



Appendix10
Joint Housing
Land
Availability
Study 2014

WREXHAM COUNTY BOROUGH COUNCIL JOINT HOUSING LAND AVAILABILITY STUDY 2014

**BETWEEN WREXHAM COUNTY BOROUGH COUNCIL
AND THE STUDY GROUP:**

**HOME BUILDERS FEDERATION
TAI CLWYD
PENNAF
WALES AND WEST HOUSING ASSOCIATION
NRW
DŴR CYMRU/WELSH WATER**

31st January 2015

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1.0 SUMMARY

1.1 This is the Wrexham County Borough Council Joint Housing Land Availability (JHLAS) Study for 2014 which presents the housing land supply for the area at the base date of 1st April 2014. It replaces the report for the previous base date of 2013.

1.2 The JHLAS has been prepared in accordance with the requirements of *Planning Policy Wales* (Edition 5, November 2012), *Technical Advice Note 1 (TAN 1)* and the Guidance Note on the JHLAS process (Version 2 September 2012). Please refer to these documents for details of the requirements for the maintenance of a five year housing land supply in each Local Planning Authority area and the process for undertaking JHLASs. These documents can be accessed on the Welsh Government web site using the following link:

<http://wales.gov.uk/topics/planning/planningstats/housing-land-availability-in-wales/?lang=en>

1.3 Section 2 sets out details of the housing land supply and how it has been calculated. It shows that based on the past completions method set out in TAN 1, Wrexham County Borough Council has a housing land supply of **3.1 years**.

Involvement

1.4 The housing land supply has been assessed in consultation with:

- Home Builders Federation
- Pennaf
- Housing Department (WCBC)
- Tai Clwyd
- Wales & West Housing Association
- Natural Resources Wales
- Dwr Cymru / Welsh Water

Report production

1.5 Wrexham County Borough Council issued draft site schedules and site proformas for consultation between 26th June and 18th July 2014. Comments were provided by the HBF and other parties within this period. A Statement of Common Ground (SoCG) was subsequently prepared by the Council and, following consultation with the Study Group, was submitted to the Welsh Government on 29th August 2014.

1.6 It was necessary for an Appointed Inspector to resolve a number of disputed matters because details with the site schedules could not be agreed by all parties through the SoCG stage.

1.7 The appointed Planning Inspector subsequently prepared a report for the Welsh Government (Appendix 4), including recommendations on the points of

dispute. The Planning Inspector's recommendations were considered by the Welsh Government and this information has been incorporated into this report. The Inspector recommended a land supply based on past build rates of **3.1 years.**

2.0 HOUSING LAND SUPPLY

- 2.1 The five year land supply comprises sites with planning permission (outline or full) and sites allocated for housing in adopted development plans, categorised as prescribed in TAN 1.
- 2.2 The land supply has been calculated using the past building rates methodology because as at 1 April 2014 there was no up-to-date adopted development plan covering the Wrexham County Borough Council area.

Table 1 – Identified Housing Land Supply
(A full list of sites can be found in Appendix 1)

Housing Land Supply 1st April 2014 – 2019 (Large Sites)								
	Proposed homes	5 Year Land Supply (TAN 1 categories)				Beyond 5 Years		Homes completed since last study
		Under construction	1	2	2*	3 (i)	3 (ii)	
Total	1911	120	89	690	0	546	54	151

- 2.3 Five year large site land supply break-down (i.e. Categories 1, 2, 2*, and Under Construction):

Private	799
Public	38
Housing Association	62
Total	899

2.4 Small Site Supply

The contribution from small sites of less than 10 dwellings is based upon the completions for the last five years. **The five year supply of small sites is 405 units.**

Table 2 – Small Site Completions for previous 5 years

Small Site Completions					
2009-2010	2010-2011	2011-2012	2012-2013	2013-2014	Total
105	95	77	64	64	405

- 2.5 Overall total **5 year land supply** (large + small sites) is **1304units** (899 + 405).

Table 3 – 5 Year Land Supply Calculation (Past Completions Method)

A	Total Previous 10 Year Completions (2004 – 2014)	4258
B	Average Annual Completions = (A / 10)	426
C	Total 5 Year Land Supply	1304
D	Land Supply in Years = (C / B) rounded to one decimal place	3.1 years

3.0 COMMENTARY

- 3.1 TAN 1 advises that to meet the requirement for a 5-year land supply the quantity of land agreed to be genuinely available may be compared with the remaining housing provision in the adopted development plan – the residual method. However, in this case, the Wrexham adopted Unitary Development Plan (UDP) expired in 2011. Whilst the UDP retains development plan status, the 2014 JHLAS period is wholly outside the UDP period.
- 3.2 The Inspector considered past building rates to be the most appropriate method of calculating the land supply, given that the UDP period does not cover any part of the 2014 JHLAS period.

Council's Statement

- 3.3 WCBC acknowledges that the land supply, as based upon past build rates, is below the necessary 5 years and is aware of the requirement in such cases to take appropriate steps to increase the land supply as set out in TAN1. However, in calculating the 5 year land supply, WCBC maintain that past completion rates should remain as 5 years and not 10 years as set out in the 2012 guidance. As such this would result in a land supply of 4.54 years not 3.1 years and would be more reflective of market conditions. This will also allow for a direct comparison with earlier JHLASs. Furthermore, during the last 10 years, particularly between the periods 2006-2007 and 2007-2008, there were exceptionally high levels of housing completions where 948 units and 606 units were built respectively. As this was during a boom period in the economy it distorts the average number of completions, particularly when it is highly unlikely that such a level of development will occur over the next few years. The Council considers that the average completions over the past 5 years represent a more accurate picture of building trends.

- 3.4 It must also be noted that 841 units remain undeveloped on allocated sites for 10 or more units within the UDP where only 98 units do not currently have valid permission (Bridge Street ref16 and Crescent Road ref18). Those with permission which have been identified by applicants and developers as not contributing to the 5 year supply (600 units) have mostly been attributed to poor market conditions. In addition during 2014, 84 units (on sites containing 10 or more units) have been granted subject to the finalisation of S106 agreements.
- 3.5 Given that WCBC is currently preparing its LDP, it does not consider it necessary at this stage to implement formal steps to increase the land supply. In any case a lack of resources would not allow for this and would ultimately delay the LDP process. Furthermore, given that applicants and agents have indicated that the poor economic climate has had an impact upon the number of units built and the number expected to be built over the next 5 years, it is hoped that this situation will improve and hence increase the overall supply. The Council will give appropriate consideration to any applications that may be submitted for residential development outside of existing settlements. It must be stressed, however, that the Council cannot guarantee that any such applications will be approved simply because they contribute to the land supply. The need to increase the 5 year supply will not override the need to take account of all other planning constraints and material considerations. Any applications will be carefully considered on their own individual merits together with the potential contribution that such development can make to the overall housing land supply.
- 3.6 Although, the land supply has decreased again from the 2013 baseline of 3.4 years to 3.1 years, this is mostly reflective of the alternative method of calculating the supply which was introduced by WG in September 2012 including the requirement to ensure the small site contribution is based upon average completions over the last 5 years rather than on anticipated completions. It is also partly due to the knock on effects of the economic recession which resulted in the number of applications for development over the past few years significantly drop. As the market has started to pick up, the number of applications for development has increased and the Council is hopeful that the housing land supply will improve over the next 24 months subject to market conditions and no further changes to the method of calculating the 5 year supply.

4.0 MONITORING DATA

- 4.1 TAN 1 requires the JHLAS report to provide additional information on the development of land for housing covering the use of previously developed land, the use of sites subject to flood risk constraints and the type of housing being developed, i.e. houses, flats or other. This data is set out below.

Table 4 – Re-use of Previously Developed Land (Large Sites)

Total Number and Percentage of Homes by Category and Land Type												
Year	5 Year Supply				3i and 3 ii Categories				Completions			
	Greenfield		Brownfield		Greenfield		Brownfield		Greenfield		Brownfield	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
2011	298	22	1051	78	468	43	623	57	56	27	154	73
2012	396	37	676	63	340	39	536	61	38	11	318	89
2013	404	38	649	62	265	38	694	62	48	27	127	73
2014	375	42	524	58	207	35	393	65	22	15	129	85

Table 5 - Sites subject to flood risk constraints (Large Sites)

Total Number and Percentage of Homes by flood risk category ¹												
Year	5 Year Supply				3i and 3 ii Categories				Completions			
	C1		C2		C1		C2		C1		C2	
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
2011	0	0	32	2	0	0	61	5	0	0	61	5
2012	0	0	99	9	0	0	50	6	0	0	0	0
2013	0	0	95	9	0	0	35	5	0	0	4	7
2014	0	0	42	5	0	0	0	0	0	0	10	19

Table 6 - Completions by House Type – 1 April 2013 to 31 March 2014 (Large Sites)

- **119 (79%)** houses completed
- **29 (19%)** apartments/flats completed
- **3 (2%)** bungalows

¹ Categories defined in TAN 15:

- C1: Areas of floodplain which are developed and served by significant infrastructure, including flood defences.
- C2: Areas of floodplain without significant flood defence infrastructure.

Appendix 1 – Site Schedules

Residential Land Availability Schedule – Sites for 10 or more as at 01-04-2014

Abbreviations: PR – Private, RSL – Registered Social Landlord, Prev Comp – Previously Complete, UC – Under Construction, Comp – Complete, NS – Not Started

Broughton

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Broughton	2010/0257	0.59	Public	Land at Colliery Road, Southsea, Wrexham	17	0	0	17	0	0	0	0	0	0	0	0	17
Broughton	2012/0523	14.75	PR	Gatewen Colliery, Gatewen Rd, New Broughton	231	73	33	111	14	30	30	30	21	0	0	0	0
Grand Total					248	73	33	128	14	30	30	30	21	0	0	0	17

Brymbo

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Brymbo	2007/0395 & 2007/0424	0.89	PR	Land off Queens Road	24	0	0	19	5	3	8	8	0	0	0	0	0
Brymbo	2009/0485	20.6	PR	Brymbo Steelworks Site	525	503	22	0	0	0	0	0	0	0	0	0	0
Brymbo	2010/0733	0.50	PR	Land off Blast Road	17	0	0	17	0	0	7	10	0	0	0	0	0
Brymbo	2013/0586	0.389	PR	Land north of Clifton Avenue, Brymbo, LL11 5FS	10	0	0	4	6	4	0	0	0	0	0	0	0
Grand Total					576	503	22	40	11	7	15	18	0	0	0	0	0

Caia Park

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Caia Park	2006/0131	0.36	PR	Rivulet Rd (adj to N Wales Motorcycles)	24	0	0	12	12	0	0	0	0	0	0	12	0
Caia Park	2009/0536	0.14	PR	The tie Centre, Whitegate Rd, LL13 8RB	10	0	0	10	0	0	0	0	0	0	0	0	10
Caia Park	2010/0221	0.32	Public	Land at Gwenfro, Wrexham	14	0	0	14	0	0	0	0	0	0	0	14	0
Caia Park	2010/0244	0.32	Public	Whitegate Road	12	0	0	12	0	0	12	0	0	0	0	0	0
Caia Park	2011/0675	1.89	RSL	Former Gas Works Rivulet Road	35	0	35	0	0	0	0	0	0	0	0	0	0
Caia Park	2012/0880	0.18	RSL	Former Gas Works Site Rivulet Road, Wrexham, LL13 8DT	20	0	0	0	20	0	0	0	0	0	0	0	0
Caia Park	2013/0840	0.67	RSL	Land between Coed Aben and Glan Gors, Wrexham	23	0	0	23	0	23	0	0	0	0	0	0	0
Caia Park	UDP 18	0.54	PR	Former Depot, Crescent Rd	13	0	0	13	0	0	0	0	0	0	0	0	13
Grand Total					151	0	35	84	32	23	12	0	0	0	0	26	23

Cefn/Acrefair

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Cefn	2007/0634	1.01	PR	Land at Cae Ann Dolydd, Cefn	20	1	0	14	5	0	0	0	0	0	0	14	0
Cefn	2010/0226	0.47	Public	Land at Whalleys Way, Cefn Mawr, Wrexham	14	0	0	14	0	0	14	0	0	0	0	0	0
Cefn	2010/0236	0.33	Public	Land at Bro Gwilym, Cefn Mawr, Wrexham	12	0	0	12	0	0	12	0	0	0	0	0	0
Cefn	2012/0045	8.329	PR	Former Air Products Site, Llangollen Road, Acrefair, Wrexham	230	0	0	230	0	0	0	0	30	30	0	170	0
Grand Total					276	1	0	270	5	0	26	0	30	30	0	184	0

Chirk

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Chirk	1462	3.44	PR	Land off Sycamore Drive, Chirk LL14 5BG	85	0	0	85	0	0	0	0	0	0	0	85	0
Chirk	2008/0843	0.36	PR	Land adj. Beverley, Chirk Green, Lloyds Lane	11	6	5	0	0	0	0	0	0	0	0	0	0
Grand Total					96	6	5	85	0	0	0	0	0	0	0	85	0

Coedpoeth

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Coedpoeth	2009/0794	0.37	PR	Community Centre Fron Las Coedpoeth	23	20	3	0	0	0	0	0	0	0	0	0	0
Grand Total					23	20	3	0	0	0	0	0	0	0	0	0	0

Esclusham

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Esclusham	2008/1063	8.50	PR	Wrexham Rd, Rhostyllen	223	0	0	223	0	0	10	35	35	35	0	108	0
Esclusham	2011/0719	0.6133	PR	Site of Former Foundry, Mount Street, Rhostyllen, Wrexham	12	0	0	12	0	0	6	6	0	0	0	0	0
Esclusham	2012/0377	0.9522	PR	Imperial Commercials Ltd and adjoining land, Wrexham Road, Rhostyllen, LL14 4DP	22	0	0	22	0	0	0		11	11	0	0	0
Grand Total					257	0	0	257	0	0	16	41	46	46	0	108	0

Gresford

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Gresford	2005/0613 & 2013/0173	2.87	PR	Bryn y Groes, Chester Road, Gresford	60	0	0	60	0		30	30	0	0	0	0	0
Gresford	2010/0251 & 2012/0848 & 2013/0707 & 2013/0272	1.13	PR	Plot 8, Quarry Brow, Pant Lane, Gresford, Wrexham	19	12	2	5	0	3	2	0	0	0	0	0	0
Grand Total					79	12	2	65	0	3	32	30	0	0	0	0	0

Gwersyllt

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Gwersyllt	20044 & 2005/0576 & 2006/0601	1.75	PR	Oak Alyn Court, Cefn y Bedd	19	17	0	2	0	0	2	0	0	0	0	0	0
Gwersyllt	2006/0091 & 2010/0261 & 2010/0270	0.22	PR	land at Jutland Ave, Gwersyllt, LL11 4SB	14	2	0	1	11	1	0	0	0	0	0	0	0
Gwersyllt	2007/0649 & 2008/0348	0.65	PR	Livery Stables, Summerhill, LL11 4SW	14	0	0	14	0	0	0	0	0	0	0	0	14
Gwersyllt	2011/0709	0.49	PR	Land at Queens Head, Glanllyn Road, Bradley, Wrexham	13	0	6	0	7	0	0	0	0	0	0	0	0
Gwersyllt	20120506	0.67	PR	Celtic Yard Westminster Rise Summerhill	24	18	6	0	0	0	0	0	0	0	0	0	0
Grand Total					84	37	12	17	18	1	2	0	0	0	0	0	14

Maelor South

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Maelor South	2007/0353 & 2008/1147	4.50	PR	Penley Hospital, Penley, LL13 0JT	104	91	7	0	6	NA	NA	NA	NA	NA	NA	NA	NA
Grand Total					104	91	7	0	6	0	0	0	0	0	0	0	0

Offa

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Offa	2005/0541 (amended by 09/1004 and 2011/0700)	1.11	PR	Hightown Barracks, LL13 8NH (DOES NOT INC's 90 bed nursing home)	89	80	0	0	9	0	0	0	0	0	0	0	0
Offa	2008/0649 2012/0760 - for 76 units pending	3.75	PR	Land at Brother Site, Croesnewydd Road, Wrexham	84	0	0	84	0	0	0	0	0	0	0	84	0
Offa	2012/0059	3.00	PR	Western Gateway, Ruthin Road, Wrexham	100	0	0	100	0	0	20	30	30	20	0	0	0
Offa	2013/0443	0.1864	PR	Land at Pen Y Bryn Tenter Square, Tenter Lane, Wrexham, LL13 7LF	24	0	0	24	0	0	0	0	24	0	0	0	0
Offa	2013/0525	1.79	PR	Former Water Works & Social Club, Maesgwyn Road, Wrexham (Offa)	24	4	10	0	10	0	0	0	0	0	0	0	0
Offa	Housing (16)	4.73	Public	Bridge St / Cambrian Yard	25	0	0	25	0	0	0	0	0	0	0	25	0
Offa	2009/0903	0.90	PR	Dusseks Watery Road	80	0	0	80	0	0	0	36	36	8	0	0	0
Offa	2012/0059 & 2007/0039	3.59	PR	Ruthin Road, LL13 7TQ (udp 21)	297	275	22	0	0	0	0	0	0	0	0	0	0
Grand Total					723	359	32	313	19	0	20	66	90	28	0	109	0

Penycae

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Penycae	2012/0761	0.36	PR	Afoneitha Rd, Penycae	14	4	0	0	10	0	0	0	0	0	0	0	0
Grand Total					14	4	0	0	10	0	0	0	0	0	0	0	0

Rhosddu

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Rhosddu	2009/0833	0.13	PR	Regent House, Regent St, Wrexham	24	0	0	24	0	0	0	0	0	0	0	24	0
Grand Total					24	0	0	24	0	0	0	0	0	0	0	24	0

Rhos

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Rhos	2007/1069	0.29	PR	Moreton Depot, Moreton Ave, Johnstown, LL14 2AR	15	0	0	13	2	0	0	6	7	0	0	0	0
Rhos	2009/1030	1.058	PR	Land off North Road, Ponciau, Wrexham, LL14 1HF	17	0	0	17	0	0	10	7	0	0	0	0	0
Rhos	2012/0010	0.56	PR	Former ysgol Y Wern, Hill Street, Rhos, Wrexham, LL14 1LN	15	0	0	15	0	0	5	7	0	0	0	3	0
Rhos	2012/0561	0.4201	PR	New Foundry Buildings, Gutter Hill, Johnstown, Wrexham	12	0	0	12	0	6	6	0	0	0	0	0	0
Grand Total					59	0	0	57	2	6	21	20	7	0	0	3	0

Rossett

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Rossett	2009/0608	0.18	PR	Darland House, Dovenby and Malreath	10	0	0	0	10	0	0	0	0	0	0	0	0
Grand Total					10	0	0	0	10	0	0	0	0	0	0	0	0

Ruabon

Community	App No.	Site Area (Ha)	Public/Private/RSL	Site Address	Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
Ruabon	1641	1.61	PR	Wynnstay Hall (all applications)	83	76	0	7	0	0	0	0	0	0	0	7	0
Ruabon	2008/1208	0.15	PR	Park View, Wynnstay Colliery Yard, Ruabon, LL14 6DP	13	0	0	13	0	0	6	7	0	0	0	0	0
Ruabon	2013/0797	0.4925	RSL	Maelor Place, Ruabon	19	0	0	19	0	19	0	0	0	0	0	0	0
Grand Total					115	76	0	39	0	19	6	7	0	0	0	7	0

Grand Total					Total Units	Prev Comp	Total Comp 2014	NS	Total UC	2015	2016	2017	2018	2019	2*	3i	3ii
					2839	1182	151	1379	127	89	180	212	194	104	0	546	54

Appendix 2 – Past Completion Data

	Number of Homes Completed On		
Year	Large Sites	Small Sites	Total Completions
2007	750	198	948
2008	490	116	606
2009	296	157	453
2010	138	105	243
2011	210	95	305
2012	356	77	433
2013	175	64	239
2014	151	64	215

Appendix 3 – Previous Land Supply Data

	5 year supply - Number of Homes			Number of years supply		
Year	1	2	2*		3i	3ii
2007	546	1966	0	14.99	614	13
2008	411	1728	0	7.52	783	14
2009	154	1470	0	6.08	783	398
2010	175	1241	0	5.35	838	165
2011	381	968	0	3.9	1028	63
2012	191	786	0	3.5	824	52
2013	198	644	22	3.4	405	328
2014	89	690	0	3.1	546	54

Appendix 4 – Planning Inspector's Report



Adroddiad ar gyd- astudiaethau argaeledd tir ar gyfer tai

Report on Joint Housing Land Availability Study

gan P J Davies BSc(Hons) MA MRTPI
Arolygydd a benodir gan Weinidogion Cymru
Dyddiad: 15/12/2014

by P J Davies BSc(Hons) MA MRTPI
an Inspector appointed by the Welsh Ministers
Date: 15/12/2014

Ref: JHLAS/14/H6955/515999

Local Planning Authority: Wrexham County Borough Council

- This report concerns the Wrexham County Borough Council Joint Housing Land Availability Study (JHLAS) 2014.
- The matters in dispute are set out in the JHLAS Statement of Common Ground (SoCG) submitted to the Welsh Government in September 2014.

Recommendation

1. That the 2014 JHLAS housing land supply figure for the Wrexham County Borough Council area be determined as 3.1 years.

Context of the Recommendation

2. Local Planning Authorities have a duty to ensure that sufficient land is genuinely available or will become available to provide a 5-year supply of land for housing¹. The purpose of preparing a JHLAS is to:
 - Monitor the provision of market and affordable housing;
 - Provide an agreed statement of residential land availability for development planning and control purposes; and
 - Set out the need for action in situations where an insufficient supply is identified².
3. The scope of this report is to recommend an appropriate housing land supply figure in respect of the Wrexham County Borough Council area, in the light of the matters in dispute concerning the calculation of such a figure and the available evidence.

Main Issues

4. These are whether the 5 year housing land supply figure should be calculated using past building rates over the previous 5 or 10 years, and whether or not each of the disputed sites should count towards the 5 year land supply at the time of the base date of the study.

¹ PPW Edition 7 paragraph 9.2.3

² TAN 1: Joint Housing Land Availability Studies (June 2006) paragraph 2.1

Reasons

Method of Calculation

5. Technical Advice Note 1 (TAN 1) advises that completion figures for the 5 years preceding the base date of the study should be used but that a longer or shorter period may be appropriate in some circumstances. The Welsh Government (WG) JHLAS Guidance Note (Version 2 September 2012) advises that, in recognition of low delivery rates over recent years and the consequences of exceptional economic circumstances, the 10 years immediately preceding the study base date would be a more appropriate timeframe upon which to base the land supply calculation at present. The WG clarification letter dated 7 November 2013 regarding the JHLAS process makes no reference to amending the advice regarding the past building rate methodology.
6. The LPA states that using the 5 year past building rates will allow for better direct comparison with earlier JHLAS Reports and better reflect current market conditions. Nonetheless, the 2013 JHLAS report was based on the previous 10 years building rate, and it is clear from paragraph 2.11 of WG's Guidance Note that the reason for using a 10 year period is to allow for lower delivery rates in recent years by including years of higher completion levels.
7. Having had regard to the available evidence, TAN1 and the WG Guidance, I conclude that a 10 year period is more appropriate in this case. On this basis, the appropriate past build rate figure is 425.8 units per annum.

Disputed Sites

8. TAN 1 provides advice on the criteria to be applied in considering whether sites may be regarded as genuinely available within a five year period. The TAN also provides advice on sites that have remained in the land supply for periods well in excess of five years. I have considered each of the disputed sites on the available evidence and in line with the advice in the TAN and the WG Guidance. I have also had regard to the clarification letter dated 7 November 2013 from WG to Chief Planning Officers.
9. Wrexham Rd, Rhostyllen (2008/1063) (108 units in dispute): due to progress made towards discharging pre-commencement conditions, it was found reasonable to include 45 units towards the 2013 land supply. Information in the current SoCG indicates that all pre-commencement conditions have now been discharged and a material start has been made. The LPA wish to include all 223 units from the extant planning permission. However, information from the developer (National Trust) indicates that 108 units are expected to be completed outside of the study period. Whilst the LPA consider that these units should be classified as category 2*, paragraph 7.2.1 of TAN 1 confirms that "areas of low demand should be identified prior to categorisation of individual sites" and WG's Guidance Note states at paragraph 2.2 that "Category 2* should only be used for sites which are capable of being developed within the 5 year period, but which lie within areas where... development is unlikely to occur within 5 years". There is no information to suggest that the site is an area of low demand or that it should be classified as 2*. The guidance also makes it clear that where only part of a site is expected to be delivered, those rates should be set out in evidence. In this instance, the expected phasing information from the developer indicates that 108 units are expected to be delivered outside of the study period. I therefore find that none of the disputed units should be counted towards the 5 year land supply figure.

10. Regent House, Regent Street, Wrexham (2009/0833) (24 units in dispute): an update from the developer in June 2014 indicates that no development is expected within the study period, due to a lack of market demand. In the absence of any evidence to indicate the delivery of any units within the study period, I find that none of the disputed units should be counted towards the 5 year land supply figure.
11. Whilst the SoCG refers to 247 units being in dispute, this is based on all of the 233 units proposed at Wrexham Road, whereas 115 units on the latter are not in dispute. Therefore, having regard to the above, the land supply is 1,304 units.

Conclusion

12. Based on a housing land supply of 1,304 units, and a 10 year past building rate of 425.8 units pa, I conclude that the housing land supply figure for the Wrexham County Borough Council planning area as at 1 April 2014 should be calculated as 3.1 years.

P J Davies

Inspector