

ANGLESEY AND GWYNEDD JOINT LOCAL DEVELOPMENT PLAN (2011 - 2026)

PUBLIC EXAMINATION:

Hearing Session 4 - Affordable Housing



ISLE OF ANGLESEY
COUNTY COUNCIL

Action Point (S4 / PG3) - Supply of affordable housing

1. The matter under consideration:

Prepare a paper to provide a fuller explanation on how the Plan maximises the supply opportunities for the provision of affordable housing. All opportunities to contribute to the supply of affordable housing should be identified.

2. Councils' response:

2.1 Question 4a for Hearing Session 4 on affordable housing asked the following question:

Does the Plan maximise the delivery opportunities for the provision of affordable housing, including in terms of the percentage contributions sought in the 'housing pricing areas'?

2.2 Briefly, the Council's response to this question made the following points:

- The affordable housing targets are based on the Affordable Housing Viability Study;
- This Study suggested three options for the formulation of targets for the percentage of affordable housing developments sought by Policy TAI 9. A two-way split was selected (at least 15% or 25% affordable housing, depending on the house price area) based on the expected number of affordable units this would be likely to provide compared with other options;
- The thresholds, in terms of when it would be appropriate to ensure the provision of affordable housing, is lower than in the current development plans.

2.3 Further to the content of this response, the way the Plan promotes the highest possible supply of affordable housing is highlighted below:

2.4 **Affordable housing provision targets and thresholds** - An additional action point (S4/PG5) deals with the conclusions of the Affordable Housing Viability Study and its impact on the Plan in terms of providing opportunities to deliver affordable housing:

"Re-consider the conclusions of Affordable Housing Viability Study to identify affordable housing indicative targets that could yield as many affordable houses as possible and provide clear guidance to house builders".

- 2.5 The response to this action point will re-examine the affordable housing targets for the different house price areas and also consider the relevant thresholds for the various categories of settlements in order to ensure that the Plan facilitates the maximum number of affordable units.
- 2.6 **Pro rata contribution** - When an affordable housing requirement in a specific scheme falls under one dwelling, the Plan (Policy TAI 9) states that provision of an affordable unit should continue to be a priority. However, if this is not possible, unlike the current development plans, the Plan promotes a pro rata financial contribution instead of not having any affordable provision at all. Therefore, the Plan promotes affordable provision in circumstances where it did not do so previously. This will also ensure that developers cannot avoid making a provision/contribution by reducing the number of affordable units to a level which is below a defined threshold.
- 2.7 **Housing allocations** - The work of preparing the Plan has identified the sites that are most suitable and relevant for allocating to meet a proportion of housing demand during the Plan period. This means that these sites are actually available for development, convenient for development, and in the most sustainable and appropriate locations.
- 2.8 It is important to get the balance right between the role of the relevant centres within the settlement hierarchy and the suitability of a site for development. This is important in ensuring that development is realised. In accordance with the contents of Policy TAI 9, it would be expected that these sites provide the relevant percentage of affordable housing. Therefore the selection of these relevant sites provides the best chance of ensuring that the maximum number of affordable units can be provided.
- 2.9 The Councils have therefore avoided identifying sites where there are factors that make development expensive and which is likely to reduce the amount of affordable housing that can be provided. In this regard, it is noted that:
- Although the Plan promotes the use of previously developed land where appropriate, the allocations do not depend on brownfield industrial land where there would be significant costs in terms of remediation of contaminated land;
 - No major site with several landowners has been allocated, which would be complicated to develop and therefore carry a risk of not being developed on a timely basis;
 - Many sites are allocated where appropriate infrastructure already exists and where there would be no need to ensure extensive new provision. Such considerations include a suitable water supply and sewerage and easy access to the site. Such problems can result in additional costs and uncertainties in undertaking a timely development;
 - Site topography – the avoidance of sites where development would have significant associated costs e.g. steep terrain.
 - The Plan, in appropriate circumstances, has allocated sites owned by the Council. It is noted, for example, that Gwynedd Council is giving the first

opportunity to develop such sites to Housing Associations that are active in the area and the Isle of Anglesey County Council also has initiatives underway to develop its own houses. It would be expected therefore that significant provision of affordable housing would be provided on these sites.

- 2.10 **Clusters** - The Plan only promotes affordable housing within the clusters category. This means a change of policy for Anglesey, as existing planning policies allow open market housing in this type of settlement.
- 2.11 **Exception Policy** - If there is a proven local need for affordable housing that cannot reasonably be addressed within the development boundaries, the Plan provides the opportunity to develop such housing on sites immediately adjacent to the development boundaries. Unlike the provision in the Gwynedd Unitary Development Plan, which only uses this policy for smaller centres and villages, the Joint Local Development Plan provides opportunities for such development in Gwynedd's urban service centres as well (i.e. Bangor, Caernarfon, Pwllheli, Porthmadog and Blaenau Ffestiniog).
- 2.12 **Conversion of buildings in the countryside** - Policy TAI 19 of the Joint Local Development Plan, in accordance with national guidelines, allows the conversion of traditional buildings for residential use in the countryside where there is evidence that there is no viable employment use for the building and that the development will provide affordable housing for local need (the terminology has been revised to match the revised Glossary and is highlighted in response to the Action Points S1/PG2 and S3/PG6), or that the residential use is a subordinate element associated with a wider scheme for business re-use. While this principle is consistent with the content of the Gwynedd Unitary Development Plan, it is quite different from the corresponding existing policy in Anglesey. There is no requirement in Anglesey for such units to be affordable. Therefore Policy TAI 19 will add to the scope for increasing the supply of affordable housing, especially in Anglesey.
- 2.13 **Rural Enterprise Housing** - In accordance with paragraph 9.3.9 of PPW and TAN 6, the Plan (para. 7.4.72) states that permission for Rural Enterprise Housing will include a condition that supports their use as affordable housing where it can be shown that there are no occupants eligible for a rural enterprise house. This would ensure that the property would still be available to meet local needs for affordable housing if the reason for the original justification ended.
- 2.14 **Affordable provision beyond the TAN 2 definition** - The Plan promotes a mix of housing on sites to meet local market demand (in accordance with Policy TAI 1). While not conforming to the definition of affordable housing in TAN 2, there is a history in the Plan area of housing units being provided which are 'affordable' based on their location and/or design without the need to introduce the S106 mechanism. The new Plan will continue to enable this to happen where it is reasonable.
- 2.15 **Link with alternative methods of providing affordable units** – The Plan facilitates various methods of providing affordable housing that are promoted by the two Councils' Housing Services and their partners. For example, any empty house that has received a grant from Gwynedd Council to return to residential use must be affordable

for a period of 5 years. The Plan recognises the role that various such schemes have in increasing the supply of affordable housing and recognises this when identifying the housing provision.