new communities might be built in a modular way so that each phase is reasonably self-sufficient.

### 2. WHICH SOUNDNESS TESTS DOES IT FAIL?

2.1 The DLDP fails tests CE1-4 Coherence and Effectiveness; and P2 Sustainability.

### 3. WHY DOES IT FAIL?

3.1 There are now only 12 years left of the Plan period. It is beyond credibility that, taking account of lead-in time, build rates, and market conditions, house builders could achieve 20,000 completions by 2026. These kind of sales would be difficult for family housing to achieve even in buoyant economic conditions, and these are very unlikely to return any time soon according to the Office for Budget Responsibility.

3.2 There are very real risks in over-allocating sites, particularly large ones which require a higher level of infrastructure of all kinds, because if - as we contend is certain - many of the houses are not completed by 2026, sites will remain unfinished, residents will be stranded with low frequency bus services, no new employment, schools, community facilities or open space.

3.3 The sensible approach - particularly when the Planning Bill proposes a Strategic Development Plan for the Region - is to adopt an LDP plan with a lower but achievable level of housing accompanied by strategic infrastructure which can be extended as required (as suggested in our response to the Preferred Strategy).

3.4 The fact that the Plan is failing is illustrated by the fact that landowners and developers are already seeking to pre-empt the provisions of the Plan by submitting premature applications in the hope of obtaining permission free of CIL obligations.

#### **4. HOW CAN THE PLAN BE MADE SOUND?**

4.1 By inserting wording requiring robust phasing into the housing policies in a way that can be relied on to provide a sound basis for decision-making and will withstand being tested on appeal.

#### **5. WHAT IS THE PRECISE WORDING BEING SOUGHT?**

5.1 The following words need to be added:

**KP2 STRATEGIC SITES** .....*will be phased to ensure that Metro fixed track services between North West Cardiff, Cardiff Central Station and Cardiff Bay are in place and operational before occupation of any houses and other buildings for public use.*