

### **Matter 13 – Affordable Housing and HMOs**

Key Issue:

Will the housing proposed meet the needs of those in the County who have special requirements? Are the assessments for specialist housing based on robust and credible evidence? Is it deliverable? Are the policies for affordable housing, annexe accommodation and for houses in multiple occupation clear, reasonable and appropriate?

#### **Affordable Housing**

b) Will the affordable housing target meet the local housing need? If not, what other mechanisms are available?

**HBF notes that it is common for the level of affordable housing delivered by an LDP to be below that identified by the LHMA. There are two main ways in which affordable housing is delivered firstly through Welsh Government grant funded schemes, however these are limited in number due to limited grant availability across Wales. The second method is through private developer contribution, as a result of a policy requirement for a percentage of all new development to either provide affordable homes on site or a financial contribution in lieu of onsite provision. Due to the price obtained for these on-site homes which is set by Welsh Government they are effectively a cost to the developer and therefore the more affordable homes required the less viable the scheme becomes. Therefore, a high-level visibility exercise for the area will identify the acceptable level of affordable housing for the area which will not result in private development no coming forward.**

**Further, many Councils do have land available to allow affordable homes to be built on and as the cost of land for housing development is one of the largest costs the willingness to reduce capital receipt can allow schemes with a higher level of affordable housing to come forward. This is something which has been recognised by the Housing Minister who wrote to Laths in July 2019 stating:**

***‘When reviewing LDPs local planning authorities must make provision for affordable housing led housing sites. Such sites will include at least 50% affordable housing, which is defined as social rented housing provided by local authorities and registered social landlords, and intermediate housing where prices or rents are above those of social rent but below market levels and there are secure arrangements to recycle receipts to use for future affordable housing where full ownership is achieved. In the first instance affordable housing led housing sites should make use of public land. Where public land is not available, privately owned land may be identified. Sites should not be inferior in any way to sites which are being promoted for market housing.’***

**It is not clear if the Council have given any consideration to allocating such sites.**

e) Are the requirements of Policy HN3 clear, and consistent with national policy?

**Further to HBF’s Deposit Plan representations our reference to PPW10 and par. 4.2.21 we would note that this should have referenced par. 4.2.28 this paragraph remains the same in PPW11 stating:**

***‘Development plans must include a target for affordable housing (expressed as numbers of homes).’***

**Therefore, the HBF suggest that the affordable housing percentage requirements should not be referred to as a 'starting point' for negotiations as this provided no certainty to landowners or developers and could result in the site not coming forward. They should instead as in other LDPs be described as a 'target' as advised in PPW11.**

**Further the policy should not suggest that there will be a need to carry out a detailed viability assessment on ever site, if a development comes forward which is policy compliant then there is no need for the applicant to provide additional viability evidence.**

g) How will off-site or commuted sum contributions for affordable housing be secured and managed? What mechanisms are in place to ensure that the level of contributions sought are appropriate?

**Although the Council identify that this will be dealt with in the Affordable Housing SPG the current Affordable Housing SPG document was adopted in 2017 and contains no guidance on commuted sum. This means there is likely to be a delay in bringing forward this guidance which could affect the delivery of schemes.**

m) Will the affordable housing policies ensure a balanced mix of house types, tenures and sizes, and is the required density level appropriate?

**The HBF does not consider this an area where planning policy should be over prescriptive and consider that Policy HN2 - Density and Mix of Development finds the right balance between encouraging without being overly prescriptive. The mix of housing types should be left to the market when it comes to private housing. In terms of the affordable housing the RSL who will be responsible for them are in the best place to discuss the mix of house types rather than it being set by policy.**