

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 on-site 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 not 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

first instance of 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  
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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?

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we would note that this should have referenced paragraph 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  
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certainty to landowners or developers and result in the site not coming forward.  
They should instead as in other LDPs be described as a target as in PPW11.

Further the policy should not suggest that there will be a need for a detailed  
viability assessment on every site, if a developer can demonstrate that a policy  
compliant then there is no need for the application 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?