

P-04-786 Save our Countryside – Revise TAN 1 –

Correspondence from Petitioner to Committee, 04.04.18

Once again thank you for dealing with this very sensitive issue, I thank the committee for listening to my views regarding Tan1 and the difficulties it is causing and allowing for speculative applications in areas outside our Local Development Plans. I would ask that this issue be discussed in plenary (if possible) where every Assembly Member could have the opportunity to discuss this issue.

Once again my thanks to you for discussing this.

Regards

Mike Priestley

Correspondence from Petitioner to Committee, 08.04.18

It is acknowledged that the Arcadis research identified issues with viability as being the cause of delays in a number of sites. However as they were commissioned to look specifically at viability in the planning process, it is inevitable that other problems may not have been considered.

It is agreed that the TAN1 JHLAS methodology is not a cause of delays in housing delivery, rather that the residual methodology fails to recognise the effects of the recession, the slowdown in the housing market and reductions in population and household projections. The residual method means that local authorities are still having to chase housing targets that became outdated some 4 years ago. This is the problem which is causing ongoing housing supply shortfalls.

Local authorities can address this issue, however it is not as simple a process as the Minister appears to suggest; LPAs cannot revise housing requirements as part of the LDP annual monitoring reports. This can only come through a review of the LDP which will take a number of years to complete. Conwy have started the review process this process, but until it is complete and the replacement LDP has been adopted, we and many other Welsh authorities are producing JHLAS reports which include absurd and unachievable annual housing requirements. In the mean time, we will continue to have a significant housing land supply shortfall, with our communities risking an increasing number of greenfield, unallocated sites being granted permission on appeal.

Using the residual method of calculation can indicate *'land shortages or surpluses, which do not exist in practice. In such cases, a comparison of available land with*

past build rates can provide a measure of the adequacy of land supply that is more relevant to the achievement of the general objectives of the development plan.' This was recognised in the 2006 edition of TAN1, however the current edition fails to acknowledge, let alone address the shortcomings of the residual method.

The proposed alternative calculation, which would use an LDP's annual requirement as the basis for assessing a 5-year housing land requirement would allow LPAs to aim for a realistic level of housebuilding. This would avoid the present situation where the problem is exacerbated by the backlog of housing under-delivery due to the recession, which in many cases took place prior to LDP adoption but was ignored in the WG household projections included in LDPs.

Despite numerous requests from Conwy and other authorities, WG are continuing to avoid directly addressing the problems mentioned here, citing the need to inflexibly use the residual method based on LDP housing requirements, without acknowledging the unachievable annual requirements that result. We urge the Assembly to consider the issues raised here and to listen to the views of local authorities and their communities, who understand first-hand the consequences of WG continuing to ignore the underlying cause of the problems in housing land supply across Wales.