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Consultation – summary and assessment of responses

Technical Advice Note (TAN) 1: Joint Housing Land Availability Studies

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1. Introduction

- 1.1 A consultation exercise on the draft Technical Advice Note (TAN) 1 – Joint Housing Land Availability Studies (JHLAS) was launched on 18 July 2014 and was open for responses for 12 weeks until 10 October 2014. The consultation sought views on the Welsh Government’s proposed revision to TAN 1 which supports policy on housing land supply set out in Chapter 9 of *Planning Policy Wales* (PPW).
- 1.2 The primary aim of the review is to align the housing land supply and Local Development Plan monitoring processes. The review also forms part of the wider proposals to improve local delivery of the planning system, which are set out in the *Positive Planning* consultation paper.
- 1.3 A total of 9 questions were asked, eight based on the main changes and the ninth made available for further comments should respondents wish to provide additional observations or expand upon their previous answers.
- 1.4 This consultation summary report details the responses to the draft TAN 1 consultation exercise, the Welsh Government’s response and the next steps.

2. What was the consultation about?

- 2.1 New home building is essential in Wales, not only to meet the growing need for housing, but also as an important driver of economic development and job creation. The Welsh Government sees planning becoming an enabler of appropriate development that supports national, local and community objectives, including the delivery of new homes. The Welsh Government’s *Positive Planning* consultation paper outlines proposals to achieve this.
- 2.2 Having up-to-date Local Development Plans (LDPs) in place is critical for ensuring that the homes needed are delivered. The planning system, through the LDP process, must provide the land that is needed to allow for new home building. Appropriate monitoring of housing land supply is a very important element of ensuring that this is achieved.
- 2.3 Joint Housing Land Availability Studies (JHLAS) are the principal mechanism for monitoring the supply of housing land through the planning system. JHLAS demonstrate whether local planning authorities have a deliverable five-year supply of land for housing as required by Welsh Government policy (*Planning Policy Wales*, paragraph 9.2.3). Failure to have a five-year housing land supply is an important material consideration which is taken into account by Planning Inspectors when determining planning appeals for residential schemes.
- 2.4 Guidance on how to undertake JHLAS is set out in TAN 1. TANs supplement the land use planning policies of the Welsh Government in *Planning Policy Wales*, providing additional advice and guidance on specific subjects. Together *Planning Policy Wales* and the TANs provide the framework for the preparation of LDPs and the decision-making responsibilities of local planning authorities.
- 2.5 The current review of TAN 1 has the overriding aim of aligning the JHLAS and LDP monitoring processes and contributing to incentivising the preparation and adoption of LDPs and the draft TAN set out proposals to achieve this.

3. Why are we proposing change?

3.1 The JHLAS process was last reviewed in 2011 and resulted in improvements in the consistency of data and in the timeliness of the studies; both these elements have improved their usefulness to developers, local planning authorities and Planning Inspectors. Since the 2011 review a number of factors have had a significant bearing on housing land supply:

- The difficult economic conditions have continued, having a detrimental effect on the viability of housing developments;
- The *Positive Planning* consultation has been published, including proposals to reinforce LDPs as the cornerstone of the planning system; and
- There has been progress with the adoption of LDPs, with more than half of local planning authorities (16) now having an adopted plan.

3.2 These factors, in particular the progress with LDP adoption, provide a firm basis for this review of the way in which housing land supply is monitored.

4. What were the main changes proposed?

4.1 The main changes to TAN 1 that were proposed are set out below, with an indication of the relevant sections of the consultation draft of the revised TAN.

Purpose / Context (sections 2 and 3) – Highlights the need for housing land supply to be based on adopted LDPs and the importance the Welsh Government places on achieving full LDP coverage across Wales. Also outlines the links between the JHLAS and LDP processes.

Study preparation (section 4.1) – As part of aligning the JHLAS and LDP monitoring processes, it is proposed that the period for completing the studies is reduced from 12 months to 6 months. This is to ensure that the most up-to-date housing land supply figure can be included in LDP Annual Monitoring Reports (AMRs), which must be submitted to the Welsh Government by 31st October each year following LDP adoption. (AMRs are the mechanism by which local planning authorities assess whether their LDPs are meeting their objectives.)

Sites for inclusion in the housing land supply (section 4.3) – Sites to be included in the five-year housing land supply must have outline or full planning permission or be identified for residential purposes in an adopted LDP. It is proposed that sites that have a resolution to grant planning permission subject to the signing of a section 106 agreement can be included where there is clear evidence that the site will be developed within five years. However, where a section 106 agreement remains unsigned for more than a year the site should be removed from the five year supply.

Site Categorisation (section 4.4) – It is proposed that greater delineation is introduced into the site categorisation to provide more precise information about why a site has not been included in the five-year housing land supply. This is intended to assist in the understanding of a local planning authority's housing land supply.

Calculating housing land supply (section 5) – Land supply needs to be soundly based on meeting identified housing requirements. Therefore it is proposed that only local planning authorities with an adopted LDP (or an adopted Unitary Development Plan that is still within the plan period) will be able to undertake a

JHLAS calculation and thus be able to demonstrate that they have a five-year housing land supply. In line with this, it is also proposed that the residual methodology based on an adopted LDP (or UDP) will be the only methodology allowed for calculating housing land supply.

Housing Supply Figure (section 6) – Where a local planning authority has an undersupply of housing land (i.e. less than five years) it is proposed that the action to be taken would no longer be set out in the JHLAS report, but would be addressed in the AMR in order to link it directly with LDP monitoring. Consistent with the integration of the JHLAS and LDP processes, this proposal places the focus on the AMR as the mechanism for responding to a local planning authority's housing land supply position.

JHLAS process (section 7.3) – Study Group meetings are seen as the best way for disputed matters to be resolved, but have not been consistently held under the current arrangements. Therefore it is proposed that where sites are disputed by members of a JHLAS Study Group, a Study Group meeting must be held to try and resolve these matters.

Transitional arrangements (section 8) – It is recognised that local planning authorities with an adopted UDP (that is within its plan period at the base date of the JHLAS) do have a sound basis for calculating housing land supply. Transitional arrangements are proposed for those authorities with an adopted UDP and which are preparing their LDP.

5. Next Steps

- 5.1 This Consultation Summary Report is published alongside the revised Technical Advice Note (TAN) 1: Joint Housing Land Availability Studies (JHLAS) (January 2015). It is proposed that the revised TAN 1 will be operational for the 2015 JHLAS process.
- 5.2 Technical Advice Note (Wales) 1: Joint Housing Land Availability Studies (June 2006) and Guidance Note – Joint Housing Land Availability Study process (September 2012) will be cancelled.

6. Details of Responses

- 6.1 All responses have been considered fully in preparing Technical Advice Note (TAN) 1 – Joint Housing Land Availability Studies (JHLAS) (January 2015).
- 6.2 The consultees were drawn from the core stakeholders consultation list held by the Planning Directorate of the Welsh Government. These stakeholders included all local planning authorities in Wales, together with relevant public bodies, businesses, special interest groups, professional bodies and other interest groups. The consultation document was also made available on the Welsh Government consultation website.
- 6.3 In total, 48 consultation responses were received. There were 15 responses from the businesses sector, 24 from local planning authorities, 6 from professional bodies / interest groups and 3 from members of the public. **Appendix A** includes a list of all respondents. Copies of the individual consultation responses are available on request.

6.4 A summary of the questions can be seen below in Section 8. A statistical overview of all responses is available in Annex B.

7. Summary of the Key Themes / Issues

7.1 From the analysis of the consultation responses the following key themes / issues have been derived:

- There was general agreement that there is a need to strengthen the links between the JHLAS process and the Local Development Plan Annual Monitoring Report (AMR).
- There was uncertainty, predominantly from the LPAs, as to whether it is feasible to complete the JHLAS within the proposed 6 month timetable.
- The business sector expressed concern that the 5 year housing land supply figure will be skewed by the inclusion of sites subject to section 106 agreements.
- The majority of LPAs agreed with the proposal to include sites subject to section 106 agreements in the 5 year housing land supply subject to their removal if the agreement remains unsigned after 1 year.
- A number of LPAs stated that due to the protracted nature and complexities of some Section 106 agreements the period that these sites can be included in the land supply should be increased.
- There was general support for the removal of category 2* (sites in areas of low demand) and the principle of updating the site categorisation. However, many considered that there was a need for clarification in respect of each category.
- Businesses generally objected to the proposed category 4, that referred to 'developers business decisions' affecting the delivery of sites.
- LPAs considered that the proposed exclusion of category 4 from the 5 year housing land supply related more to housing delivery rather than land availability.
- The LPAs generally disagreed that only local authorities with an adopted development plan should be able to undertake a JHLAS calculation. The LPAs that disagreed with this proposal raised concerns about it resulting in 'planning by appeal' and that an authority that was not able to prepare a JHLAS would have no indication of any shortfall in its housing supply.

- The LPAs also generally disagreed with the sole use of the residual methodology, arguing that the past build rates methodology should be retained for those authorities without an adopted plan. Some also expressed the view that this proposal would prevent them from complying with the Welsh Government’s policy on maintaining a five-year supply of housing land.
- Businesses consider that the ‘past build rates’ methodology rewarded authorities that were poor performers in terms of preparing an LDP as it could result in artificially high housing land supply figures due to low build rates over recent years.

8. Statistical Breakdown and Overview of the Responses to Each Question

8.1 A summary of the key findings under each consultation question is set out below. This section provides a detailed summary and analysis of the key themes generated for each question followed by the Welsh Government’s response.

Question 1:

Do you agree that the JHLAS and LDP AMR processes should be more closely aligned?

Question 1	Businesses	LPA	Professional Bodies / Interest Groups	Other	Total	%
Agree	15	15	3	2	35	73
Neither Agree nor Disagree	0	7	3	1	11	23
Disagree	0	2	0	0	2	4

Statistical Review

Nearly three quarters (73%) of respondents agreed that the JHLAS and Local Development Plan Annual Monitoring Report (AMR) processes should be more closely aligned with only 4% disagreeing. The largest group responding positively to this question was businesses with all 15 in favour of this proposal. The remaining 23% of respondents did not have a firm view or expressed both positive and negative views on the proposal.

Overview

The majority of respondents supported the need to strengthen the links between the JHLAS process and the AMR. Respondents considered that it was both important and logical to link the processes, however many questioned how this would work in practice.

A further concern, predominantly expressed by the business sector, related to the implications for the AMR if the JHLAS process was not completed in time. They also

questioned whether the AMR process would provide a quick enough response where a local authority has an undersupply of housing land.

Welsh Government Response

The current review of TAN 1 has the overriding aim of aligning the JHLAS and LDP monitoring processes and contributing to incentivising the preparation and adoption of LDPs. This review also links with the wider proposals to improve local delivery of the planning system, which are set out in the *Positive Planning* consultation paper.

The proposed changes to the timetable (see response to Question 2) should assist in ensuring that the JHLAS land supply figure will be available for inclusion in an AMR. The JHLAS, as outlined in the TAN, details the process of calculating the housing land supply figure and the AMR will determine what action, if any, needs to be taken. Where a shortfall in the housing land supply is identified the local planning authority, through the AMR process, should consider the reasons for the shortfall and whether the LDP should be reviewed either in whole or in part.

Question 2:

To enable the most up-to-date JHLAS to feed into the AMR it is proposed to shorten the timetable for its preparation to six months. Do you agree that it is feasible to prepare a JHLAS in this revised timeframe?

Question 2	Businesses	LPA	Professional Bodies / Interest Groups	Other	Total	%
Agree	13	6	1	1	21	44
Neither Agree nor Disagree	1	6	2	2	11	23
Disagree	1	12	3	0	16	33

Statistical Review

This question generated a mixed response with 44% of respondents agreeing that it is feasible to prepare a JHLAS in the revised 6 month timeframe and 33% disagreeing. Although the remaining 23% of respondents did not express a firm view on the proposal, many offered concern around the revised timeframe. Concern was predominantly expressed by LPA`s with 50% stating that the JHLAS could not be prepared within 6 months.

Overview

There was uncertainty, predominantly from the LPAs, as to whether it is feasible to complete the JHLAS within the proposed 6 month timetable. Many respondents acknowledged that some LPAs will be able to complete a JHLAS within the 6 month timeframe; however this is dependant on the resources of the LPA and other members of the study group.

Many of the LPAs stated that resources are under severe pressure and considered that a proposal requesting the JHLAS to be carried out in half the time, with no additional resources, is unrealistic.

Welsh Government Response

The Welsh Government advocates that Local Planning Authorities should maintain the evidence base for JHLAS throughout the year, however it is proposed to explicitly allow an additional 3 months at the start of the JHLA process for 'evidence gathering' (i.e. 1 January to 31 March). This will cover desk based site specific survey work such as contacting developers and landowners for information on their future development intentions. This will allow partial completion of the site proformas and schedules prior to 1st April ready for the site visits to be conducted. This adds additional flexibility in the process and allows for completion of the studies and for inclusion of the housing land supply figure in the AMR.

Question 3:

Do you agree that sites subject to section 106 agreements should be included in the 5 year housing land supply subject to their removal if the agreement remains unsigned after 1 year?

Question 3	Businesses	LPA	Professional Bodies / Interest Groups	Other	Total	%
Agree	1	18	3	2	24	50
Neither Agree nor Disagree	0	3	1	1	5	10
Disagree	14	3	2	0	19	40

Statistical Review

This question produced a divergent response, with a clear split between respondents agreeing (50%) and disagreeing with this proposal (40%). There was also a clear split between the sectors with 18 (75%) of the LPAs in favour of the inclusion of section 106 sites in the 5-year land supply and 14 (93%) of the Businesses against.

Overview

Both businesses and LPAs acknowledged that sites subject to section 106 agreements are often of strategic importance and can form an important part of the housing land supply. However, the Business sector expressed concern that, on larger sites, section 106 agreements can often be complex and take time to complete. Consequently the 5 year housing land supply figure would be skewed by the inclusion of these sites which could be included in the land supply one year but removed when the section 106 agreement is not signed.

A number of LPAs stated that due to the protracted nature and complexities of some section 106 agreements, the 12 month period should be increased with many respondents suggesting a 2 year time period to be appropriate.

Welsh Government Response

The Welsh Government considers that sites which have a resolution to grant planning permission subject to the signing of a section 106 agreement can play an important part of the housing land supply. Consequently, they should be included where there is clear evidence that the site will be developed within five years.

However, additional clarification is included in the revised TAN stating that Study Groups should not include sites where there is clear evidence that the section 106 agreement will not be signed within 12 months from the date of the resolution to grant planning permission. Conversely sites can be included in the 5-year supply where there is evidence that the section 106 agreement is due to be signed shortly after the expiry of the 12 month time period. However, in both eventualities, Study Groups will need to discuss each case individually and take a reasonable evidence-based decision.

Question 4

Greater delineation has been introduced into the site categorisation to give more precise information about why a site has not been included in the 5 year housing land supply. The former 2* category (sites affected by low market demand) has been removed as a result. Do you agree that these changes will assist in the understanding of a local planning authority's housing land supply?

Question 4	Businesses	LPA	Professional Bodies / Interest Groups	Other	Total	%
Agree	11	7	1	1	20	42
Neither Agree nor Disagree	2	8	2	1	13	27
Disagree	2	9	3	1	15	31

Statistical Review

There was a very mixed response to this proposal with 42% agreeing with the greater delineation introduced into the site categorisation and 31% disagreeing. Over a quarter of respondents neither agreed or disagreed with the proposal with many stating that they agreed with the principle but did not agree with the categories as drafted.

Overview

The revised categories drew a lot of comments, with many supporting the removal of category 2* and the principle of updating the categories. However many considered that there was a need for clarification in respect of certain categories.

Businesses generally objected to category 4, particularly the use of the terms 'developers build rates' and 'business decisions'. Businesses stated that it is external factors, such as the market that dictates how quickly a site can be built, rather than the business decisions of a developer. Therefore, they considered it unfair and inaccurate to suggest that sites would be held back by the 'business decisions' of individual developers.

Local authorities considered that the proposed exclusion of category 4 from the 5 year housing land supply related more to housing delivery rather than availability. The LPA's and certain professional bodies stated that the omission of category 4 sites tilts the balance of the JHLAS process too far towards the interests of the development industry.

Many respondents suggested that the categories could be shortened, by combining category 1 and 2.

Welsh Government Response

It is agreed that category 4 created uncertainty and confusion in the land supply categorisation. The site categories have been revised in the TAN with the deletion of category 4 and the combining of categories 1 and 2.

Question 5:

It is proposed that only local planning authorities with an adopted LDP (or an adopted UDP that is still within the plan period) will be able to undertake a JHLAS calculation (using the residual methodology) and thus be able to demonstrate that they have a 5 year housing land supply. Do you agree with this approach, which is aimed at incentivising the preparation and adoption of LDP's?

Question 5	Businesses	LPA	Professional Bodies / Interest Groups	Other	Total	%
Agree	15	7	2	0	24	50
Neither Agree nor Disagree	0	4	1	1	6	12
Disagree	0	13	3	2	18	38

Statistical Review

Half (50%) of respondents agreed with the proposal that only local planning authorities with an adopted LDP (or an adopted UDP that is still within the plan period) should be able to undertake a JHLAS calculation. All 15 of the businesses were in favour of this proposal, in contrast to 7 (29%) of the local planning authorities.

Overview

The local planning authorities that disagreed with this proposal raised concerns about it resulting in 'planning by appeal' and that an authority that was not able to prepare a JHLAS would have no indication of any shortfall in its housing land supply. Some businesses, although agreeing with the proposal and the need to incentivise the adoption of LDPs, considered that those authorities without an adopted plan needed to be able to assess their housing land supply and suggested using the "objectively assessed need" calculated for emerging LDPs as the basis for such a calculation. Some of the professional bodies were also concerned about the 'planning by appeal' scenario and questioned the appropriateness of using the JHLAS process to incentivise LDPs.

Welsh Government Response

LDPs remain the cornerstone of the planning system in Wales, as has been reinforced by the Welsh Government's *Positive Planning* proposals. Housing land availability needs to be soundly based on meeting the housing requirements that each local planning authority has identified, which requires an adopted LDP to be in place. Progress towards complete coverage of adopted LDPs across Wales therefore needs to be maintained.

Only four local planning authorities will be without either an adopted LDP or a Unitary Development Plan (UDP) that is still within its plan period and therefore unable to use the JHLAS process to calculate their housing land supply in 2015 (based on current LDP timetables). A further one authority will be similarly affected in 2016.

Question 6:

It is proposed that the residual methodology based on an adopted LDP or UDP will be the only methodology allowed for calculating housing land supply. Do you agree with this approach?

Question 6	Businesses	LPA	Professional Bodies / Interest Groups	Other	Total	%
Agree	15	4	2	0	21	44
Neither Agree nor Disagree	0	1	2	2	5	10
Disagree	0	19	2	1	22	46

Statistical Review

Opinion on this proposal was almost evenly split, with 44% of respondents agreeing that only the residual methodology should be used to calculate housing land supply and 46% disagreeing. All businesses were in favour, along with 4 (17%) local planning authorities. In contrast, 79% of local planning authorities disagreed with this proposal. Professional bodies were evenly split, with 33% agreeing, 33% disagreeing and 33% neither agreeing nor disagreeing.

Overview

The local planning authorities that disagreed with the sole use of the residual methodology highlighted what they perceived to be its inadequacies and considered that the 'past build rates' methodology should be retained for those authorities without an adopted plan. This view was supported by some of the professional bodies. However, businesses considered that the 'past build rates' methodology rewarded authorities that were poor performers in terms of preparing an LDP as it could result in artificially high housing land supply figures due to low build rates over recent years.

Welsh Government Response

As stated under Question 5 above, housing land availability needs to be soundly based on meeting the housing requirements that each local planning authority has identified, which requires an adopted LDP to be in place. The 'past build rates' methodology is based on the past performance of the house-building industry and therefore does not assess a local planning authority's ability to meet its identified housing requirements.

Question 7:

Where a LPA has an undersupply of housing land (i.e. less than 5 years) it is proposed that the action to be taken would no longer be set out in the JHLAS report, but would be addressed in the AMR in order to link it directly with LDP monitoring. Do you agree with this approach?

Question 7	Businesses	LPA	Professional Bodies / Interest Groups	Other	Total	%
Agree	4	13	2	2	21	44
Neither Agree nor Disagree	4	7	4	1	16	33
Disagree	7	4	0	0	11	23

Statistical Review

The responses to this proposal provide a mixed picture. 44% of respondents agreed that the LDP Annual Monitoring Report (AMR) is the most appropriate place for any action to be identified to address an under-supply of housing land. 23% of respondents disagreed and 33% neither agreed nor disagreed. Almost half (47%) the businesses disagreed, with the remainder evenly split between agreeing (26%) and neither agreeing nor disagreeing (26%). 54% of local planning authorities agreed, with a further 29% neither agreeing nor disagreeing and 17% disagreeing. 33% of professional bodies agreed, with 66% neither agreeing nor disagreeing with the proposal.

Overview

A number of businesses argued that a local planning authority's proposed actions in response to an under-supply of housing land should be included in both their JHLAS report and in their AMR in case either document is not prepared within the required timescale. This view was shared by some professional bodies and some local planning authorities.

Welsh Government Response

One of the aims of this review of TAN 1 is to link the JHLAS process directly with the LDP monitoring process (i.e. the AMR). The result of the JHLAS process is the housing land supply figure and it is for the AMR to assess this figure and determine what action, if any, needs to be taken.

Question 8:

Do you agree that where the inclusion of sites is disputed by members of the Study Group, a Study Group meeting must be held?

Question 8	Businesses	LPA	Professional Bodies / Interest Groups	Other	Total	%
Agree	9	6	2	1	18	37
Neither Agree nor Disagree	1	5	2	2	10	21
Disagree	5	13	2	0	20	42

Statistical Review

Respondents were fairly evenly split on this proposal, with 37% agreeing and 42% disagreeing that a Study Group meeting must be held where there are disputes regarding the inclusion of sites. Just over one fifth (21%) of respondents neither agreed nor disagreed. 60% of businesses agreed with this proposal, compared with only 25% of local planning authorities. 33% of businesses and 54% of local planning authorities disagreed with this proposal. Professional bodies were also evenly split, with 33% agreeing, 33% disagreeing and 33% neither agreeing nor disagreeing.

Overview

Those local planning authorities and professional bodies that disagreed with this proposal were concerned that it could adversely impact on achieving the completion of the JHLAS process within the required timeframe. Local planning authorities, businesses and professional bodies expressed the view that Study Group meetings should be retained as an option only.

Welsh Government Response

Given the mixed response to this proposal, and as the holding of Study Group meetings is essentially a matter for each Study Group to consider, it is proposed that

these meetings will remain as an option, with the existing proviso that such a meeting must be held when requested by a member of a Study Group.

Question 9 – Any other comments

A few other issues were raised by a number of respondents and these are summarised below:

- A request for clarification on the treatment of student accommodation, Gypsy / Traveller sites and extra care housing within housing land supply.
- A request for more guidance on the role and responsibilities of Study Groups.
- A need for the introduction of a compulsory 'flexibility allowance' of 20% of housing land for local planning authorities that consistently fail to have the required 5-year housing land supply.

Welsh Government Response

The revised TAN will clarify that the JHLAS process is only concerned with housing that falls within 'Use Class' C3: Dwellinghouses (Family houses or houses occupied by up to six residents living together as a single household, including a household where care is provided for residents).

Additional wording will be added to the section on Study Groups (section 4.2) to set out their role and responsibilities.

In preparing local development plans, local planning authorities are encouraged to include a flexibility allowance (normally in the region of 10%) to try to ensure that sufficient land is available to meet their housing proposals. The introduction of a further 20% buffer is therefore not considered necessary. In addition, the issue with low land supply is often related to development viability and therefore to deliverability, rather than a physical shortage of land.

Annex A - Full List of Respondents by Category

	Businesses		Local Planning Authorities
1	Anwyl Construction Ltd	1	Blaenau Gwent County Borough Council
2	Barratt Homes	2	Brecon Beacons National Park Authority
3	Barton Wilmore	3	Bridgend County Borough Council
4	Boyer Planning	4	Caerphilly County Borough Council
5	Crag Hill Estates Ltd	5	City of Cardiff Council
6	Llanmoor Development Company Limited	6	Carmarthenshire County Council
7	Nathanial Lichfield and Partners	7	Ceredigion County Council
8	Persimmon Homes West Wales / East Wales	8	Conwy County Borough Council
9	Redrow Homes South Wales	9	Denbighshire County Council
10	Rothschild Trust	10	Flintshire County Council
11	RPS Planning & Development	11	Gwynedd Council & Isle of Anglesey County Council
12	Savills	12	Merthyr Tydfil County Borough Council
13	Taylor Wimpey South Wales	13	Monmouthshire County Council
14	UK Land and Property	14	Neath Port Talbot County Borough Council
15	Welsh Water	15	Newport City Council
	Total: 15	16	Pembrokeshire County Council
		17	Pembrokeshire Coast National Park Authority
	Professional Bodies / Interest Groups	18	Powys County Council
1	Community Housing Cymru Group	19	Rhondda Cynon Taf County Borough Council
2	Home Builders Federation	20	Snowdonia National Park Authority
3	North Wales Planning Officers Group	21	City & County of Swansea
4	RICS Wales	22	Torfaen County Borough Council
5	RTPI Cymru	23	Vale of Glamorgan Council
6	Welsh Local Government Association	24	Wrexham County Borough Council
	Total: 6		Total: 24
	Other		
1	John Harper		
2	Kristina Martinsson		
3	Roger Tanner		
	Total: 3		Total:48

Annex B – Statistical Overview of all Responses

The table below provides an overview of all responses to the questionnaire. It is based on the tables in the section on Statistical Breakdown and Overview of the Responses to Each Question and gives a strategic outline of the overall responses to the consultation on TAN 1 and their relative support for the questions posed.

Consultation question	Agree; Neither Agree nor Disagree; Disagree	Businesses	LPA	Professional Bodies / Interest Groups	Other	Total	%
1. Do you agree that the JHLAS and LDP AMR processes should be more closely aligned?	Agree	15	15	3	2	35	72.92
	NAD	0	7	3	1	11	22.92
	Disagree	0	2	0	0	2	4.17
2. To enable the most up-to-date JHLAS to feed into the AMR it is proposed to shorten the timetable for its preparation to six months. Do you agree that it is feasible to prepare a JHLAS in this revised timeframe?	Agree	13	6	1	1	21	43.75
	NAD	1	6	2	2	11	22.92
	Disagree	1	12	3	0	16	33.33
3. Do you agree that sites subject to section 106 agreements should be included in the 5 year housing land supply (subject to their removal if the agreement remains unsigned after 1 year)?	Agree	1	18	3	2	24	50
	NAD	0	3	1	1	5	10.42
	Disagree	14	3	2	0	19	39.58
4. Greater delineation has been introduced into the site categorisation to give more precise information about why	Agree	11	7	1	1	20	41.67

a site has not been included in the 5 year housing land supply. The former 2* category (sites affected by low market demand) has been removed as a result. Do you agree that these changes will assist in the understanding of a local planning authority's housing land supply?	NAD	2	8	2	1	13	27.08
	Disagree	2	9	3	1	15	31.25
5. It is proposed that only local planning authorities with an adopted LDP (or an adopted UDP that is still within the plan period) will be able to undertake a JHLAS calculation (using the residual methodology) and thus be able to demonstrate that they have a 5 year housing land supply. Do you agree with this approach, which is aimed at incentivising the preparation and adoption of LDP's?	A	15	7	2	0	24	50
	NAD	0	4	1	1	6	12.5
	D	0	13	3	2	18	37.5
6. It is proposed that the residual methodology based on an adopted LDP or UDP will be the only methodology allowed for calculating housing land supply. Do you agree with this approach?	A	15	4	2	0	21	43.75
	NAD	0	1	2	2	5	10.42
	D	0	19	2	1	22	45.83
7. Where a LPA has an undersupply of housing land (i.e. less than 5 years) it is	A	4	13	2	2	21	43.75

proposed that the action to be taken would no longer be set out in the JHLAS report, but would be addressed in the AMR in order to link it directly with LDP monitoring. Do you agree with this approach?	NAD	4	7	4	1	16	33.33
	D	7	4	0	0	11	22.92
8. Do you agree that where the inclusion of sites is disputed by members of the Study Group, a Study Group meeting <i>must</i> be held?	A	9	6	2	1	18	37.5
	NAD	1	5	2	2	10	20.83
	D	5	13	2	0	20	41.67